

20 September 2019

**Our Ref:** 19-098

**Mr David Gibson**

NSW Department of Planning, Industry and Environment  
320 Pitt Street  
Sydney NSW 2000

Dear Sir,

**RE: S4.55(2) MODIFICATION APPLICATION TO SSD 17\_8667 IN RELATION TO THE GOULBURN BASE HOSPITAL REDEVELOPMENT (130 GOLDSMITH STREET, GOULBURN)**

This statement has been prepared for NSW Health Infrastructure (HI) by City Plan Strategy and Development Pty Ltd (City Plan) to accompany an application under Section 4.55(2) of the Environmental Planning and Assessment Act 1979 (the Act).

**1. THE APPROVED DEVELOPMENT**

On 3 December 2018, the redevelopment of the Goulburn Base Hospital was approved by the former NSW Department of Planning and Environment, now known as the NSW Department of Planning, Industry and Environment (DPIE). Consent was granted under SSD 17\_8667 for the following development:

- *Construction of a new four storey acute clinical services building;*
- *Refurbishment of existing Ambulatory Care & Imaging/Emergency Department;*
- *Landscaping works;*
- *Demolition of vacated buildings; and*
- *Construction of new on-grade car parking and improved access and way-finding, including a new Ambulatory Services entry off Albert Street.*

Since that time, design development has been undertaken, resulting in a series of modifications to the approved development, as set out in this statement.

This statement should be read in conjunction with the following attached documentation:

- Architectural Plans prepared by Silver Thomas Hanley;
- Architectural Design Statement prepared by Silver Thomas Hanley;
- Wayfinding Signage prepared by Minale Tattersfield;
- Acoustic Statement prepared by Wood & Grieve Engineers;
- BCA and Accessibility Statement prepared by Blackett Maguire and Goldsmith;
- Civil Statement and Plans prepared by Bonacci Group NSW;
- Heritage Impact Assessment (Addendum) prepared by Perumal Murphy Alessi;

- Hydraulic and Fire Services Statement prepared by Arup; and
- Landscape Plans prepared by Space Lab.

## **2. PROPOSED MODIFICATION**

### **2.1. Overview of the Modifications**

The below provides a summary of the key modifications proposed. Reference to the amended Architectural Plans prepared by STH Architects (Appendix 1) should be made for further detail.

#### **Lower ground level:**

- The emergency department carpark and drop-off area has been amended to suit the modified building footprint, layout and hospital entry. This modification provides for a better line of site from reception to the front entry area and an opportunity for an art space.
- The main hospital's cumbersome, long switchback ramps and stairs have been removed and replaced with more legible stairs providing a better wayfinding outcome.
- The ambulance entry, access, logistics, loading dock and parking layouts have been amended, to accommodate the modified built form. The number of emergency parking spaces has been increased from 19 to 24 spaces. The staff fleet parking area has also increased from 29 to 32 spaces. Mortuary and hearse parking bays have also been included along the building's Faithful Street frontage.
- The hospital services plant has been relocated to southern side of the building. The plant has not increased in size or moved closer to sensitive users.
- The layout of the "emergency" and "medical imaging" departments have been amended to improve functionality. The "patient flow" (the department responsible for admissions, discharge and transfers) and "Triage & Emergency Care Services" (TECS) departments have been relocated.
- The building footprint has been widened at the lift core and central area to rotate lifts to face east.
- The landscape courtyard has been amended to only permit staff access.
- Retention of building 32, the "pathology/specimen/collection building, (which was previously approved for demolition) and demolition of the internal walls of that building. This building is of moderate heritage significance and its retention improves the new building's relationship with surrounding heritage buildings.

#### **Ground level:**

- The main hospital drop-off, short-term parking, front of house and entry area has been amended to accommodate the modified building footprint, layout and hospital entry.
- The layout of the "maternity", "birthing suites", "rehabilitation" and "pediatric" and "Geriatric Evaluation Management" (GEM) IPU departments have been amended to improve functionality.
- The east terrace has been reduced and relocated to accommodate revised building layout.
- The logistic and loading dock links have been amended to provide a more direct route.
- The link from the modified building to the existing hospital building has been amended to accommodate the new footprint/layout.
- A new canopy area is proposed over the amended ambulance parking area, to improve the entrance of the hospital for the arrival of patients and visitors.

- Bicycle parking has been relocated to the undercover area, for the convenience of users, adjacent to the amended main entry.

**Level 1:**

- A new canopy area is proposed over the hospital main entry and drop off area, to improve the presentation of the hospital's main entrance for visitors and patients.
- The layout of the "perioperative services", "surgical IPU" and "day surgery" departments have been amended to improve functionality.
- A sterile supply unit has been added to the functional layout within the building. The existing sterile supply unit will be re-purposed.
- The link to the existing "theatre" building is no longer required and has been removed.

**Level 2:**

- The layout of the "intensive care" and "medical IPU" departments has been amended to improve functionality.
- The building footprint has been extended to the west and increased setbacks provided along the northern elevation, which reduces the overall building envelope.
- A new external terrace has been provided to the "palliative care" department.
- The building footprint has been reduced along the western elevation.

**Level 3 and Roof level:**

- The plant equipment and roof area layout has been amended to accommodate the amended layout of the new building. The plant equipment has not increased in size or moved closer to sensitive receivers.
- The level 2 footprint has been modified providing a flush soffit and angled roof form, which reduces the overall height of the new building.

**Façade and materials:**

- The façade has been amended, taking into consideration the site's heritage context, to include porcelain tiles of a variety of neutral colours and dimensions, which will comprise a vertical pattern/arrangement.
- Window locations have been adjusted to accommodate the modified internal layouts of hospital rooms.
- The façade has been amended to clearly delineate entry points along the façade of the building.
- Materials have been amended to include metal cladding, metal sheets for the roof, vertical louvres, aluminum window frames, porcelain stone tiles (as noted above) and CFC eave lining.

**Signage:**

Minor amendments to the location of external signage are proposed to accommodate the modified building envelope and location of the main entrance to the hospital. One (1) additional pedestrian direction pylon is proposed to delineate between the main hospital entrance and the emergency entry points. The location of several other signs, including the sky sign, main entry sign, emergency sign and several other directional signs require modifications to suit the new layout.

**Landscape:**

- Landscaping has been provided to the new entry of the carpark and to suit the new carpark layout, which encompasses tree planting, low hedging and accent parking to the perimeter of the carpark.
- Planting has been incorporated to the new batter areas, which includes new trees, shrubs and ground covers.
- Landscaping/paving and seating around the new ramps and stairs have been modified to match the new layout.
- Bicycle racks have been included on the landscape plans.
- Tree planting along Goldsmith Street has been amended to suit the location of services.
- Trees species have been amended to incorporate evergreen trees.
- The landscaping design has also been modified to take into account the modified layout and footprint of the building.

In addition to the above, modifications to the approved civil design is also proposed to facilitate the modified building envelope and footprint of the building.

The Capital Investment Value (CIV) of the project has not changed.

**2.2. Conditions to be Modified**

To give effect to the proposed modifications, this application seeks to modify the following conditions of consent:

*Table 1: Proposed conditions of consent modifications*

Condition	Proposed Modification
Condition A2	The proposal seeks to modify this condition to include the amended plans provided with this application.

The table below outlines the proposed changes required to Condition A2.

*Table 2: Amendments to Condition A2*

Architectural Drawings prepared by <del>Billard Leece and Peck Von Hartel</del> <b>Silver Thomas Hanley</b>			
Dwg No.	Rev	Name of Plan	Date
AA-00-00	A	Goldsmith Street Aerial View	13/09/19
AA-00-01	A	Goldsmith Street Main Entrance	13/09/19
AA-00-02	A	Emergency Department Entry & Dropoff	13/09/19
AA-00-03	A	Faithful Street Fleet Car Park	13/09/19
AA01-0101	D	Site Plan – Demolition	30/11/18
AA-01-01	A		13/09/19
AR-02-02	E	Site Plan – Proposed Main Works	23/08/18
AA-02-02	A		13/09/19
AR-10-01	J	Precinct Plan – Lower Ground	23/08/18
AA-10-01	A		13/09/19
AR-10-02	J	Precinct Plan – Ground Floor	23/08/18

AA-10-02	A		13/09/19
AR-10-03	J	Precinct Plan – Level 1	23/08/18
AA-10-03	A		13/09/19
AR-10-04	J	Precinct Plan – Level 2	23/08/18
AA-10-04	A		13/09/19
AR-10-05	J	Precinct Plan – Level 3	23/08/18
AA-10-05	A		13/09/19
AR-10-06	F	Precinct Plan - Roof	23/08/18
AA-10-06	A		13/09/19
AR-30-01	H	Sections AA & BB	23/08/18
AA-30-01	A		13/09/19
AR-30-02	H	Sections CC & DD	23/08/18
AA-30-02	A		13/09/19
AR-30-03	H	Sections EE, FF & GG	23/08/18
AA-30-03	A		13/09/19
AR-21-01	N/A	SSDA Report – Elevation North & South	-
AA-21-01	A	Elevations – North & South - SSDA	13/09/19
AR-21-01	N/A	SSDA Report – Elevation East & West	-
AA-21-02	A	Elevations – East & West	13/09/19
Option 1	14	Materials and Finishes	21/9/18
AA-21-03	-	Building Perspective	13/09/19
AA-98-0001	A	Shadow Diagrams – Summer Solstice	13/09/19
AA-98-0002	A	Shadow Diagrams – Winter Solstice	13/09/19
AA-98-0003	A	Shadow Diagrams – Equinox	13/09/19
Landscape Concept prepared by Space Lab			
SKP-001	H	Landscape Concept (only for Albert Street carpark)	30/08/18
SK001	H	Landscape Concept	07/08/2019
SKP-001	H	Carpark Screening (only for Albert Street carpark)	30/08/18
SKP-001	H	Heritage Entry	30/08/18
L-001	-	Entry Landscape	7/08/19
L-002	-	Fleet Carpark Landscape	7/08/19
L-003	-	Entry Landscape	7/08/19
L-004	-	Section A	7/08/19
L-005	-	Materials	7/08/19
Subdivision Plan prepared by Project Surveyors			
B4024	-	Plan Showing Proposed Lot Consolidation	July 2018
Wayfinding Signage prepared by Minale Tattersfield			
S-001	-	Site Plan	10/09/19
Sheet 1 of 1	A	Graphic Colour Specifications	23/08/18
S-002	-	Typefaces	10/09/19
Sheet 1 of 1	A	Graphic Specifications – Arrow &	23/08/18
S-003	-	Pictograms Colours & Arrows	10/09/19

Sheet 1 of 1	A	External Sign Locations (only for signs along Albert and Clifford Streets)	23/08/18
Sheet 1 of 1 S-006	-	North & West Elevation	10/09/19
Sheet 1 of 1 S-007	A -	External Vehicular Signs External Vehicular Signs – “Sign Family – Lower Ground Floor”, “Ground Floor”, “Specifications”, “Signage in Context”, “Example Sign Types” and “Renders”	<del>23/08/18</del> 10/09/19
Sheet 1 of 1 S-005	A -	<del>Detail Plan Lower Ground</del> Vehicular Circulation – Lower Ground	<del>23/08/18</del> 10/09/19
Sheet 1 of 1 S-004	A -	<del>Detail Plan Ground</del> Site Plan – Ground Level	<del>23/08/18</del> 10/09/19
S-008	-	External Vehicle Signs Sign Family – Ground Floor	10/09/19
S-009	-	External Vehicle Signs Renders	10/09/19
S-010	-	External Signs Specifications	10/09/19
S-011	-	External Signs Specifications	10/09/19
S-012	-	External Signs Sign Signage in Context	10/09/19
S-013	-	Internal Signage Example Sign Types	10/09/19
S-014	-	External Signs Specifications	10/09/19
S-015	-	External Signs Specifications	10/09/19
S-016	-	Lower Ground Sign Locations	10/09/19
S-017	-	Ground Sign Locations	10/09/19
S-018	-	Level 1 Sign Locations	10/09/19
S-019	-	Level 2 Sign Locations	10/09/19
S-020	-	Level 3 Sign Locations	10/09/19
S-021	-	Level Number Identification	10/09/19
S-022	-	Lift Direction Public & Staff	10/09/19
S-023	-	Direction Ceiling Suspended	10/09/19
S-024	-	Bulkhead Mounted Directional	10/09/19
S-025	-	Department Identification	10/09/19
S-026	-	Perpendicular Identification	10/09/19
S-027	-	Reception/ Staff Station Identification	10/09/19
S-028	-	Typical Room Identification	10/09/19
S-029	-	Typical Room Identification With Slider	10/09/19
S-030	-	Perpendicular Amenities Identification	10/09/19
S-031	-	Perpendicular Typical Room Identification	10/09/19
S-032	-	Bedroom Identification	10/09/19
S-033	-	Bed Identification	10/09/19
S-034	-	Bed Identification	10/09/19
S-035	-	Bay Identification	10/09/19
S-036	-	Braille Tactile	10/09/19
S-037	-	Braille Tactile Cont	10/09/19
S-038	-	Statutory & Utility Signage	10/09/19

Sheet 1 of 1	A	Detail Plan Level 1	23/08/18
Sheet 1 of 1	A	Detail Plan Level 2	23/08/18
Sheet 1 of 1	A	Detail Plan Level 3	23/08/18

\* Red highlights new additions

### 2.3. Justification for proposed modification

The proposed modifications have arisen as a result of the detailed design development of the project, to improve the efficiency of the building, provide an improved built form responding to the site's heritage context and to ensure the building can comply with BCA standards.

Following the approval of the SSD 17\_8667, HI commissioned a peer review of the design by Silver Thomas Hanley (STH), to determine whether there were any opportunities to improve the functional efficiency of the approved building layout and to provide a more sympathetic (external) design to the surrounding heritage items.

In response, the STH review identified a series of potential areas for improvement to enhance functional efficiency, which ultimately resulted in a reduction in the overall scale of the building, whilst maintaining the same number of beds, which was a key requirement to satisfy the demands of the local health district's growing population.

STH also reviewed the main entry points, taking into consideration the site's sloping topography. From this review, STH determined there were opportunities to improve the entry to the hospital to provide clear separate access paths and points for public, staff and logistics. This was achieved utilising the existing street network surrounding the hospital campus and the natural topography of the site.

Other changes made to the approved development, particularly in relation to the façade amendments, were aimed at providing a more sympathetic built form outcome to existing heritage items on the site. Amendments were also made to building materiality and signage to respond to current BCA standards.

### 2.4. Pre-lodgement consultation

A pre-lodgement meeting was held with the Government Architect NSW (GANSW) on 14 August 2019. The proposed modifications were presented and in summary, GANSW advised that it supports the amended built form, separation of entrances and the wayfinding strategy.

GANSW also provided additional recommendations for consideration, including:

- Further articulate the façade through positioning of windows and arrangement of panels to better reflect the proportions and rhythms of existing heritage buildings.
- Consider ways in which surface treatment to the main volumes of the central floor levels could reflect the compositional qualities of existing heritage buildings.
- Reconsider design of the entrance canopy so that it integrates with the new building.
- Ensure the sweeping driveway preferences public over cars, which should include careful consideration of surface treatment.
- Acknowledge the importance of the sweeping driveway and its heritage context through the landscape design.

- Continue to explore the spatial qualities of waiting rooms and breakout spaces to ensure amenity for patients, staff and visitors is prioritised.

The amended architectural plans have responded to, and taken into consideration, the above recommendations, by providing greater articulation through the re-positioning of windows and a utilisation of a greater variety of materials. Suitable separation distances have been provided to ensure the building responds to the surrounding heritage buildings, whilst the proposed canopy has been designed to be integrated with the new building.

HI met with Goulburn Mulwaree Council on 2 September 2019 to discuss the proposed amendments to the approved development. Council was in support of the modifications and the commencements of the development at that time.

## **2.5. Supporting Documentation**

The subject Section 4.55(2) Modification Application is supported by the following documentation: -

- Architectural Plans prepared by Silver Thomas Hanley (Appendix 1);
- Architectural Design Statement prepared by Silver Thomas Hanley (Appendix 2);
- Wayfinding Signage prepared by Minale Tattersfield (Appendix 3);
- Acoustic Statement prepared by Wood & Grieve Engineers (Appendix 4);
- BCA and Accessibility Statement prepared by Blackett Maguire and Goldsmith (Appendix 5);
- Civil Statement and Plans prepared by Bonacci Group NSW (Appendix 6);
- Heritage Impact Assessment (Addendum) prepared by Perumal Murphy Alessi (Appendix 7);
- Hydraulic and Fire Services Statement prepared by Arup (Appendix 8);
- Landscape Plans prepared by Space Lab (Appendix 9).

## **3. STATUTORY CONSIDERATIONS**

### **3.1. Section 4.55(2) of the Environmental Planning and Assessment Act, 1979**

Section 4.55(2) of the Environmental Planning and Assessment Act, 1979 (the Act), enables a consent authority to modify a development consent upon application being sought by the applicant or any other person entitled to the Act on the consent, provided that the consent authority as part of the assessment process take into consideration a range of matters, as addressed below.

#### **3.1.1. Substantially the same development**

The consent authority must be satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all).

The development, as modified would essentially and materially have the same essence, as described below.

- The subject modification application seeks to generally maintain the development consent as approved. The application is for modifications, generally limited to, the approved building footprint/envelope, internal layout, façade and materials, as discussed further below.



- Despite the modifications to the façade, the general principle of utilising a range of materials and neutral colours to break up the massing of the façade has been maintained, despite the change in façade design (refer to Figure 1 for a comparison of the approved and proposed facade). The amended façade design better responds to the heritage values of the site and area and is considered to result in a better visual outcome to the surrounding hospital campus and adjacent public domain.



Goldsmith street view, Previous scheme



Goldsmith street view, Current scheme

Figure 1: Photomontage comparison along Goldsmith Street (Source: Silver Thomas Hanley)

- The revised built form, incorporates a similar building envelope and footprint, retaining the approved "u-shape" envelope as the approved (refer to Figure 2), with a reduced GFA and overall height, thereby improving shadowing and visual massing impacts to the surrounding environment, which will be discussed further in Section 3.1.5 of this Statement. The modifications to the built form ultimately seek to improve the functionality of the building and the relationship of the building with adjacent areas and buildings within the hospital campus.

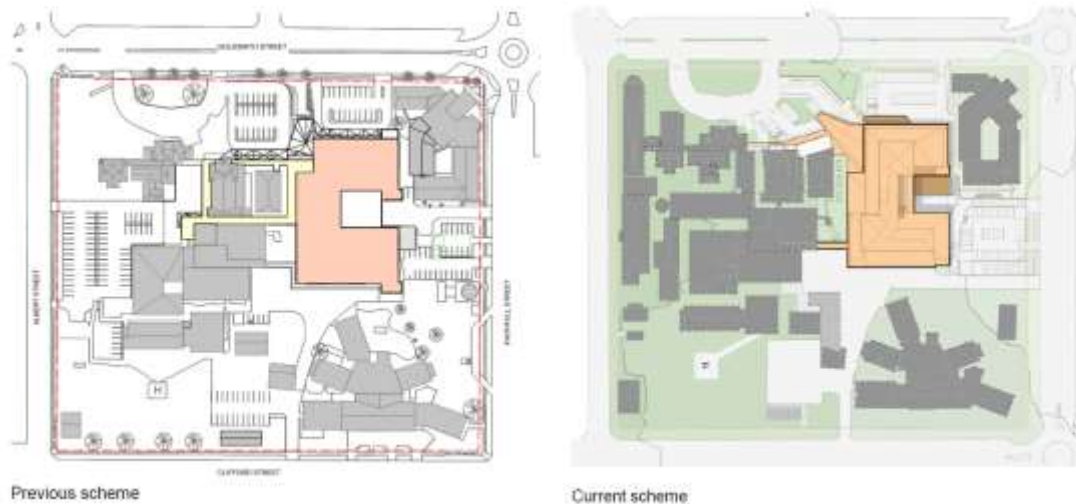


Figure 2: Comparison of approved vs proposed scheme (Source: Silver Thomas Hanley)

- The modifications do not seek to modify the number for approved beds or staff numbers, therefore no changes to the nature or intensity of the use are proposed.
- There will be an increase of 1 parking space on the site, which is not anticipated to result in any material increase in traffic generation.
- As noted above, the modifications are mainly limited to the building footprint and envelope, therefore there are no significant changes to the relationship of the modified building to adjoining properties. Additionally, the changes do not impact the use of the site as a “hospital”, the intended function of the buildings and its internal departments.
- The modifications to the façade and materials, improve the relationship of the building to the surrounding heritage items.
- Amendments to the approved signage are also proposed, primarily to respond to the amended façade design and building footprint/layout, but the general locations, design and function will remain unchanged.

Accordingly, the proposed modifications do not change the essential features of the approved development and therefore, the amended proposal is “substantially the same development”.

### 3.1.2. Section 4.15(1) matters for consideration

(a) *The provisions of:*

- (i) *any environmental planning instrument, and*
- (ii) *any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*

- (iii) any development control plan, and*
  - (iia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and*
  - (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),*
  - (v) (Repealed)*
- that apply to the land to which the development application relates,*

Refer to Section 3.2 of this statement.

***(b) The likely impacts of the development, including environmental impacts on both the natural and built environments, and the social and economic impacts in the locality.***

In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in Section 4.15(1) as are of relevance to the development the subject of the application.

**Built Form/Visual Massing**

Table 3 outlines the development statistics of the approved development when compared to the modified development. The modifications result in an 800mm reduction in height and 328 sqm reduction in GFA (refer to Architectural Design Statement at Appendix 2 for further detail).

*Table 3: Comparison of development statistics*

	Height	GFA
Approved	675.610 RL or 22.085 metres	12, 072 sqm
Proposed modifications	674.810 RL or 21.285 metres	11,744 sqm
Reduction	800 mm	328 sqm

Figure 3 illustrates a comparison of the proposed modifications to the built form, which has ultimately decreased the height and GFA of the approved built form.

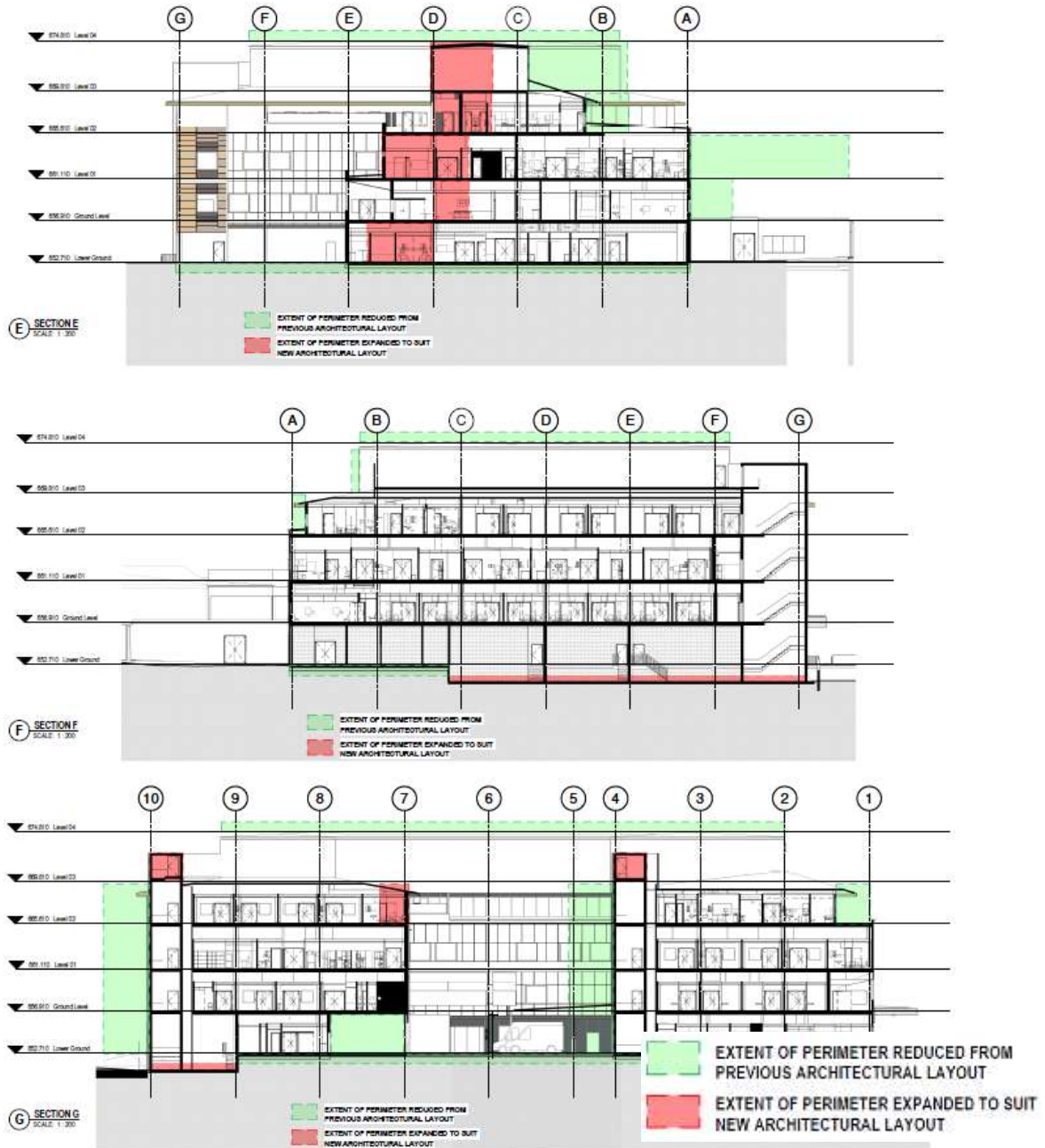


Figure 3: Sections comparison (Source: Silver Thomas Hanley, 2019)

The form of the building has been simplified and incorporates parapeted and low-pitched roof forms which reduces the overall height by 800mm, to 21.285 metres, reflecting and complementing the character of the heritage buildings on the site and within the surrounding conservation area. Whilst the building comprises four storeys, the proposed lower ground level of the amended building is below the ground level of existing buildings and upper levels of the building have been setback to reduce the apparent bulk and scale of the structure. Darker recessive colours and “lighter” building materials are also proposed for the upper levels, when compared to the approved development (refer to Figure 4) to again break up the overall massing of the building and provide a more sympathetic built form outcome on the site.

The proposed stone-look porcelain tiles and vertically proportioned windows articulate the façade and are intended to interpret the finer grain of the adjacent heritage buildings in a contemporary manner, which was not provided in the facade design of the approved development. Potential impacts associated with visual massing, when viewed from neighbouring properties and residential areas, are also reduced by the setbacks and separation of the amended building envelope (refer to Figure 4), use of low scale linkages and enhanced landscaping, courtyards and planting between the buildings.



North View, Previous Scheme



North View, Current Scheme

Figure 4: Photomontage comparison (Source: Silver Thomas Hanley)

The amendments also propose to retain existing building #32 (“pathology/specimen/collection building”) as shown on the architectural plans at Appendix 1, as it was previously approved to be demolished. This assists to realign the main entry point and provide a more direct visual and physical connection to the lift core and vertical circulation in the new building, whilst improving the site’s relationship with the surrounding heritage buildings.

Both level three and level four of the new building are setback from the lower levels to reduce visual massing (refer to Figure 5). This further allows the building envelope to blend with the existing hospital buildings. The main entry also provides a better definition of this key access point.

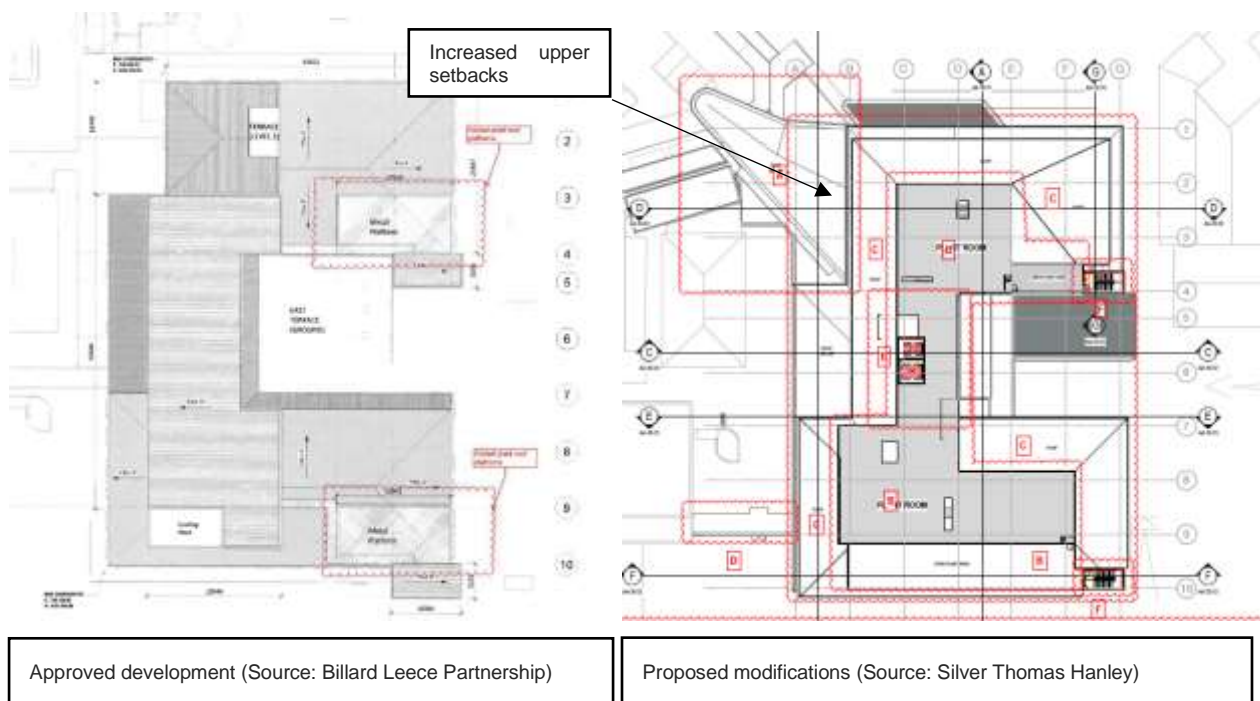


Figure 5: Site Plan Comparison

**Environmental Amenity**

STH has undertaken a mid-winter shadow analysis and has included shadow diagrams as part of the amended Architectural Package (Appendix 1).

Figure 6 provides a comparison of shadow impacts of the approved built form and the modified built form during the winter solstice. As with the approved development, the proposed modifications will not adversely impact solar access on the site or throughout the surrounding locality, including any residential properties or public open space areas.

Solar access within the site is improved, in particular between 12pm and 3pm during the winter solstice, along the hospital’s main frontage, Goldsmith Street, due to the reduced building footprint, increased setbacks and modified location of the approved building. Minor additional overshadowing is generated from

the proposed amendments, however, is insignificant and is concentrated only within the boundaries of the existing hospital campus

It is concluded that there will be no overshadowing of surrounding properties as a result of the proposed modifications. The proposed modifications provide an improved outcome to provide a high level of environmental amenity within the site and throughout the surrounding locality.

Further to the above, given the proposal retains the 4-storey built form, incorporating greater setbacks, appropriate landscaping and essentially the same "u-shape" building envelope, it will not result in any adverse impact by way of visual privacy, view loss or wind.



Figure 6: Shadow analysis comparison (Winter Solstice 12pm) (Source: Silver Thomas Hanley)

**Landscape**

Space Lab has prepared amended landscape plans (Appendix 10) to accommodate the modified building envelope and footprint. The modified plans provide suitable landscaping to the boundary of the hospital

(refer to Figure 7), providing a buffer to adjacent residential areas. Appropriate plantings have been proposed, including hedging, screening and evergreen plant species, to complement the character of the area

The proposed modifications to the approved landscape design will also improve and soften the development when viewed from the site's street frontages yet allow continued views along both streetscapes.

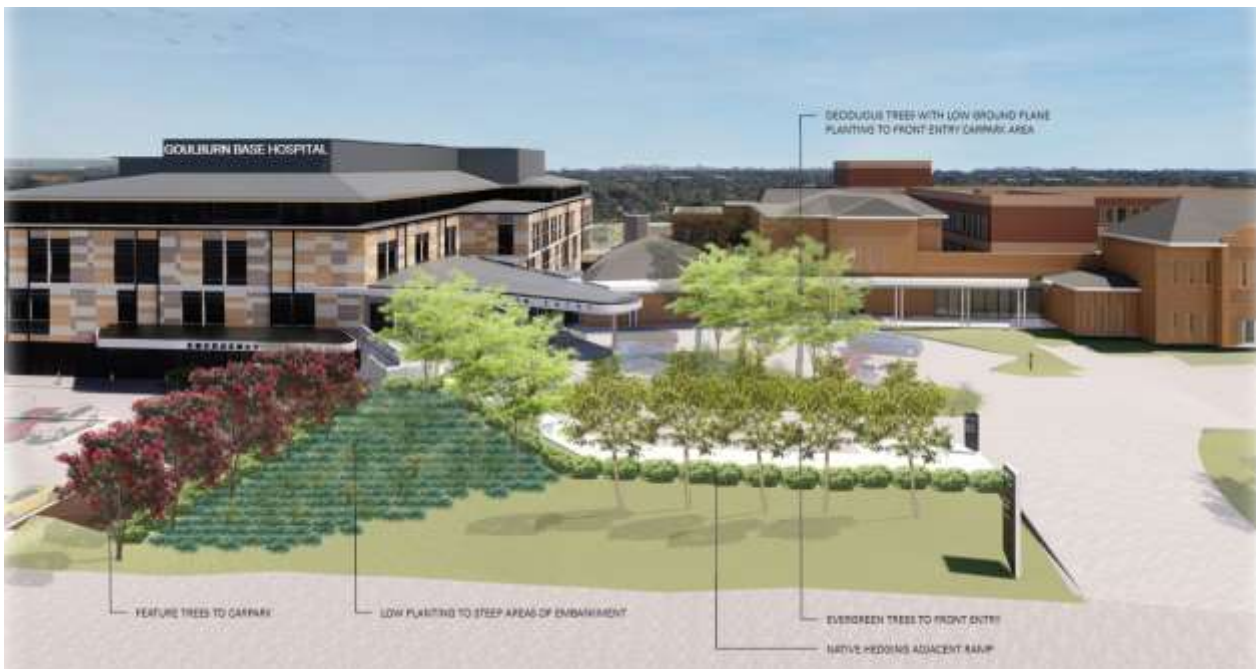


Figure 7: Proposed modifications to landscape plans (Source: Space Lab)

## Parking

Given the proposal does not result in an intensification of the approved use, i.e. there is no change in bed or staff numbers, there will be no additional demand for parking generated as a result of the proposed modifications. Notwithstanding this, the design review by STH determined that amended layouts of parking areas could accommodate one (1) additional parking space, providing a total of 197 space. The table below provides a comparison of the approved and current parking numbers.



Table 4: Comparison of parking space (Source: Silver Thomas Hanley)

SITE WIDE PARK SPACE NUMBERS			
PREVIOUS APPROVED SCHEME			CURRENT SCHEME
MAIN ENTRY PARKING SPACES	21	-2	MAIN ENTRY PARKING SPACES 19
EMERGENCY PARKING SPACES	22	+2	EMERGENCY PARKING SPACES 24
FLEET PARKING SPACES	30		FLEET PARKING SPACES 30
SOUTHERN PARKING SPACES	31		SOUTHERN PARKING SPACES 31
WESTERN PARKING SPACES	72	+2	WESTERN PARKING SPACES 74
NORTHERN PARKING SPACES	20	-1	NORTHERN PARKING SPACES 19
<b>TOTAL PARKING SPACES =</b>	<b>196</b>	<b>+1</b>	<b>TOTAL PARKING SPACES = 197</b>

We are therefore satisfied that sufficient onsite parking is provided and the proposed modifications will not generate any additional demand for parking. Traffic generation is addressed below.

**Traffic Generation**

Given the proposal does not result in an intensification of the approved use, i.e. there is no change in bed or staff numbers, and only one (1) additional parking space is proposed, we do not anticipate there will be any adverse traffic generated as a result of the proposed modifications.

**Accessibility and BCA**

Blackett Maguire and Goldsmith have prepared a BCA Compliance and Accessibility Statement (Appendix 5), which states that the proposed amendments can comply with the BCA deemed-to-satisfy and Performance Solutions satisfying the relevant BCA Performance Requirements.

**Heritage**

Perumal Murphy Alessi has prepared a Heritage Image Assessment (Addendum) (Appendix 7). The findings of the addendum are addressed below.

The proposed modifications retain and do not alter the buildings or elements that are of “exceptional” or “high” cultural significance and will continue to be highly visible and the historic elements along Goldsmith Street, the site’s main street frontage and will continue to make an active contribution to the locality.

The modifications reduce the footprint of the approved development and include improved connections and setbacks to existing and new buildings. There is clear and distinct separation between the hospital’s heritage buildings and the modified building, which will allow the heritage buildings to be clearly identified and interpreted from the new additions of the hospital.

Any potential heritage impacts are minimised by the:

- Retention of the street layout, subdivision pattern, site boundaries, street frontages, existing curved driveway/landscaping and setbacks.
- Retention of hospital and community service uses on the site.
- Use of existing vehicular access points.
- Separation of uses and provision of clear identification and path finding signage which is low scale.
- Separation between the “old” and “new” and use of low scale links and connections that will allow continued views to and from the historic pavilions and appreciation of the original architectural features.

- Reduction of the new building footprint and simplified building form that is intended to complement the existing buildings on the site.
- Reticulation of the building facades, setback of the upper levels, use of varying materials and low pitched and parapeted roof forms that reduce the apparent bulk and scale of the new building.
- Provision of open car park and landscaped areas with trees and plantings around the site.

The proposal has improved the efficiency of the new building and has also made use of the existing site topography and existing access points along both Goldsmith and Faithful Streets. The proposed changes will also improve and soften the street frontages and allow continued views along both streetscapes.

The architectural character has also been simplified and bulk and scale of the structure has been reduced by the reduced footprint, articulation of the building facades, setback of the upper levels and incorporation of lighter materials.

Perumal Murphy Alessi state that any potential adverse impacts will be reduced by the proposed landscaping modifications and improvements and ongoing use of the site as a hospital with associated community services and improved services for the short and longer term.

With regard to the above, we are satisfied that the proposed modifications to the approved development will not result in any adverse impact on the heritage values of the site and surrounds.

### **Noise and Vibration**

The proposed modifications do not propose an increase in staff or bed numbers. The amended architectural plans do, however, propose modifications to the shape and location of the plantroom, to include a greater setback from Goldmark Street, being the main frontage of the hospital.

Wood & Grieve Engineers (W&G) have prepared an Acoustic Statement (Appendix 4), which confirms that there are no changes which are likely to result in an increase in noise intrusion to nearby sensitive receivers. Specifically, no plant has increased in size or moved closer to any such sensitive receivers.

With regard to the above, we are satisfied that the proposed modifications will not result in any adverse impact in terms of noise and vibration.

### **Drainage & Flooding**

Bonacci Group NSW have prepared a Civil Statement and Amended Civil Plans (Appendix 6), which outlines the proposed civil design amendments required to accommodate the proposed modifications to the building design. The amendments include:

- Amended stormwater network to match amended architectural layout;
- Onsite detention location adjusted architectural layout and as-built services; and
- Inclusion of storm filter cartridges as an alternate proprietary water treatment measure.

All modifications have been annotated on the accompanying civil drawings, which comply with the applicable water quantity and quality requirements.

### **Other Considerations**

The proposed modifications do not change the original assessment undertaken by the Department of Planning, Industry and Environment in relation to other environmental considerations assessed as part of SSD 17\_8667, in relation to Ecologically Sustainable Development (ESD), Contamination, Utilities and Waste.

***(b) The suitability of the site for the development.***

The site supports an existing hospital and is located in an established urban area and with all urban and infrastructure services available or capable of augmentation to meet the needs of the development. Investigations into contamination, geology, access and services for the approved development demonstrate that the site is suitable for the proposed development and capable of accommodating development of the intensity approved, subject to mitigation measures to manage impacts during construction and operation to protect the amenity of adjoining residents and patients, staff and visitors.

The suitability of the site has therefore been comprehensively addressed and considered by virtue of the granting of development consent by DPIE. The proposed modification is generally considered substantially the same development because there is no material change to the location, form, scale and function of the approved development. The suitability of the site, as such, remains unchanged.

***(c) The public interest.***

As demonstrated in this Statement, there are no unreasonable impacts that will result from the proposed development (as modified). In fact, the amended design will result in a more efficient building that better meets the needs of staff and visitors and better responds to the heritage values and context of the site and surrounds.

No public interest issues arise as a consequence of the proposed modifications. DPIE's intentions in imposing conditions to preserve the public interest are not affected, since the proposed modifications continue to give effect to those general intentions, simply in a more practical and achievable way.

### **3.2. Relevant Planning Instruments and Development Controls**

The principal planning controls and key considerations applying to the development are contained in:

- Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth);
- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- Biodiversity Conservation Act 2016;
- State Environmental Planning Policy (State & Regional Development) 2011;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No. 33 - Hazardous and Offensive Development;
- State Environmental Planning Policy No. 55 – Remediation of Land;
- State Environmental Planning Policy No. 64—Advertising and Signage;
- State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011; and
- Goulburn Mulwaree Local Environmental Plan 2009.

Further to the above, we note that the Goulburn Mulwaree Development Control Plan 2009 (GMDCP) provides more detailed provisions, supplementing the provisions of the GMLEP. However, pursuant to Clause 11 of SEPP SRD, Development Control Plans do not apply to State Significant Development. Therefore, the GMDCP does not apply to the subject modification which seeks to amend an approved SSDA.


Since there are no substantive changes to the approved development, the modified proposal remains consistent with the relevant provisions of those controls as detailed in the original application and as subsequently assessed by DPIE in granting the consent, with the exception of the following provisions, as described below.

### 3.2.1. State Environmental Planning Policy No.64 - Advertising and Signage

The aim of the State Environmental Planning Policy No.64 - Advertising and Signage (SEPP 64) is to improve the amenity of urban and natural settings by managing the impact of outdoor signage. Fourteen (14) signs were approved under SSD 17\_8667.

A description of the modifications to the approved signage scheme is described below.

Table 5: Proposed modifications to signs

Sign Type	Proposed Modification
Sky Sign	The general location remains the same, however has been marginally amended to accommodate the modified building envelope. The colour of the main building sign has been amended to provide appropriate visual contrast and to match the modified building materials.
Totem 8 Sign (TOT_8)	<p>An additional pedestrian direction pylon sign has been added, adjacent to the main entry (refer to Figure 8) to distinguish between the main and emergency entry points. This sign has the following dimensions - 1400H x 420W x 100Dmm.</p>  <p>Figure 8: New signage (Source: Minale Tattersfield)</p>

Main Entry Sign (ME)	The sign has been incorporated into the modified canopy of the building envelope. The approved font of the text remains the same, however additional spacing between the lettering is proposed.
Secondary Directional Pylon (SDIR_2) and Totem 3 Sign (TOT_3)	The position of the signs have been modified to accommodate the modified building envelope.
Emergency Sign (EM)	The location and size remain generally the same as the approved scheme, however has been modified to accommodate the proposed modifications to the building envelope.
Signs - PDIR1, PDIR5, PDIR6, SDIR2, TOT4, TOT7 and TOT9	The position of these signs have been slightly adjusted to accommodate the modified location of entry points.
Internal signage	Modifications to the colour accents are proposed to further assist with wayfinding.

Clause 8 of SEPP 64 (outlined below) details the provisions of granting consent to signage.

*8 Granting of consent to signage*

*A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:*

- (a) that the signage is consistent with the objectives of this Policy as set out in clause 3 (1) (a), and*
- (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 1.*

The table below provides consideration of the above relevant requirements.

Table 6: Clause 3 Compliance

Provision	Compliance
(1) This Policy aims: (a) to ensure that signage (including advertising): (i) is compatible with the desired amenity and visual character of an area, and	Achieved – refer to assessment against Schedule 1 criteria below.

<p>(ii) provides effective communication in suitable locations, and</p> <p>(iii) is of high quality design and finish, and</p> <p>(b) to regulate signage (but not content) under Part 4 of the Act, and</p> <p>(c) to provide time-limited consents for the display of certain advertisements, and</p> <p>(d) to regulate the display of advertisements in transport corridors, and</p> <p>(e) to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.</p> <p>(2) This Policy does not regulate the content of signage and does not require consent for a change in the content of signage.</p>	
---	--

With regards to consistency with the assessment criteria of Schedule 1 of the SEPP we consider that the proposed amended signage satisfies the following provisions as detailed below.

Table 7: Schedule 1 Assessment Criteria

Provision	Compliance
<p><b>1 Character of the area</b></p> <ul style="list-style-type: none"> <li>• Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</li> <li>• Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</li> </ul>	<p>The character of the area is not likely to be altered by the proposed modifications to the approved signs and the one (1) new pylon sign. The modifications are clear and streamlined, which will enhance ease of access for all visitors and staff of the hospital, providing better navigation to the modified hospital entrance.</p> <p>There is no theme for signage throughout the locality. Rather, the proposed modifications are responsive to the contemporary needs of the hospital whilst enabling clear identification of the site from its primary and secondary frontages.</p>
<p><b>2 Special areas</b></p> <ul style="list-style-type: none"> <li>• Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</li> </ul>	<p>The site is located in a heritage conservation area and is partly identified as heritage item 1181 "Goulburn Base Hospital, Central Building, Pavilions". The Heritage Impact Statement prepared by Perumal Murphy Alessi (Appendix 7), outlines that the "separation of uses and provision of clear identification and path finding signage which is low scale and compact and will not have</p>

	<p>any adverse impact on the historic buildings or area.”</p> <p>Given the minor nature of the modifications to the signs, there will unlikely be any impacts to surrounding residential areas or the adjacent Victoria Park.</p> <p>Additionally, there are no waterways or rural landscapes in the vicinity of the hospital.</p>
<p><b>3 Views and vistas</b></p> <ul style="list-style-type: none"> <li>• Does the proposal obscure or compromise important views?</li> <li>• Does the proposal dominate the skyline and reduce the quality of vistas?</li> <li>• Does the proposal respect the viewing rights of other advertisers?</li> </ul>	<ul style="list-style-type: none"> <li>• No views or vistas will be lost or compromised.</li> <li>• No. The signage is located at key entry points within and surrounding the hospital.</li> <li>• Yes</li> </ul>
<p><b>4 Streetscape, setting or landscape</b></p> <ul style="list-style-type: none"> <li>• Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</li> <li>• Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</li> <li>• Does the proposal reduce clutter by rationalising and simplifying existing advertising?</li> <li>• Does the proposal screen unsightliness?</li> <li>• Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</li> <li>• Does the proposal require ongoing vegetation management?</li> </ul>	<ul style="list-style-type: none"> <li>• The signage is appropriate given its location and is compatible with the existing streetscape.</li> <li>• Yes, the proposed modifications will contribute to the visual interest of the streetscape by the use of appropriate, modern and clear signs, which are consistent with the proposed modified materials for the façade of the building.</li> <li>• Whilst the modifications are associated with multiple signs, they are minor in scale, refined in nature and will not result in any visual clutter.</li> <li>• Not applicable.</li> <li>• Not applicable.</li> <li>• Not applicable.</li> </ul>
<p><b>5 Site and building</b></p> <ul style="list-style-type: none"> <li>• Is the proposal compatible with the scale, proportion and other characteristics of the site or</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed modifications will complement the design of the hospital building.</li> </ul>

<p>building, or both, on which the proposed signage is to be located?</p> <ul style="list-style-type: none"> <li>• Does the proposal respect important features of the site or building, or both?</li> <li>• Does the proposal show innovation and imagination in its relationship to the site or building, or both?</li> </ul>	<ul style="list-style-type: none"> <li>• The signage has been designed taking into account the design of the new building and the heritage qualities of the existing buildings/surrounding conservation area.</li> </ul>
<p><b>6 Associated devices and logos with advertisements and advertising structures</b></p> <ul style="list-style-type: none"> <li>• Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</li> </ul>	<p>Not applicable.</p>
<p><b>7 Illumination</b></p> <ul style="list-style-type: none"> <li>• Would illumination result in unacceptable glare?</li> <li>• Would illumination affect safety for pedestrians, vehicles or aircraft?</li> <li>• Would illumination detract from the amenity of any residence or other form of accommodation?</li> <li>• Can the intensity of the illumination be adjusted, if necessary?</li> <li>• Is the illumination subject to a curfew?</li> </ul>	<p>The proposed “sky light” is illuminated with a dimming function. It will not however result in any glare or safety hazards. The proposed modifications do not result in any other illumination devices.</p>
<p><b>8 Safety</b></p> <ul style="list-style-type: none"> <li>• Would the proposal reduce the safety for any public road?</li> <li>• Would the proposal reduce the safety for pedestrians or bicyclists?</li> <li>• Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?</li> </ul>	<p>No.</p>

Based on the above assessment, we are satisfied that proposed modifications to the approved signage scheme will have minimal impact on the site and surrounding locality. The proposed modifications are appropriate for the context and the heritage significance of the site and surrounds and will improve the operational functionality of the modified building.



### 3.2.2. Goulburn Mulwaree Local Environmental Plan 2009

The Goulburn Mulwaree Local Environmental Plan 2009 (GMLEP) is the primary Environmental Planning Instrument (EPI) applicable to the site.

Table 8: GMLEP Provisions

Provision	Comment
Clause 4.3 Height of buildings	<p>The proposed amended height of the building is 21.285 metres, which is an 800mm reduction when compared to the approved development.</p> <p>The maximum height as prescribed by the GMLEP is 8 metres.</p> <p>In accordance with Clause 5.12 of the GMLEP, the provisions of the GMLEP do not restrict or prohibit, or enable the restriction or prohibition of works associated with this proposal. As a consequence, development standards such as the maximum building height standard do not strictly apply to the development.</p>
Clause 4.4 Floor Space Ratio	There is no FSR applicable to the site.
Clause 5.10 Heritage Conservation	<p>The site is located in a heritage conservation area, and is partly identified as heritage item 1181 "Goulburn Base Hospital, Central Building, Pavilions".</p> <p>The Heritage Impact Statement prepared by Perumal Murphy Alessi (Appendix 7), outlines that the proposed modifications are considered acceptable from a heritage perspective. The architectural character of the new building has been simplified and bulk and scale of the structure has been reduced by additional articulation of the building facades, setback of the upper levels and incorporation of lighter materials and complementary building and roof forms, materials and colours.</p> <p>Refer to Section 3.15 of this statement for further detail.</p>

## 4. CONCLUSION

The proposal is for a Section 4.55 (2) application to the approved Goulburn Base Hospital Redevelopment. The Modification Application seeks to modify the consent issued on 3 December 2018, under SSD reference 17\_8667. In summary, the proposed Section 4.55 (2) application:

- is considered *substantially the same development* as the development for which consent was originally granted;
- is appropriate when assessed by reference to the relevant matters for consideration under Section 4.15 (1);
- will improve the design, functionality, presentation and relationship of the building to the surrounding area; and



- will have no adverse environmental impacts on the site, the properties in the vicinity of the site, resulting in no change to the overall building envelope, form, scale and function, as originally approved

The proposal as amended under this Section 4.55 (2) application warrants approval by DPIE.

Should you require any further clarification or information in respect to the application, please contact Anthony Kazacos (Associate) on (02) 8270 3500.

Yours Sincerely,

A handwritten signature in black ink that reads 'Mel Krzus' followed by a period.

**Mel Krzus**  
Director