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Ella Wilkinson Planning Officer Modification Assessments, Planning Services NSW Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

Dear Ms Wilkinson

## RE: Notification of Modification Application for Building 7 and Building 9 within Royal North Shore Hospital - MP 06\_0051 MOD 6

I refer to your email dated 29 January 2015 inviting the Heritage Council of NSW (Heritage Council) to comment on the proposed modification to the previously approved Concept Plan for development at Royal North Shore Hospital (MP06\_0051).

This modification (Mod 6) proposes the demolition of Buildings 7 and 9, and requests modification of the original approval conditions to allow this demolition to occur.

I note that the consent conditions for the previously approved Concept Plan state that every effort should be made to retain the heritage buildings within the site; including Building 7 (Diabetic Unit) and Building 9 (Lanceley Cottage), and that future applications must demonstrate why they cannot be retained and integrated into the subsequent redevelopment proposal.

As justification for their demolition, the Heritage Impact Statement (HIS) concludes:

All options for retaining these buildings have been considered. Others have determined that the buildings are not suitable for adaptive re-use by the Hospital and that the land upon which they stand is required by the Hospital for other purposes.

It is noted that the Royal North Shore is not listed on the State Heritage Register, therefore the Heritage Council is not the relevant consent authority. However, given that the site has been identified of potential state heritage significance, condition M12.1 of the Concept Plan approval states:

A Conservation Management Plans(s) (CMP) shall be submitted to and approved by the Director-General, in consultation with NSW Heritage Office, prior to or concurrent with the lodgement of any application for development within Precinct 3 and submitted with any application for development within that precinct.

It is also noted that two other heritage buildings within the site have previously been approved for demolition through a subsequent modification of the original consent. Although Building 7 and 9 are located outside of Precinct 3, approval to demolish these buildings would result in the

loss of four out of the eleven buildings identified of moderate to high significance in the original HIS, which could result in a cumulative adverse impact to the broader heritage values of Royal North Shore Hospital.

Ideally a Conservation Management Plan should be prepared prior to approving the demolition of these buildings, to address the current context of the site and their significance in relation to the heritage significance of the Hospital. However, if the demolition of Building 7 and 9 is approved prior to preparation of the CMP, it is recommended that a CMP is prepared before any further applications for development that may have an impact on the heritage significance of the site. Any subsequent application for development that affects heritage items should demonstrate compliance with the policies of the CMP.

Please be aware that under Section 170A of the *Heritage Act 1977*, the Department of Health must give the Heritage Council not less than 14 days' notice before the demolition of any buildings entered on its register in accordance with an endorsed Redundant Assets Plan, as prescribed by the State Agency Heritage Guide (2005).

If you have any further enquiries regarding this matter, please contact Nina Pollock, Heritage Assets Officer at the Heritage Division, Office of Environment and Heritage, on (02) 9873 8520.

Yours sincerely

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Rajeev Maini Acting Manager, Conservation Heritage Division Office of Environment & Heritage As Delegate of the NSW Heritage Council 26 April 2016