

HERITAGE IMPACT STATEMENT

UNSW Health Translation Hub



23 February 2021

Cover Image: Artist Impression of the Health Translational Hub site (Source: UNSW)

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HERITAGE IMPACT STATEMENT FOR

UNSW HEALTH TRANSLATION HUB – RANDWICK CAMPUS

REDEVELOPMENT

1.0 INTRODUCTION

This report supports a State Significant Development Application (SSDA) for the proposed UNSW Health Translation Hub (UNSW HTH) at the Randwick Hospitals Campus (RHC), which is submitted to the Department of Planning, Industry and Environment (DPIE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (the Act). Health Infrastructure on behalf of Health Administration Corporation (HAC) is the applicant for the UNSW HTH, which will be delivered with the University of New South Wales (UNSW).

The UNSW HTH forms an extension of the existing and proposed hospital facilities at the RHC, providing a specialist health-related research and education facility on the campus.

1.1 BACKGROUND

A partnership agreement has been established between HAC and the UNSW to develop the UNSW HTH. This partnership will also allow UNSW to operate the building as well as manage its design and delivery.

The partnership will bring together educational and medical researchers, clinicians, educators and public health officials to drive excellence, and support the rapid translation of research, innovation and education into improved patient care. It will strengthen the symbiotic relationship between UNSW and the RHC and its research institutes and broader health partners which form part of the Randwick Health and Innovation Precinct (RHIP).

The UNSW HTH will build on existing affiliation between UNSW and the Sydney Children's Hospital Network (SCHN); Health Infrastructure; and the South Eastern Sydney Local Health District, including Prince of Wales Hospital, The Royal Hospital for Women and Eastern Suburbs Mental Health Services.

The subject site is not listed as an item of heritage significance on the State Heritage Register or Schedule 5 of the *Randwick Local Environmental Plan (LEP) 2012*; however it is in the vicinity of the following State Heritage Register items:

- 'Corana and Hygeia,' 211-215 Avoca Street, Randwick - SHR 00454;
- 'Sandgate,' 128 Belmore Road, Randwick - SHR 00067;
- 'Ritz Theatre,' 43 St Pauls Street, Randwick - SHR 00348;
- 'Big Stable Newmarket,' 29-39 Young Street, Randwick - SHR 00388; and
- 'Nugal Hall,' 16-18 Milford Street, Randwick - SHR 00173.

Department of Planning, Industry and Environment has issued Secretary's Environmental Assessment Requirements (SEARs) for the proposed development. This report has been prepared having regard to the relevant SEARs as follows:

Heritage

Provide a statement of significance and an assessment of the impact on the heritage significance of the heritage items adjacent to the site in accordance with the guidelines in the

NSW Heritage Manual (Heritage Office and DUAP, 1996) and Assessing Heritage Significance (OEH, 2015).

Accordingly, this Heritage Impact Statement (HIS) reviews the proposal in terms of the relevant heritage provisions of the *Randwick LEP 2012* and the Impact Assessment Criteria guidelines endorsed by the NSW Heritage Council.

1.2 METHODOLOGY

This Heritage Impact Statement has been prepared in accordance with the guidelines set out in the *Australia ICOMOS Charter for Places of Cultural Significance*, 2013, known as The Burra Charter, and the New South Wales Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) publication, *NSW Heritage Manual*.

The Burra Charter provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words *place*, *cultural significance*, *fabric*, and *conservation*, is as defined in Article 1 of The Burra Charter. The *NSW Heritage Manual* explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

1.3 SITE DESCRIPTION AND LOCATION

The site is located approximately 6 kilometres (km) from the Sydney Central Business District (CBD), within the Randwick Local Government Area (LGA). It is located approximately 4km from Sydney Airport. Figure 1 provides a regional context map of the site showing its location in relation to the Sydney CBD and surrounding centres.

This block sits in between the existing Randwick Hospitals Campus and the UNSW Kensington Campus, and directly adjacent to the CBD and South east Light Rail services which runs along High Street (Figure 2). The site of the proposed UNSW HTH has an area of 8,897square metres (sqm).

The site has been subject to some site preparation and early works associated with the broader development of the block. Adjacent to the site, along the High Street and Botany Road frontages, runs a 6-metre (m) wide stormwater and sewage easement.

Although there are plans to amalgamate the lots on the site, for the purposes of this report, the existing lot numbers are referenced, which reflect the former, individual residential allotments associated with the former use of the site. The subject site comprises the following lots identified by the NSW Land Registry Services (LRS) as:

- Lots 3-14, DP12909;
- Lots 1-7 DP13997;
- Lot 1, DP300666;
- Lots A & B, DP 439756;
- Lots A-D, DP440501;
- Lot X and Y, DP445567;
- Lots 1 and 2, DP590480; and
- Lot 32, DP667518

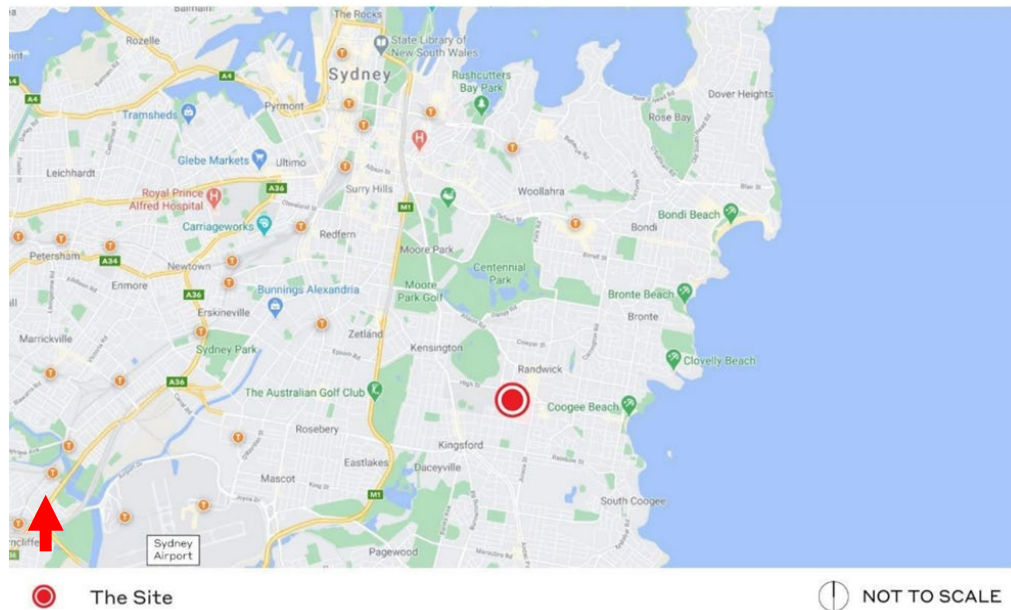


Figure 1: Site Context. (Source: Google Maps and Ethos Urban).



Figure 2: Site aerial (Source: Nearmaps and Ethos Urban).

1.4 HERITAGE MANAGEMENT FRAMEWORK

The subject site is not listed as an item of heritage significance on the State Heritage Register or Schedule 5 of the *Randwick Local Environmental Plan (LEP) 2012*; however it is in the vicinity of the following State Heritage Register items:

- 'Corana and Hygeia,' 211-215 Avoca Street, Randwick - SHR 00454;
- 'Sandgate,' 128 Belmore Road, Randwick - SHR 00067;
- 'Ritz Theatre,' 43 St Pauls Street, Randwick - SHR 00348;
- 'Big Stable Newmarket,' 29-39 Young Street, Randwick - SHR 00388; and
- 'Nugal Hall,' 16-18 Milford Street, Randwick - SHR 00173.

1.5 AUTHORSHIP

This report was prepared by Christiane Moodie, Heritage Consultant, using research and a history written by Dr Martina Muller, Historian, of **NBRSARCHITECTURE**. This report has been reviewed by Samantha Polkinghorne, Director, of **NBRSARCHITECTURE**.

1.6 LIMITATIONS

This report is limited to the assessment of potential impacts on the European cultural heritage values of the site and does not include Aboriginal and Archaeological assessment. This report only addresses the relevant planning provisions that relate to heritage.

This report does not include an assessment of the cultural significance of the heritage items identified in the vicinity of the subject site. This report is limited to assessment of the impact of the proposed development on the significance of the heritage items identified in the vicinity of the subject site.

1.7 COPYRIGHT

Copyright of this report remains with the author, **NBRSARCHITECTURE**. Unless otherwise noted, all images are by the author.

2.0 DOCUMENTARY EVIDENCE

2.1 PRE-EUROPEAN HISTORY

Aboriginal people of the Cadigal (Gadigal) band have lived in the Randwick area for thousands of years.¹ Prior to European colonisation, they moved around the area, using the abundant natural resources of the land, the waterways and the ocean.² In 1995, one of the oldest Aboriginal campsites was discovered off Avoca Street, dating from 8,000 years before the present.³

The area of Randwick originally contained swampy areas as well as sand dunes, low scrubs and dense forests.⁴ A stream (later named Lachlan Stream) flowed through modern Kensington and Eastlakes towards Botany Bay, providing a constant fresh water supply. A large swamp just northwest of present-day Randwick was later named Lachlan Swamps and subsequently became Centennial Park, in 1888.⁵

2.2 DEVELOPMENT OF THE SUBURB

The Randwick area developed very slowly and only a small number of Europeans settled in this swampy area in the first half of the 19th century.⁶ The district became initially known for the Asylum for the Relief of Destitute Children (opened 1858 and later reused as the Prince of Wales Hospital) and the Randwick racecourse (from the 1840s, initially known as 'sandy track', later the location of the University of NSW).

The establishment of the village of Randwick itself, from the 1850s, was largely due to Simeon Henry Pearce who named his property 'Randwick', in honour of his Gloucestershire village. Among the earliest buildings were St Jude's Church of England and associated schoolhouse (1858), as well as the Coach and Horses Hotel (1859), which also provided Randwick's first mail service.



Figure 3: The Coach and Horses Hotel, corner Avoca and Albion Streets, Randwick, 1870-1875. (Source: State Library of NSW, Call No. ON 4 Box 56 No 24, Digital Order No a2824983)

¹ Lawrence, J., *Pictorial History. Randwick*, Alexandria: Kingsclear Books, 2001, p4

² Randwick Council, 'Indigenous History', <http://www.randwick.nsw.gov.au/about-council/history/our-story/indigenous-history> (accessed February 2021)

³ Curby, P., Randwick, Dictionary of Sydney, 2015, <https://dictionaryofsydney.org/entry/randwick> (accessed February 2021)

⁴ Lawrence, J., *Pictorial History. Randwick*, Alexandria: Kingsclear Books, 2001, pp2-3

⁵ Curby, P., Randwick, Dictionary of Sydney, 2015, <https://dictionaryofsydney.org/entry/randwick> (accessed February 2021); NSW Heritage Inventory Database, 'Centennial Park, Moore Park, Queens Park', Database No. 5045397

⁶ For this and the following see Curby, P., Randwick, Dictionary of Sydney, 2015, <https://dictionaryofsydney.org/entry/randwick> (accessed February 2021)

Randwick developed into a densely populated suburb during the second half of the 19th century. Various grand houses, such as *Sandgate* or *Ventnor*, were built during the 1870s, and Randwick Town Hall opened in 1882. Randwick Post Office opened in 1897. An extensive tramway network, built between 1880 and 1921, making travelling to the city easier.

The population increased sharply again during the interwar years, which led to the construction of numerous flat buildings. High-rise buildings proliferated during the 1960s, and the suburb increasingly started to lose its original English village character, with many historic buildings being demolished to make way for large scale developments. This trend has continued over the last 30 years and many low-rise interwar streetscapes have been replaced by large centres with multi-storey buildings.



Figure 4: Randwick Post Office, c1910. (Source: NSW State Archives & Records, File 4346_a020_a020000005)

2.3 BRIEF HISTORY OF THE SUBJECT SITE

The subject site is sited on a block of land located between the Prince of Wales Hospital in the east and the University of NSW Campus in the west. It was originally part of a parcel of land containing six acres, two roods and 25 perches, granted to Simeon Henry Pearce and James Pearce by Crown Grant dated 1 November 1851.⁷

By August 1889, that same parcel of land (bar three perches) was owned by Edwin Thomas Penfold and George Wall, who brought it under Torrens Title.⁸ The Certificate of Title noted a lease made on 1 June 1886 to Charles Morton Pearce, nurseryman, of part of the site for a period of six years and six months. Charles M. Pearce and his brother, Alfred Pearce were both noted as nurserymen and florists on the south side of High Street in the *Sydney Sands Directory* of 1889, with Mrs. Sophia Pierce listed at the adjacent "The Willows".⁹

⁷ NSW LRS, CT Vol. 936 fol. 137.

⁸ *Ibid.*

⁹ City of Sydney Archives, *Sydney Sands Directory*, 1889, Randwick – High Street South.

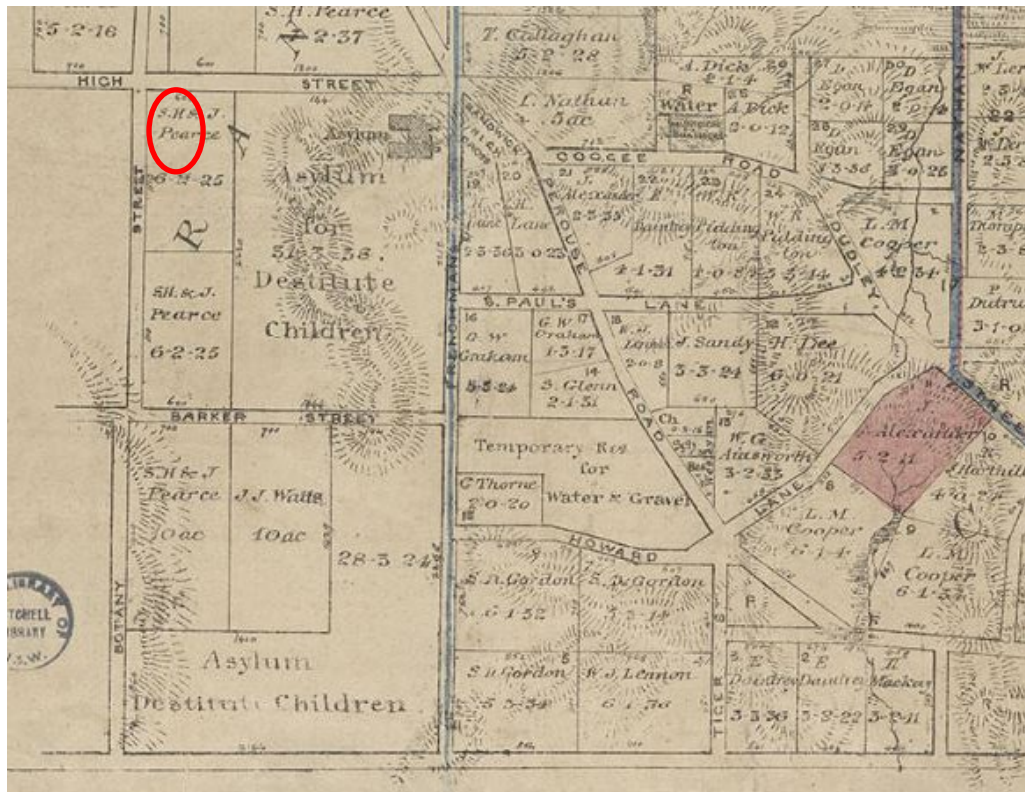


Figure 5: Detail from 1859 map showing the location of the subject site at the corner of High and Botany Streets (circled red), adjacent to the Asylum for Destitute Children. (Source: State Library of NSW, 'Randwick Waverley & Coogee 1859', c00704)

Messrs. Pierce Brothers established a flower and plant nursery at the site, "situated at Randwick, not far from the back of the Randwick Asylum, and here, in a warm sheltered undulation, protected by numbers of old large pines, willows, and other trees, they cultivate an area of about 12 acres, and produce not only plants for sale, but enormous quantities of beautiful flowers to supply its large and increasing demand in Sydney."¹⁰ The brothers had bought the business of Treseder and Bartlett at the Sydney Arcade and sent "every morning and average of from eight to ten large clothes baskets full of cut flowers"¹¹ from Randwick, where they grew an enormously wide range of plants such as violets, roses, petunias, ferns, orchids. The site contained various bush houses, glasshouses, hothouses, frames, and potting sheds, and a small watercourse as well as various wells and ponds ensured a sufficient supply of water.¹² By 1893, Pearce Brothers were known as 'Vice-Regal Florists', with nurseries at Randwick and Gosford.¹³

Charles M. Pearce acquired the site on 19 February 1903 and leased part of it to William George Valentine, also a nurseryman and florist, from May that same year.¹⁴ It appears that Pearce Bros. remained at Randwick, as in 1905 they reportedly had 30 acres of nursery grounds at Randwick and Botany.¹⁵ However, in 1911 they sold the Randwick property to Albert Edward Reid, a commercial traveller from Sydney, who subdivided it three years later,

¹⁰ 'AMONG THE FLOWER NURSERIES.', *Sydney Morning Herald* (NSW: 1842 - 1954), 14 September 1889, 15, <http://nla.gov.au/nla.news-article13744632>.

¹¹ 'AMONG THE FLOWER NURSERIES.', 15.

¹² 'HORTICULTURAL.', *Sydney Mail and New South Wales Advertiser* (NSW: 1871 - 1912), 25 May 1889, 1070, <http://nla.gov.au/nla.news-article161933322>.

¹³ 'City of Sydney Archives', accessed 2 February 2021, <https://archives.cityofsydney.nsw.gov.au/nodes/view/1562747>.

¹⁴ NSW LRS, CT Vol. 1468 fol. 16.

¹⁵ 'PEARCE BROS.', *Sydney Morning Herald* (NSW: 1842 - 1954), 21 December 1905, 3, <http://nla.gov.au/nla.news-article14721103>.

selling the allotments on the western side of the newly formed Eurimbla Avenue to Frederick Curry and the rest to Charles William Coulton (Figure 6). Both transfers were noted on 21 September 1914, with the subdivision registered as Deposited Plan 7745.¹⁶

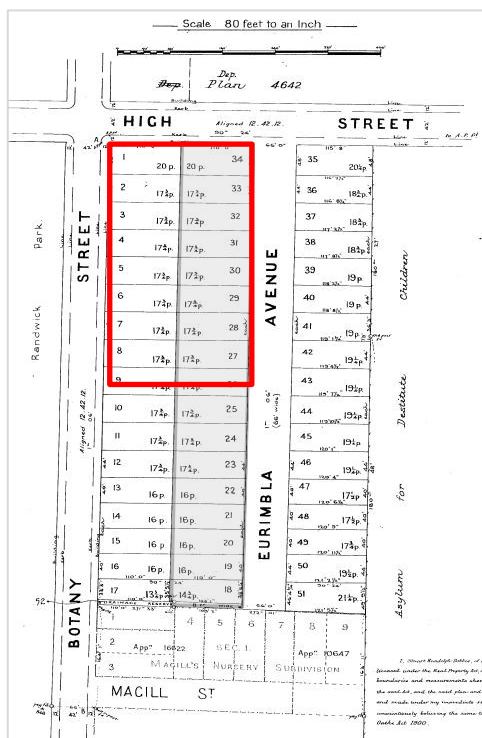


Figure 6: 1914 – Deposited Plan 7745, dated 8 July 1914, showing lots transferred to Frederick Curry shaded grey. The approximate extent of the subject site is outlined in red. The allotments to the south, facing Magill Street, were not part of that subdivision. (Source: NSW LRS, DP7745)

After Charles W. Coulton's death, his property was transferred to his wife Alice Maud Coulton, Charles F. Coulton and William L. Coulton, and a new Certificate of Title was issued in May 1920, initiating the subsequent sale of allotments to individual buyers who developed them for residential purposes.¹⁷ While the *Sydney Sands Directory* listed 5 occupants on the eastern side of Botany Street, between High and Magill Streets in 1920, there were 26 individual occupants at 49 to 101 Botany Street, Randwick, in 1930.¹⁸

Frederick Curry on the other hand began to sell his allotments from 1916, two years after he had acquired the land on the western side of Eurimbla Avenue. Most of these allotments were transferred to Sydney Coulton, a builder from Waverley, in successive and separate transactions.¹⁹ Only our allotments (18 and 19, 20 and 29) were sold to other individuals between 1916 and 1921.

On 9 October 1918, the Commonwealth acquired six allotments on the western side of Eurimbla Avenue (Lots 26-31) and two allotments on the eastern side (Lots 35-36) for defence purposes.²⁰ The property contained a row of 10 or 14 pairs of existing cottages, likely built by Sydney Coulton during his brief ownership. These cottages were acquired for use as homes for nurses at the nearby hospital, which had become a Military Repatriation

¹⁶ NSW LRS, CT Vol. 1468 fol. 16.

¹⁷ NSW LRS, CT Vol. 2521 fol. 228.

¹⁸ City of Sydney Archives, *Sydney Sands Directory*, 1920 and 1930, Randwick – Botany Street East.

¹⁹ NSW LRS, CT Vol. 2521 fol. 227.

²⁰ 'NOTIFICATION OF THE ACQUISITION OF LAND BY THE COMMONWEALTH.', *Commonwealth of Australia Gazette (National)*: 1901 - 1973, 17 October 1918, 2038, <http://nla.gov.au/nla.news-article232462662>.

Hospital.²¹ After the war, the cottages were occupied by ex-servicemen, with the Defence Department in March 1921 planning to sell the allotments.²² On 27 July 1922, Lots 26 to 31 and 36 were sold to the War Service Homes Commissioner, who subdivided the land as registered in DP 12909 and sold the newly created allotments to individual buyers from early 1925.²³ Accordingly, the *Sydney Sands Directory* noted 12 occupants on the western side of Eurimbla Avenue in 1920, but by 1930 there were 33 occupants listed from 2 to 68 Eurimbla Avenue.²⁴

An aerial photograph dated 1943 shows the area of the former Pearce Bros. Nursery fully developed with residential buildings (Figure 7). By that time, the area immediately to the east was in use as the Randwick Military Hospital, renamed the Prince of Wales Hospital in 1953, while the area to the west of Botany Street was still known as Randwick Park, and it was not until 1959 that it became part of the University of NSW campus.

Further subsequent subdivision and amalgamation of allotments at the subject property appears to have occurred until recently, when the subject site was acquired by the NSW State Government as part of a larger land acquisition and planned expansion of the Prince of Wales Hospital. On 4 September 2018, the Sydney Eastern City Planning Panel and Randwick City Council granted development consent for demolition of 92 dwellings and ancillary structures, including the buildings at the subject site (DA/208/2018).²⁵ Demolition of all existing buildings on the site was subsequently carried out.



Figure 7: 1943 – Aerial photograph with the approximate extent of the subject site outlined in red. (Source: NSW LRS, SIX Maps, 1943 aerial imagery)

²¹ 'FEDERAL COTTAGE DEAL', *Sunday Times* (Sydney, NSW : 1895 - 1930), 27 October 1918, 5, <http://nla.gov.au/nla.news-article123138536>; 'TWO INTERROGATORIES', *World* (Hobart, Tas. : 1918 - 1924), 16 March 1921, 4, <http://nla.gov.au/nla.news-article187562202>.

²² 'DIGGERS, GET OUT', *Smith's Weekly* (Sydney, NSW : 1919 - 1950), 5 March 1921, 1, <http://nla.gov.au/nla.news-article234267953>.

²³ NSW LRS, CT Vol. 2940 fol. 163; Vol. 3358 fol. 225.

²⁴ City of Sydney Archives, *Sydney Sands Directory*, 1920 and 1930, Randwick – Eurimbla Avenue West.

²⁵ NSW Government, *Prince of Wales Hospital Expansion Stage 1*. SSD 9113, February 2019, 2. 7.

2.4 SUMMARY HISTORY OF THE PRINCE OF WALES HOSPITAL

The Prince of Wales Hospital opened as the Asylum for Destitute Children in 1858, in a building designed by NSW Colonial Architect, Edmund Blacket.²⁶ The asylum was located on a grant of 60 acres, made in 1854 to Randwick's first Mayor, Simeon Henry Pearce, and was constructed due to the efforts of the Society for Destitute Children, formed in 1852.

The asylum gradually increased in size, with a wing added in 1868 and the Catherine Hayes Hospital opening in 1870. During World War I, the site was converted and used as a military hospital, known as the Randwick Military Hospital. 4,000 soldiers camped in the asylum's paddock in October 1914, prior to embarkation to the Middle East.²⁷ From 1916, the armed forces officially managed the hospital and continued to do so during World War II, until 1953, when the last soldiers were transferred to the new Concord Repatriation Hospital.

In 1953, the hospital was renamed The Prince of Wales Hospital and run as an annex to the Sydney Hospital. In 1961, it was restructured and managed in association with the Prince Henry Hospital at Little Bay, and two years later the two hospitals were amalgamated under one board.



Figure 8: 1955 – Prince of Wales Hospital, Randwick, photographed by Max Dupain. (Source: State Library of NSW, 'File 016: Prince of Wales Hospital, Randwick, December 1955', ON 559/Box 19/no. 384)

During the 1990s, a major campus upgrade was undertaken, and the Royal Hospital for Women at Paddington and various wards from the Prince Henry Hospital relocated to Randwick. The Prince of Wales Children's Hospital, established in 1976, was also redeveloped and renamed the Sydney Children's Hospital during the 1990s.²⁸ When Prince Henry Hospital closed in 2001, its services were transferred to Randwick.

In 2017 the \$114 million Bright Building was opened, housing the Prince of Wales Hospital's 'Nelune Comprehensive Cancer Centre', UNSW's 'Scientia Clinical Research' project and an expansion of the Sydney Children's Hospital Network. The campus is currently part of a major redevelopment scheme undertaken by the NSW Government.

²⁶ If not otherwise noted, this and the following has been summarised from Prince of Wales Hospital, Our History, <https://www.seslhd.health.nsw.gov.au/prince-of-wales-hospital/about-us/our-history> (accessed February 2021)

²⁷ 'Randwick Military Hospital Heritage Tour', *National Trust* (blog), accessed 2 February 2021, http://staging.nationaltrust.org.au/ahf_event/randwick-military-hospital-heritage-tour/.

²⁸ The Sydney Children's Hospitals Network, About Sydney Children's Hospital, Randwick, <https://www.schn.health.nsw.gov.au/about/about-sydney-childrens-hospital-randwick> (accessed February 2021)

2.5 SUMMARY HISTORY OF THE UNIVERSITY OF NEW SOUTH WALES, KENSINGTON CAMPUS

The University of New South Wales began as The New South Wales University of Technology in 1949, established by the NSW Government as a technological university.²⁹ The new university initially operated from the Sydney Technical College in Ultimo, itself founded in 1878, but from the early 1950s most of the university's administrative functions relocated from Ultimo to the new Kensington campus, where an extensive building program was underway.

The Kensington campus area was originally Crown land and consisted of three separate main areas: the former Tramway Depot, the Kensington Racecourse and Randwick Park, which were acquired by the University in separate stages during the 1950s.

The largest portion of the site, today containing the lower and central campus areas, was originally the Kensington Racecourse which was from 1893 leased to G. R. Rowley, the Secretary of the Kensington Recreation Grounds Company.³⁰ Rowley established a racecourse for ponies and a gallopways (small horses) and built associated saddling paddocks, jockey rooms, two grandstands and a totalisator building on this site. Some of these structures are today still located on campus, such as the totalisator building (now known as the Old Tote Building) and the jockey's changerooms and weighing Area (now the White House). The racecourse was at various times used as a military camp, and in 1948 a migrant hostel operated at the site. The recreation hall (now the Fig Tree Theatre) of the Migrant Hostel also still exists, as well as several Moreton Bay fig trees from the 19th Century.



Figure 9: Kensington Racecourse, c1900-1910, showing the betting rings, with the racecourses and saddling paddocks visible in the background. (Source: State Library of NSW, Call No. PXE 711/295, IE No. 1669207, Digital ID a116295h)

²⁹ The following information is based on the following: McLintock, R., *The Development of the Buildings and Grounds of the University of New South Wales*, March 1993; UNSW Website, About Us – The University – History, <https://www.unsw.edu.au/about-us/university/history> (accessed February 2021); UNSW Records & Archives, Online Exhibitions, https://www.recordkeeping.unsw.edu.au/historicalresources/online_exhibitions.html (accessed February 2021).

³⁰ McMahon, J., *Kensington – A Model Suburb*, Randwick: Randwick and District Historical Society, 1986, p30

A smaller portion of the university campus is located at the top of a sand-hill, near the corner of Botany and High Streets. This was originally occupied by Randwick Park, dedicated in 1884 and rededicated in 1903, extending east to Botany Street and south to Barker Street.³¹ The park was said to have been leased for quarrying to a man named Green until rededication in 1903.³² Although the park was dedicated for the purpose of public recreation, the Council continued quarrying for its own purpose, filling and levelling the slope down towards the racecourse with garbage.

By around the second half of the 1910s this levelling and tipping had created an oval which became known as the Randwick Oval. Quarrying appears to have continued into the early 1920s, with further garbage tipping and levelling. A Municipal Golf Course was opened in December 1932,³³ in the north-eastern corner of the site, extending west towards the oval. A children's playground was said to have been located to the southeast of the golf course. Randwick Park was transferred as a whole from Randwick Council to the University on 20 November 1959, to become what is known today as the upper campus.

The third area, located west of Anzac Parade, was a tramway depot and part of a Migrant Hostel prior to acquisition of the site by the University. Prior to bus services being established, trams used to bring patrons of Kensington Racecourse to High Street, *"and then shunt into an enclosed paddock used exclusively by the department."*³⁴ The trams, running on the Randwick and Coogee Line,³⁵ were said to have effectively parked at the depot until the race meetings concluded, and there were repeated calls to sell this valuable piece of land to bring it to better use. Becoming redundant during the 1940s, the 3.5-acre site (1.4ha) was initially reserved for the proposed elevated Eastern Suburbs Railway.³⁶ The northern portion later became part of a Transport Department Migrant Hostel.³⁷

After acquisition by the university, the first building constructed as part of the new Kensington campus was the Main Building which was completed in 1955. Other buildings from the initial phases of campus development include the Basser College (1959, now demolished), University Union/Roundhouse (1961), Heffron Building (1962), Goldstein College (1963, now demolished), Wallace Wurth & Biological Sciences buildings (1963), the Blockhouse (1965), and Chancellery (1966), to name but a few.

³¹ Randwick Public Park, *New South Wales Government Gazette*, 6 June 1884, Issue No 261, p3630; Randwick Park, *Daily Telegraph*, 12 February 1903, p8

³² If not otherwise noted, the following is based on a Letter from John Metcalfe (University Librarian) to G. Macauley (Registrar), dated 4 March 1965, UNSW Archives, SRF – Kensington Campus, Site Pre-1950 file

³³ Opening of Randwick Course, *Sydney Morning Herald*, 7 December 1932, p16

³⁴ Kensington – Sydney's Oldest 'Pony' Course, *Referee*, 24 August 1939, p2

³⁵ Ibid.; cf. NSW Government Railways and Tramways, *Tramway Guide to Sydney and Suburbs*, Sydney: W.E. Smith, 1900, pp16-17

³⁶ Freestone and Pullan, *Adaptive Master Planning*, 2018, p145

³⁷ Baxter, P., Eight Years of Change, *Tharunka*, 20 December 1966, p4



Figure 10: 1964 – The main walkway at UNSW as seen from Anzac Parade. (Source: UNSW Records & Archives, UNSW: A Portrait. Looking back over 60 years, https://www.recordkeeping.unsw.edu.au/documents/60anniversary_slide_14Sept.pdf (accessed February 2021))

Today, the Kensington campus is a 38-hectare site which contains various buildings and spaces added over a period of over 65 years. The campus reflects the continuous growth of the university as well as the various development strategies implemented over the years, ranging from the first building program (from 1950) to the first overall master plan (1976), its 1984 update, the 1990s campus redevelopment, and the Campus 2020 Master Plan.³⁸

Recent notable buildings and projects include the Roundhouse Refurbishment Project (2018), the Clancy Auditorium Upgrade (2019), completion of the Biological Sciences Buildings (2018 and 2019), Electrical Engineering Building Refurbishment (2019) and the Science and Engineering Building (2019).³⁹

³⁸ UNSW Records & Archives, Campus Development Exhibition, www.recordkeeping.unsw.edu.au/historicalresources/onlineexhibitions/kensington.html (accessed February 2021)

³⁹ UNSW Sydney, Estate Management – Campus Development, www.estate.unsw.edu.au/campus-development (accessed February 2021)

3.0 PHYSICAL EVIDENCE

3.1 SITE CONTEXT AND DESCRIPTION

The subject site is located on the southern side of High Street, Randwick, to the east of the existing UNSW Kensington Campus and to the west of the existing Randwick Hospitals Campus. The built form of the surrounding area is characterised by a mix of residential blocks, generally comprising single dwellings and two and three storey apartment buildings, and the larger institutional buildings of the University of New South Wales and the Randwick Hospitals Campus. High Street connects the university and the hospital, running on a roughly east-west axis from Anzac Parade to the Randwick shops on Avoca Street and Belmore Road.

The site used to be occupied by a number of residential dwellings, which have been recently demolished, and now stands vacant.

3.2 VIEWS

Primary views of the subject site are those available close to the northwest corner, looking south from High Street and looking east from Botany Street.

More distant views of the site are largely obtained of the western portion of the site from the UNSW Kensington Campus, particularly from buildings opening onto Botany Street, as well as of the eastern portion of the site from the Sydney Children's Hospital.

Views of the front (northern) portion of the property become more obscured in each direction along High Street, and views of the side (western) portion of the property become more obscured in each direction along Botany Street. Currently, views are obtainable of the rear (southern) portion of the property from Magill Street, and of the eastern portion of the property from Hospital Road. However, future development towards the northeast, southeast and southwest portions of the block will soon partially obscure these views.

There are currently no distant views or vistas available from, or of, the subject site. However, there is a possibility that future mid- to high-rise development on the site may be visible from other areas in the surrounding suburb.

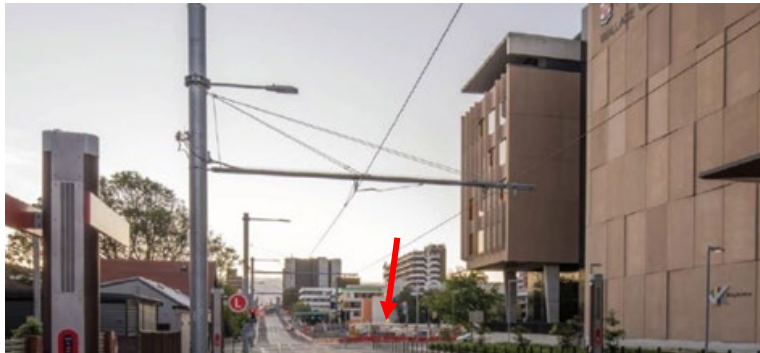


Figure 11: View of the subject site looking east along High Street. The subject site is indicated by the red arrow. (Source: Architectus + ASPECT Studios)

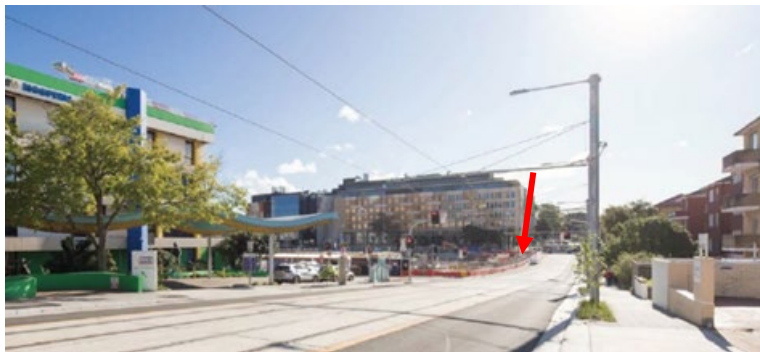


Figure 12: View towards the subject site looking west along High Street. The subject site is indicated by the red arrow. (Source: Architectus + ASPECT Studios)

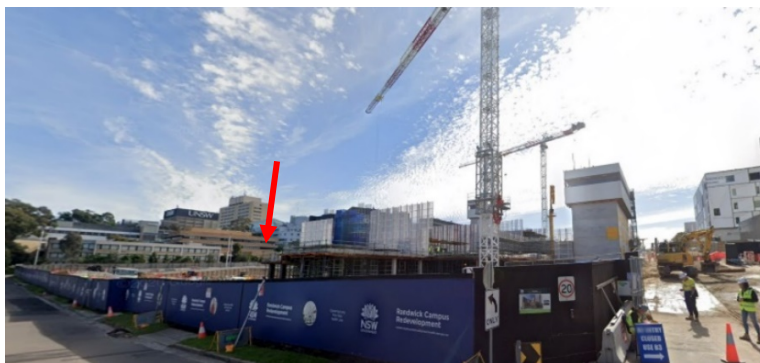


Figure 13: View of the subject site at the intersection of Magill Street and Hospital Road. The subject site is located at the northwest corner of this block, and indicated by the red arrow. (Source: Google Streetview)



Figure 14: View looking north along Botany Street, close to the intersection of Botany Street and Magill Street. The subject site is located at the northwest corner of this block and is indicated by the red arrow. (Source: Architectus + ASPECT Studios)



Figure 15: View of the northwest corner of subject site from High Street, indicated by the red arrow. (Source: Architectus + ASPECT Studios)



Figure 16: View from within the subject site, looking east. (Source: Image supplied by UNSW)

4.0 ESTABLISHED HERITAGE SIGNIFICANCE

4.1 HERITAGE STATUS

The subject site is not listed as an item of heritage significance on the State Heritage Register or Schedule 5 of the *Randwick Local Environmental Plan (LEP) 2012*; however it is in the vicinity of the following State Heritage Register items:

- 'Corana and Hygeia,' 211-215 Avoca Street, Randwick - SHR 00454;
- 'Sandgate,' 128 Belmore Road, Randwick - SHR 00067;
- 'Ritz Theatre,' 43 St Pauls Street, Randwick - SHR 00348;
- 'Big Stable Newmarket,' 29-39 Young Street, Randwick - SHR 00388; and
- 'Nugal Hall,' 16-18 Milford Street, Randwick - SHR 00173.

Details of these items are included below.

Other heritage listed items in the vicinity of the subject site are visually and physically separated from the site by intervening development, local topography, roadways and distance.



Figure 17: Extract from the Heritage Maps 002 (to the left) and 007 (to the right) on the Randwick LEP 2012. The approximate location of the subject site is outlined in blue, and the approximate location of the identified State-listed items in the vicinity are outlined in green. (Source: Randwick LEP 2012)

4.2 SIGNIFICANCE OF CORANA AND HYGIEIA

The following Statement of Significance for Corana and Hygeia located at 211 – 215 Avoca Street, Randwick, is sourced from the NSW Heritage Database, reference number 5045332:

Corana and Hygeia are of State heritage significance as two semi-detached mansions in the late Victorian style and constructed in 1898. They have particular aesthetic significance as a large and picturesque late Victorian two-storey pair of houses with good cast iron work on the verandah valences and columns. It has heavily decorated balustraded roof parapets, classically derived tiled verandah floors and front fences of cast iron and masonry. The building is of excellent streetscape value and provides a significant contribution to the High Cross townscape precinct at Randwick. Their

historical significance is derived from its association with the family of Judge Thomas Callaghan, a prominent citizen and member of the judiciary.



Figure 18: Corana and Hygeia. (Source: NSW Heritage Database, Image taken by Stewart Watters of the NSW Heritage Branch)

4.3 SIGNIFICANCE OF SANDGATE

The following Statement of Significance for Sandgate located at 128 Belmore Road, Randwick, is sourced from the NSW Heritage Database, reference number 5045450:

Sandgate constructed circa 1879 is a two storey sandstone residence. It is associated with Simeon Pearce and the Pearce family who were prominent in the early society and politics of Randwick Municipality. It was designed as a 'Gentleman's residence' and the house retains its original character.



Figure 19: Sandgate. (Source: NSW Heritage Database, Image taken by Stewart Watters of the NSW Heritage Branch)

4.4 SIGNIFICANCE OF THE RITZ THEATRE

The following Statement of Significance for the Ritz Theatre located at 43 St Pauls Street, Randwick, is sourced from the NSW Heritage Database, reference number 5045406:

The Randwick Ritz is a good example of a picture theatre showing the smaller scaling and reduced decoration often applied to suburban theatres. It is one of the few surviving examples of the hundreds of cinema which were built during the 1930's, the most creative period of cinematic design in Australia. It has many fine pieces of Art Deco decoration in a restrained Art Deco setting. The Ritz Theatre is a record of the cinema culture of the 1930's. The building has an excellent ability to interpret aspirations, uses, tastes and importance of cinema in the society of the 1930s. It is the last known surviving theatre by A.M. Bolot. Following demolition or alteration of most suburban picture theatres, it is now an important and rare survival.



Figure 20: The Ritz Theatre.
(Source: NSW Heritage Database, Image taken by Stewart Watters of the NSW Heritage Branch)

4.5 SIGNIFICANCE OF BIG STABLE NEWMARKET

The following Statement of Significance for the Big Stable Newmarket located at 29-39 Young Street, Randwick, is sourced from the NSW Heritage Database, reference number 5045439:

The 'Big Stable' is significant on the grounds of architectural quality, unusual function and building type of historic importance. The Newmarket Precinct (Big Stable, Newmarket House, Sale Ring and Training Stables) will assist in the preservation of an historic asset of unusual value to the national heritage and to the municipality of Randwick. The graceful, homely and unpretentious structure of this site survive almost intact from the 19th century amid well kept trees, lawns and pavements. The occupants of the site survive continue today the horse breeding and training activities traditionally associated with Randwick and give support to complimentary activities in the neighbourhood, in complete harmony with the residential character of the area once known as 'Struggle Town'. Respect for Newmarket's prestige in its associations with Australia's thoroughbred horse breeding industry also extends beyond national borders.



Figure 21: Big Stable Newmarket. (Source: NSW Heritage Database, Image taken by Stewart Watters of the NSW Heritage Branch)

4.6 SIGNIFICANCE OF NUGAL HALL

The following Statement of Significance for Nugal Hall located at 16-18 Milford Street, Randwick, is sourced from the NSW Heritage Database, reference number 5045442:

Nugal Hall is of State significance as an example of an impressive two storey mansion constructed of stone in the Gothic Revival style. Designed by the Colonial Architect Mortimer Lewis it was constructed in 1853. The land was a grant to Alexander Arthur, in 1851 by Governor Fitzroy, of 200 acres. Although not of the very high quality of a few Sydney Gothic Revival houses and despite some 1920s and '30s decorative additions Nugal Hall is nevertheless impressive. It is associate with a number of significant people. It is significant in Coogee/Randwick where increasing high rise development has deprived the area of much of its architectural history. The house sits well in its grounds and is visually important locally..



Figure 22: Nugal Hall. (Source: NSW Heritage Database, Image taken by Stewart Watters of the NSW Heritage Branch)

5.0 THE PROPOSAL

The proposed development has been designed by Architectus and ASPECT Studios.

The following description of the proposal has been provided by Ethos Urban:

The proposal involves the expansion of the existing and proposed hospital facilities at the RHC to provide ancillary health research and education uses. This will be in the form of a single building which will be physically connected (at podium level) to the neighbouring Sydney Children's Hospital Stage 1 and Children's Comprehensive Cancer Centre (SCH Stage 1 and the CCCC) redevelopment.

Specifically, the SDDA seeks approval for:

- *Relevant site preparation, excavation and enabling works.*
- *Construction and use of a new, 15-storey building accommodating research and health education uses, comprising:*
 - *One basement level; and*
 - *A total GFA of approximately 35,600sqm, including health-related research, education and administrative floor space.*
- *Pedestrian link bridges connecting the UNSW Kensington Campus to the RHC, via the Wallace Wurth Building to the UNSW HTH and through to the SCH – Stage 1 and the CCCC.*
- *Landscaping and public domain works, including the creation of over 2,500 sqm of new publicly accessible open space within the eastern portion of the site, sitting between the UNSW HTH and the SCH Stage 1 and the CCCC redevelopment.*
- *Building signage.*
- *Stratum subdivision.*
- *Services and utilities augmentation as required.*

Operation and Function of the UNSW HTH

The UNSW HTH will be an expansion of the RHC to accommodate new health related education, research, and administrative facilities. It will include:

- *Purpose-built spaces for health educators and researchers to work alongside clinicians.*
- *Floor plates for health translation research focussed work with physical connections to the SCH Stage 1 and the CCCC and wider Randwick Hospitals Campus.*
- *Dedicated facilities for the CCCC directly linking the UNSW HTH with the SCH Stage 1 and the CCCC.*
- *An education hub, including education and training rooms allowing hospital staff to educate and train UNSW medical students.*
- *Facilities for education, training, research, seminars and industry events.*
- *Clinical schools for Women's and Children's Health, Psychiatry and Prince of Wales Hospital.*
- *Supporting facilities including retail premises.*

5.1 DOCUMENTATION EVALUATED

The following drawings, prepared by Architectus and ASPECT Studios, were reviewed as part of the preparation of this report:

SHEET NUMBER	SHEET NAME	CURRENT REVISION	CURRENT REVISION DATE
DA0000	Cover Sheet	A	18.02.21
DA0010	Context & Locality Plan	A	18.02.21
DA0015	Site Analysis	A	18.02.21
DA0020	Site Plan	A	18.02.21
DA0030	Site Boundary & Building Setbacks	A	18.02.21
DA0050	Site Survey	A	18.02.21
DA1000	Basement Level -01	A	18.02.21
DA1001	Ground 00	A	18.02.21
DA1002	Level 01	A	18.02.21
DA1003	Level 02	A	18.02.21
DA1004	Level 03	A	18.02.21
DA1005	Level 04	A	18.02.21
DA1006	Level 05	A	18.02.21
DA1007	Level 06	A	18.02.21
DA1008	Level 07	A	18.02.21
DA1009	Level 08	A	18.02.21
DA1010	Level 09	A	18.02.21
DA1011	Level 10	A	18.02.21
DA1012	Level 11	A	18.02.21
DA1013	Level 12	A	18.02.21
DA1014	Level 13	A	18.02.21
DA1015	Level 14 - Plant	A	18.02.21
DA1016	Level 15 - Roof	A	18.02.21
DA2001	North Elevation	A	18.02.21
DA2002	South Elevation	A	18.02.21
DA2003	East Elevation	A	18.02.21
DA2004	West Elevation	A	18.02.21
DA2101	Section A	A	18.02.21
DA2102	Section B	A	18.02.21
DA2103	Section C	A	18.02.21
DA5700	UNSW Campus Connection - Floor Plan	A	18.02.21
DA5701	UNSW Campus Connection - Roof + Soffit Plan	A	18.02.21
DA5750	UNSW Campus Connection - Elevation	A	18.02.21
DA5751	UNSW Campus Connection - Elevation Wallace Wurth	A	18.02.21
DA5755	UNSW Campus Connection - Section	A	18.02.21
DA5760	SCH - Bridge Connection - Floor Plan	A	18.02.21
DA5765	SCH - Bridge Connection - Elevation	A	18.02.21
DA5766	SCH - Bridge Connection - Section	A	18.02.21
DA9100	Independent Basement Plan	A	18.02.21
DA9101	Independent Ground Floor Plan	A	18.02.21
DA9200	Shadow Analysis	A	18.02.21
DA9300	External Materials Schedule	A	18.02.21
DA9310	External Renders	A	18.02.21
DA9311	External Renders	A	18.02.21
DA9312	External Renders	A	18.02.21
DA9313	External Renders	A	18.02.21
DA9314	External Renders	A	18.02.21
DA9315	Signage	A	18.02.21
DA9502	Area Schedule GFA 01	A	18.02.21
DA9503	Area Schedule GFA 02	A	18.02.21

The proposed site plan, ground floor and elevations are reproduced below to provide an overview of the proposed scheme.

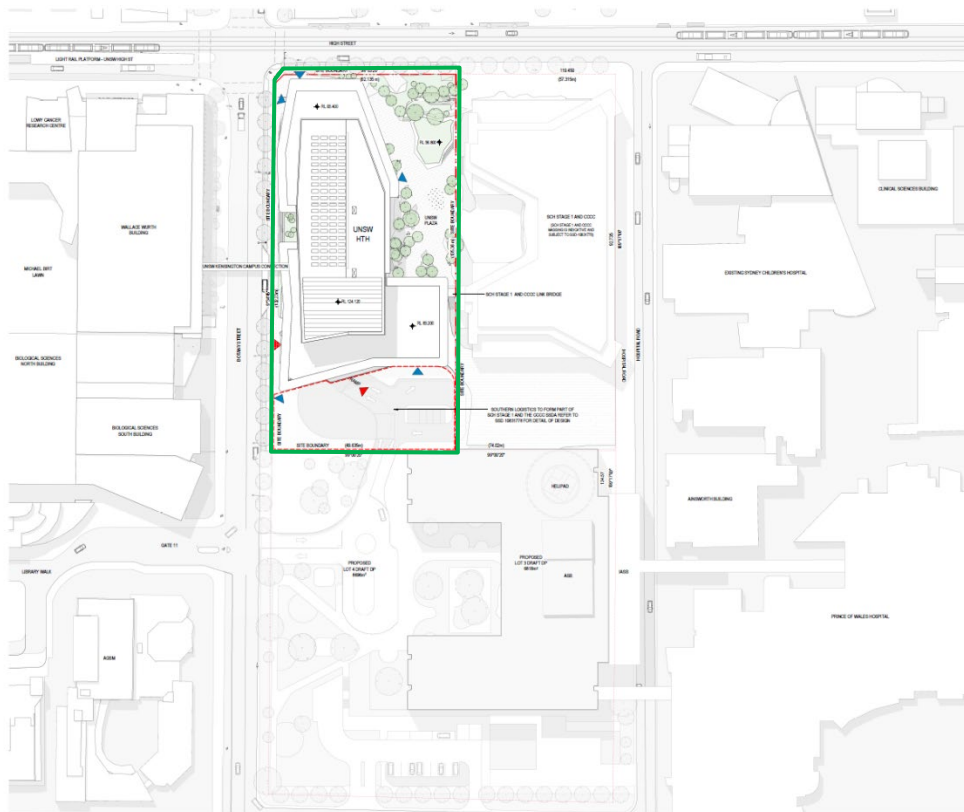


Figure 23: Proposed Site Plan, with the subject site outlined in green. (Source: Architectus with NBRs overlay)

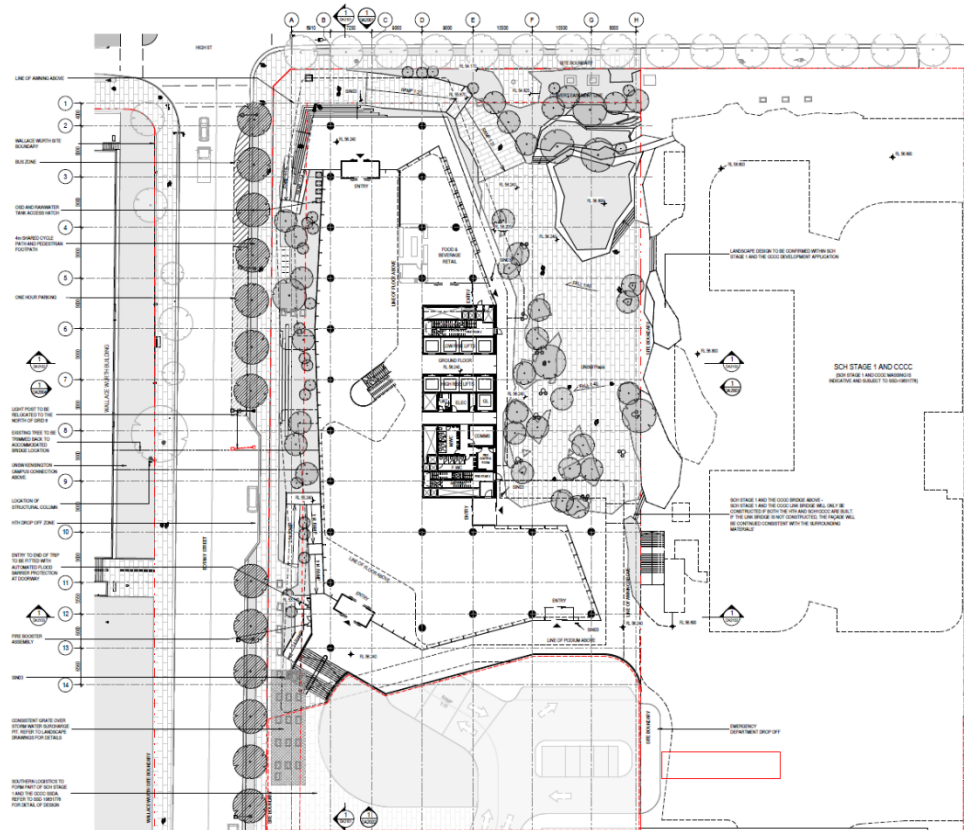


Figure 24: Proposed Ground Floor Plan. (Source: Architectus)

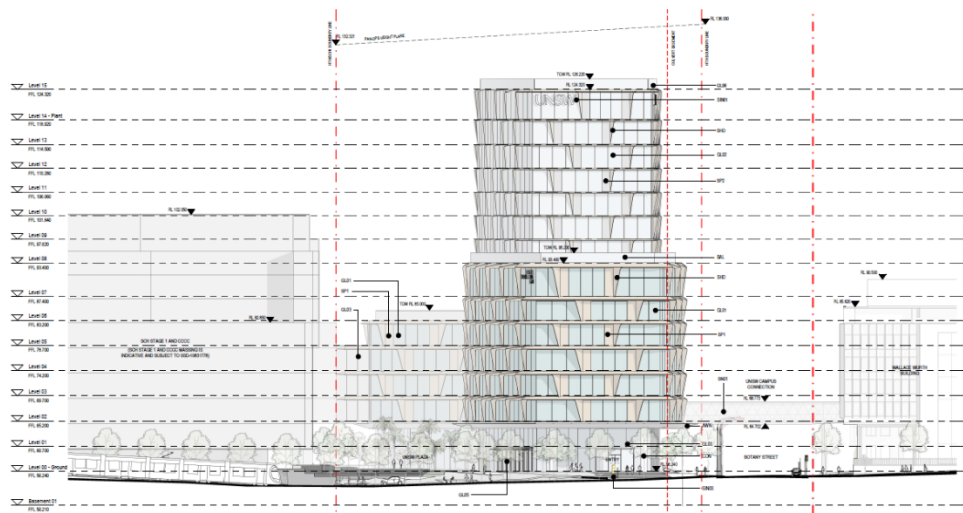


Figure 25: North Facade (Source: Architectus)

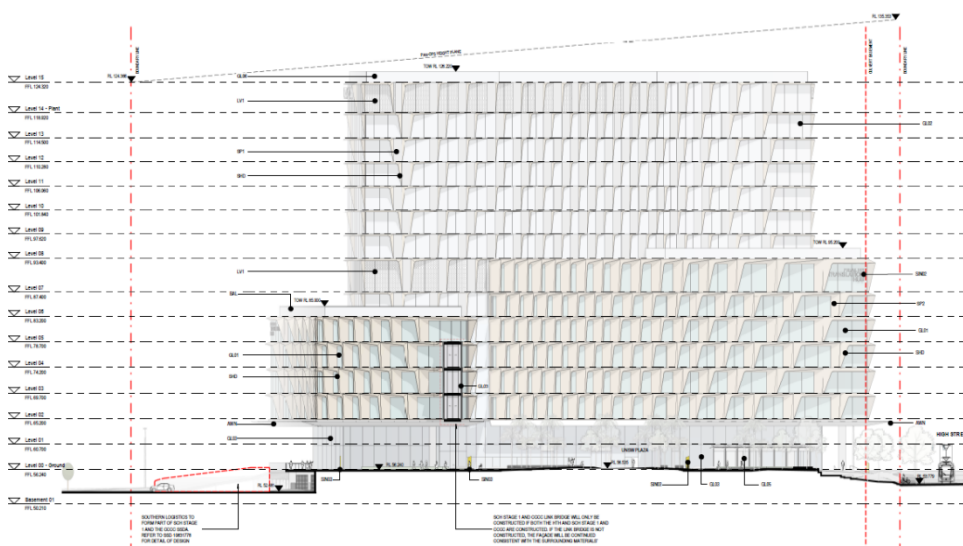


Figure 26: East Facade (Source: Architectus)

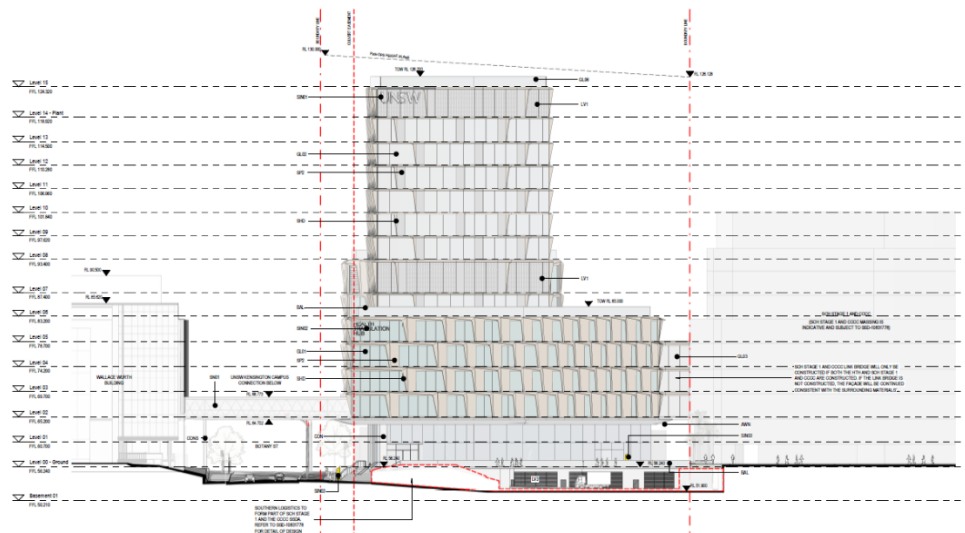


Figure 27: South Facade (Source: Architectus)

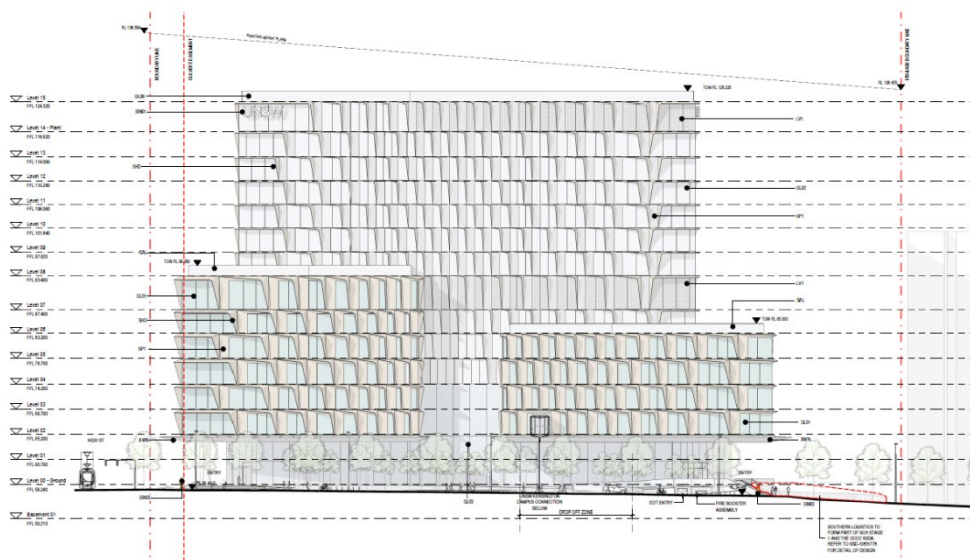


Figure 28: West Façade (Source: Architectus)

6.0 ASSESSMENT OF HERITAGE IMPACT

6.1 INTRODUCTION

This Heritage Impact Statement has been prepared in relation to the following impact assessment criteria: the *Randwick Local Environmental Plan (LEP) 2012*, the *Randwick Development Control Plan (DCP) 2012* and the New South Wales Heritage Office (now NSW Heritage Division) guidelines, *Altering Heritage Assets* and *Statements of Heritage Impact*, contained within the NSW Heritage Manual.

6.2 OVERVIEW OF POTENTIAL HERITAGE IMPACTS

PROPOSED WORKS	HERITAGE IMPACT
Construction of a building in the vicinity of five properties listed on the NSW State Heritage Register	<p>Neutral heritage impact</p> <ul style="list-style-type: none">• No adverse impact upon views from the heritage items in the vicinity by the addition of a new building, identifiably associated with the nearby university campus.• No physical impact to any built or landscape components associated with the heritage items in the vicinity.• Retention of the function and amenity of the heritage items in the vicinity.• Overall retention of the cultural significance of the heritage items in the vicinity.

6.3 EVALUATION OF THE GUIDELINES OF THE NSW HERITAGE DIVISION

The following assessment is based on the assessment criteria set out in the NSW Heritage Office (now Heritage Division) publication 'Statements of Heritage Impact', contained within the NSW Heritage Manual. The standard format has been adapted to suit the circumstances of this application.

The following aspects of the proposal respect or enhance the heritage significance (of items in the vicinity) for the following reasons:

- The proposed works are to a site which is not listed as an item of heritage significance on any form of statutory listing.
- The proposed development will have no adverse impact on the setting of, or views to and from, heritage items in the vicinity, nor diminish any understanding of their significance or character.
- There will be no impact upon the fabric associated with the identified heritage items in the vicinity.
- The established heritage significance of the heritage items in the vicinity will be retained and conserved.

The following aspects of the proposal could detrimentally impact on heritage significance (of items in the vicinity). The reasons are explained as well as the measures to be taken to minimise impacts:

- There are no aspects of the proposal which could have a detrimental impact on the heritage significance of heritage items in the vicinity of the site.

6.3.1 NEW DEVELOPMENT ADJACENT TO A HERITAGE ITEM (INCLUDING ADDITIONAL BUILDINGS AND DUAL OCCUPANCIES)

- *How is the impact of the new development on the heritage significance of the item or area to be minimised?*
- *Why is the new development required to be adjacent to heritage item?*
- *How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?*
- *How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?*
- *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?*
- *Is the new development sympathetic to the heritage item? In what way (eg form, siting, proportions, design)?*
- *Will the additions visually dominate the heritage item? How has this been minimised?*
- *Will the public, and users of the item, still be able to view and appreciate its significance?*

Comment:

The proposed works to the site at the corner of High Street and Botany Street involves modifications to a property which is not heritage listed, and is identified as having no heritage significance.

State-listed heritage items in the vicinity of the subject site include:

- 'Corana and Hygeia,' comprising two semi-detached mansions in the late Victorian style located to the east of the subject site;
- 'Sandgate,' a two storey sandstone residence located to the northeast of the site;
- 'Ritz Theatre,' a picture theatre in the Art Deco style located to the southeast of the site;
- 'Big Stables Newmarket,' a timber-framed stable building located to the south of the site; and
- 'Nugal Hall,' a two storey mansion constructed of stone in the Gothic Revival style located to the northeast of the site.

The significance of these items is drawn from mainly their historic and aesthetic significance.

The proposed building will have no physical impact on these State listed items in the vicinity. The potential visual impacts in terms of alterations to views to and from these State listed heritage items is discussed below.

6.3.2 SURROUNDING IMMEDIATE AND WIDER HERITAGE CONTEXT

The site is located in proximity to Corana and Hygeia (SHR 00454), Sandgate (SHR 00067), Ritz Theatre (SHR 00348), Big Stable Newmarket (SHR 00388) and Nugal Hall (SHR 00173). All five listed items are aesthetically significant and retain many of their original features that contribute to an understanding of their original uses.

As the proposed development is physically separated from these heritage items, at a minimum distance of at least 800 metres away (as indicated by the below figure), the proposed new building will have no impact upon the fabric of these heritage items. Additionally, due to such a distance between the subject site and the heritage items in the vicinity, the development will not overshadow the heritage items located within the vicinity.

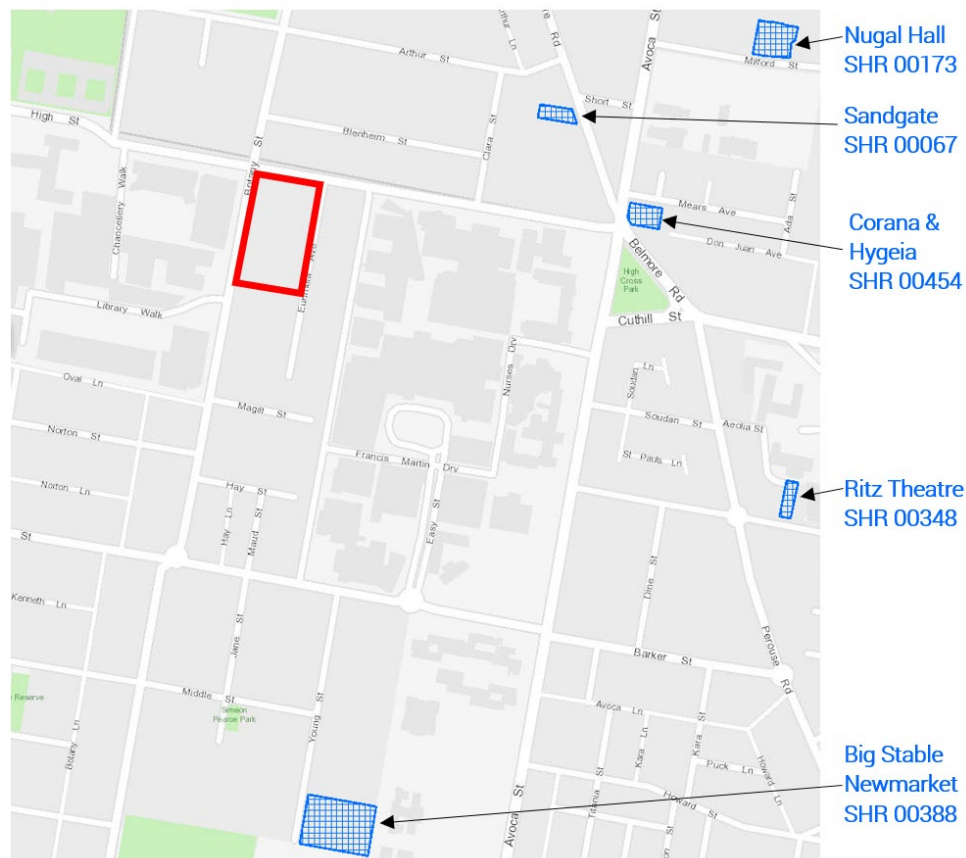


Figure 29: Diagram showing heritage items in the vicinity of the subject site. The approximate location of the subject site is indicated by the red outline, and the State-listed heritage items in the vicinity are outlined and shaded in blue. (Source: NSW Planning Portal, ePlanning Spatial Viewer with NBRs overlay)

Furthermore, the small scale of the heritage items in the vicinity which range in height from one to four storeys, their presentation to the surrounding streetscapes, and their finer detailed architectural qualities are experienced from street level. As such, the appreciation of these heritage items from street level will not be altered by the 15 storey development on the subject site. The original street frontages of these heritage items, and their contribution to the streetscape, will therefore be retained unaltered.

6.3.3 DESIGN RESPONSE

Randwick is defined by a number of mixed-use developments of varying heights. Many of the earlier properties are of a smaller scale, between one and four storeys, whilst later developments stand at a height of over 7+ storeys tall. The impact of taller buildings in the immediate surrounds does not change the area's scale and built form, and thus, the change in the wider setting of these heritage items from the proposal is understood in an already altered context.

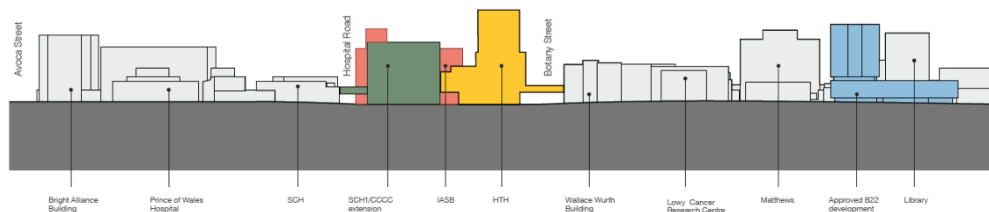


Figure 30: Proposed High Street Elevation. The proposed new building to the subject site is highlighted in yellow. (Source: Architectus + ASPECT Studios)

As such, the heritage items in the vicinity can be visually understood within a continuously changing suburban setting. The new 15 storey building may be visible from these heritage items, and will constitute an addition to this wider setting. However, it will be perceived as a distant addition to the skyline and identifiable as a new building associated with more recent development to the surrounding suburb of Randwick. In particular, it will be understood as part of both UNSW as well as the Randwick Hospital, due to its close proximity to both of these campuses. Additionally, the similarity of its typology with other university and hospital buildings and the use of modern materials will also help reinforce the connection between the proposed development and other, more recent neighbouring developments.



Figure 31: Envelope study showing the proposed building envelope within its immediate context along Botany Street and High Street. (Source: Architectus + ASPECT Studios)



Figure 32: Artist's impression of the proposal. (Source: Architectus + ASPECT Studios)

The proposed building will have no physical impact on the amenity of the heritage items in the vicinity of the subject site, nor any impact upon the legibility of these buildings as historically important to understanding the development of the surrounding area. Members of the public and users of these heritage items will continue to be able to view and use the them, and appreciate their cultural significance.

6.4 HERITAGE OBJECTIVES OF THE RANDWICK LEP 2012

The proposed development is considered to be acceptable, from a heritage perspective, for the following reasons:

- The development will not have a detrimental impact on views from the heritage items in the vicinity through the addition of a new building, identifiably associated with the nearby university campus and distinct from the historic forms of the State-listed items;
- The proposed development will have no physical impact to any built or landscape components associated with the heritage items in the vicinity of the site;
- The proposed development will not visually dominate the heritage items in the vicinity;
- The aesthetic significance of the heritage items in the vicinity will be retained;
- The function and amenity of the heritage items in the vicinity will be retained; and
- The established cultural significance of the heritage items in the vicinity will be retained.

The proposal is, therefore, considered to be consistent with the relevant heritage objectives of the *Randwick LEP 2012*, which are:

5.10 Heritage conservation

(1) Objectives

The objectives of this clause are as follows:

- (a) to conserve the environmental heritage of Randwick,*
- (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views.*

7.0 CONCLUSION

The subject site located at the corner of Botany Street and High Street, Randwick, is not listed as an item of heritage significance on the State Heritage Register or Schedule 5 of the *Randwick Local Environmental Plan (LEP) 2012*; however it is in the vicinity of the following State Heritage Register items:

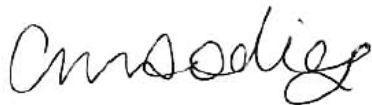
- 'Corana and Hygeia,' 211-215 Avoca Street, Randwick - SHR 00454;
- 'Sandgate,' 128 Belmore Road, Randwick - SHR 00067;
- 'Ritz Theatre,' 43 St Pauls Street, Randwick - SHR 00348;
- 'Big Stable Newmarket,' 29-39 Young Street, Randwick - SHR 00388; and
- 'Nugal Hall,' 16-18 Milford Street, Randwick - SHR 00173.

The proposed new UNSW Health Translation Hub development on the subject site will have an acceptable impact on the heritage significance of the heritage items in the vicinity.

The development will constitute a minor and acceptable alteration to views to and from the heritage items in the vicinity and no physical impact on any built or landscape components of these State listed items. The proposed development will not visually dominate any of the heritage items in the vicinity, nor alter the function or amenity of them. Their established cultural significance will be retained.

The proposed development is consistent with the heritage objectives of the *Randwick LEP 2012*.

For these reasons, the consent authority should have no hesitation, from a heritage perspective, in approving this application.



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