



Memorandum

To Daniel Callavo – A/Director – Government Land and Social Projects
cc. Ben Eveleigh – Planning Officer – Infrastructure Projects
From Petula Samios - Director – Heritage Branch
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Date 25 October 2010 **File no** 09/04145 **File** B205177

Subject: Part 3A – Graythwaite - Comments on Draft DGRs, Concept Plan and Preliminary Environmental Assessment

Background and Heritage Context

The Heritage Branch was been provided with the Draft DGRs, Concept Plan and Preliminary EA for the Graythwaite site to provide comment to the DoP team assessing this Part 3A application.

The Graythwaite site is listed on the State Heritage Register and its significance addresses all levels of significance criteria with some of these at the highest levels (Assessment against criteria from Heritage Database at **Attachment A**). The applicant, and their consultants, should note that the SHR curtilage is comprised of the entire lot (Lot 2, DP 539853 see **Attachment B**).

Heritage Branch Comments

While detailed descriptions are not required under the Part 3A provisions of the Act for concept plans, there should be sufficient discussion about the impacts of the proposed 'concept' on the significance of the item. Within the heritage management framework, the significance of an item and its component parts, is usually part of the preparation of a Conservation Management Plan (CMP) which includes an **assessment of significance** followed by a **detailed statement of significance**. This detailed statement can include grading of the site's components (e.g exceptional, high, moderate, low, intrusive). This process allows the developer to assess where new development is most appropriate having regard to the significance of the site. Any proposed development should be informed by such assessments.

Any new development proposed within an SHR listed site should ensure that that the impacts of the proposed development will not have significant impacts on the listed item, and its component elements. Where the proposal will have a **material impact** on the item, and its component elements, there should be sufficient justification which describes why alternative development options are not adequate.

In the case of Graythwaite, the applicant is keen to obtain Heritage Council endorsement of a CMP they are preparing for the site. This can be built into the Part 3A assessment framework and requires the particulars to be discussed in further detail. It is imperative that in such a process that the CMP be endorsed prior to the approval of any concept plan. This would ensure that development proposed in the concept plan addresses the significance of the site and that there is sufficient guidance for future stages of the works proposed.

To facilitate this, it is proposed that Stage 1 of the concept plan be the stage where a CMP is submitted to the Heritage Council, or their delegate depending on time requirements, for endorsement. The concept plan approval could occur once the CMP has endorsed. This could allow subsequent stages to be exempt from further assessment where they address an endorsed CMP however this should be discussed further internally before the applicant is advised. Any Statements of Heritage Impact (SoHIs) should be provided to the Heritage Branch for comment prior to the commencement of works.

The Heritage Branch strongly encourages the Department to seek to the following information to support the proposed concept plan and stage 1 works:

- A discussion of how the proposed concept plan addresses the CMP.
- Justification for the areas identified for redevelopment including how these areas and proposed envelopes address:
 - Bulk and scale impacts to adjacent buildings on the site particularly the main sandstone building
 - Visual corridors to and from the site.
 - Significant landscaping and trees.
 - Areas of potential archaeology.
- Discussion of other alternatives considered for the new buildings and why these have been dismissed as feasible options.
- Where material impacts are proposed, a discussion of why these impacts are necessary and how they will be mitigated.

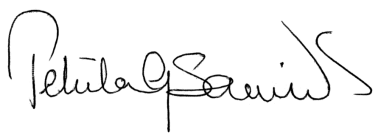
The table at **Attachment C** shows how the endorsement of the CMP could work for the 3 stages of the proposed concept plan.

Attachment D provides some text for consideration for the final DGRs which captures the intent of the proposed process. As stated previously, this applicant seeks the Heritage Council endorsement and as such more involvement from the Heritage Branch in the assessment process is appropriate for this project than would otherwise be proposed.

Please note that given the uncharted territory of endorsing a CMP as part of a Part 3A process, it may be appropriate for an internal workshop to be undertaken to discuss this part of the process further between the Part 3A team and the Heritage Branch.

If you have any further enquiries regarding this matter, please contact Alejandra Rojas on (02) 9873 8559.

Yours sincerely



Petula Samios 25.10.10
Director
Heritage Branch
Department of Planning

Attachment A: Assessment of Significance

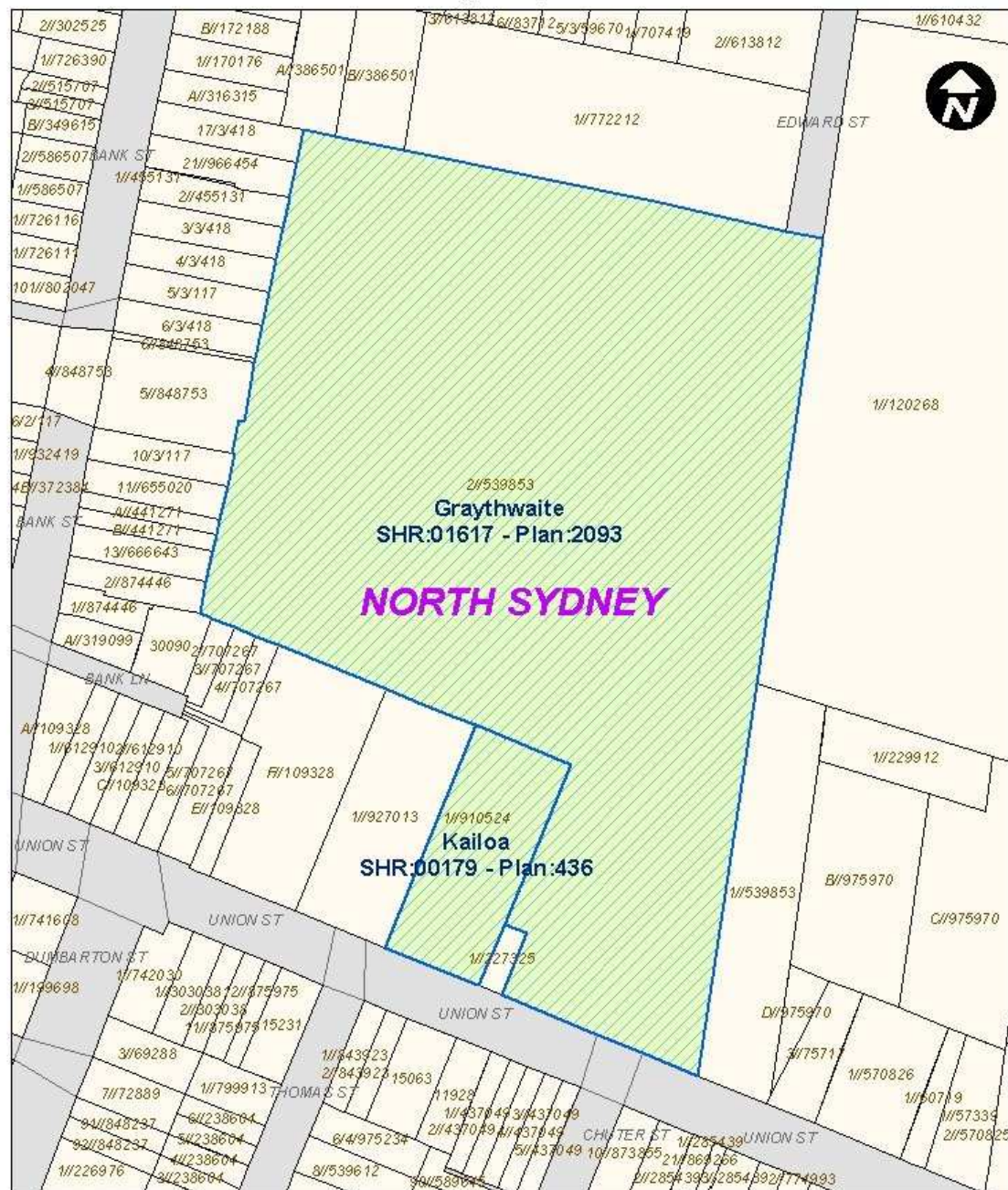
SHR Criteria a) [Historical Significance]	Graythwaite has historical significance as an early example of a prominent North Shore residence which has been altered extensively over its life to reflect the social standing and status of its changing ownership.
SHR Criteria b) [Associative Significance]	The property has strong associations with the Dibbs family and particularly Thomas Allwright Dibbs, Manager of the Commercial Banking Company of Sydney, who was also ex-officio appointee to the Royal Commission on the Public Service of 1887 - 90. Its present use as a convalescent home reflects the compassion and generosity of Thomas Allwright Dibbs to provide a caring place for Australian soldiers on their return from the Great War. The grounds on which Graythwaite is located remains intact in size and configuration of the 1873 subdivision. It retains remnants of the extensive garden curtilage developed from that period and during Dibbs' ownership and retains those magnificent harbour views and vistas to the south and west.
SHR Criteria c) [Aesthetic Significance]	<p>Graythwaite has aesthetic significance because this 2.7 hectare property is an unusually large land parcel considering its close proximity to the CBD of North Sydney which retains substantial land terracing reinforced with mature landscaping. The buildings grand Victorian Italianate architectural form located on the highest part of the property reflects a major renovation, within the Victorian period 1880 - 1885 during Thomas Allwright Dibbs' ownership, to capture outstanding views and vistas of Sydney Harbour and beyond.</p> <p>The landmark qualities of this building are no longer apparent when viewed from its main street frontage, but the outward views and vistas from the building to the south and west are unparalleled and extensive. Remnant landscape elements and plantings are evident over the entire site area. These remnants are in the form of mature isolated and group plantings nearby the building group but extend to the terraced forecourt in rows and clusters on the terrace embankments. Other mature plantings line the driveway entrance from Union Street and extend to the main building then to the west and links up with the car parking areas at the 1880s coach house and Edward Street public car park. To the south and west, remnant landscape plantings provide a dense barrier to the immediate suburban development. Distant views and vistas over the top of the landscape provide a pleasant outlook. Formalised garden plots and pathways are located between several of the buildings.</p>
SHR Criteria d) [Social Significance]	Graythwaite is socially significant to the surrounding community for its historical significance as an example of North Shore residence for the wealthy. Its significance has also been established socially through its use as a convalescent home, a hostel for long term disablement and then a geriatric hospital.
SHR Criteria e) [Research Potential]	<p>Graythwaite has technical/research significance because the main building (although altered for hospital use since 1916) retains detailed finishes, fireplaces and hardware from the Victorian period usually lost in buildings of this type in private ownership. It also contains timber floor and ceiling framing of pit sawn origins with ceiling framing connections using timber pegged tenons, further establishing its early origins and importance as one of the earliest surviving structures in the North Sydney area.</p> <p>The former stables building with loft is a remnant of early vernacular form and formed part of the original building group on land granted to Thomas Walker in 1832.</p> <p>The buildings contain remnants from all phases of the property's development and this is reflected in its high archaeological, educational and research potential.</p> <p>The property has been recognised to contain one of the largest and most significant collections of late 19th century cultural plantings in the North Sydney area.</p>
SHR Criteria f) [Rarity]	The highest levels of significance of Graythwaite then relates to its associations with the early development of North Sydney and not necessarily its Convalescent Hospital use. With regard to its historic, aesthetic and technological/research criterion, Graythwaite retains remnants both in its building fabric and its landscape from the earliest development of the North Shore and is considered rare and of state significance.
SHR Criteria g) [Representativeness]	The social criterion is assessed as representative, reflecting the choice of the North Shore, particularly North Sydney, for development of substantial residences and its later association with health care since 1916.

Source: Heritage Branch Database

Attachment B: SHR Curtilage

Heritage Council of New South Wales

Plan under the Heritage Act, 1977



State Heritage Register

Gazettal Date: 1 November 2002

0 12.5 25 50 75 100 Meters

Scale: 1:1,500

Produced by: S. Watters

Legend

- SHR Curtilage
- Historic Regions
- LGAs
- Land Parcels
- Water
- Roads
- Railways
- NSW Reserves

Attachment C

Proposed Concept Plan Stage	Information required to allow proper assessment	Proposed Heritage Branch/Council involvement in Part 3A process
Stage 1		
<ul style="list-style-type: none">o Conservation and refurbishment of the Graythwaite House (the house), Coach House, Tom O'Neill building and associated garden area (the house will not be used for school classes but rather for administrative support and other activities, including perhaps the School archives)	Detailed heritage assessment of these properties in a CMP including a maintenance schedule	CMP to be submitted with Draft EA. Applicant to seek endorsement from heritage Council at this stage following stages would be "subject to endorsement of CMP at Stage 1".
<ul style="list-style-type: none">o Drainage and Stormwater improvements, site levelling and landscaping of the site (significantly on the middle and lower terraces)	SoHI identifying the impact of any changes to the landscape (site levelling)	Addressed in SoHI to be submitted with Draft EA
<ul style="list-style-type: none">o Transport, traffic, parking and access improvements to the Graythwaite and Shore sites (spread over Stages 1 to 3)		
<ul style="list-style-type: none">o Miscellaneous works including site fencing		
<ul style="list-style-type: none">o No anticipated increase in student or staff population		
Stage 2		
	CMP should discuss the significance of this area and why the buildings should be located here	Amend text as follows: "Potential development of a new building which may be used for education or administrative purposes. Location of this building to address endorsed CMP"
<ul style="list-style-type: none">o Development of a new building to the north of the house which may be used for education or administration purposes	SOHI including discussion including how the proposed building forms address the significance of the site	SoHI for Stage 2 to be submitted to heritage Branch for Director comment and to DoP Approval
<ul style="list-style-type: none">o Demolition of the Ward building to the east of the house	Heritage Assessment of the significance of this item	Demolition subject to assessment of the heritage assessment by Heritage Branch with comments provided to DoP

	CMP should discuss the significance of this area and why the buildings should be located here	Amend text as follows: "Potential development of new buildings which may be used for education or administrative purposes. Location of this building to address endorsed CMP"
o Construction of two new buildings to the east of the house for classrooms, teaching or other educational facilities	SOHI including discussion including how the proposed building forms address the significance of the site	
o Capacity or potential to accommodate approximately 100 students and 10 staff		N/A
Stage 3		
	CMP should discuss the significance of this area and why the buildings should be located here	Amend text as follows: "Potential development of new buildings which may be used for education or administrative purposes. Location of this building to address endorsed CMP"
o Construction of two new buildings to the west of the house for classrooms, teaching or other educational facilities	SOHI including discussion including how the proposed building forms address the significance of the site	SoHI for Stage 3 to be submitted to heritage Branch for Director comment and to DoP Approval
o Capacity or potential to accommodate approximately 400 students and 40 staff		N/A
o Potential demolition of the Tom O'Neill Centre	Heritage Assessment of the significance of this item within the CMP	Amend text as follows: "Demolition to address endorsed CMP"

Attachment D: Proposed Draft DGRs

The EA shall be comprised of the EA document and a Conservation Management Plan (CMP). The CMP will be submitted to the Heritage Council, or their delegate, for formal endorsement **prior to approval of a final concept plan**.

The CMP should address the following at a minimum:

- Heritage Council guidelines on the preparation of CMPs
- Historical overview of the site
- Assessment of significance of the site and its component elements
- Statement of significance of the site and its component elements
- Schedule of works for the conservation and refurbishment of Graythwaite House.
- Proposed policies for each element within the SHR curtilage and a grading of the significance of the element and its contribution to the overall significance of the site.
- Provision of sufficient guidance for future stages of works.

The EA will make reference to the CMP to avoid duplication of information.