

GOULBURN

Goulburn Base Hospital Redevelopment

BASE

HOSPITAL

State Significant
Development Assessment
(SSD 8667)

December, 2018

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Cover photo

Northern View - Goulburn Base Hospital, Goldsmith Street (Source: Peckvonhartel Architects)

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Glossary

Abbreviation Definition

AHD Australian Height Datum
BCA Building Code of Australia
CIV Capital Investment Value
CIP Community Involvement Plan

Consent Development Consent

Council Goulburn Mulwaree Council

Department Department of Planning and Environment

DPI Department of Primary industries
EIS Environmental Impact Statement
EPA Environment Protection Authority

EP&A Act Environmental Planning and Assessment Act 1979

EP&A Regulation Environmental Planning and Assessment Regulation 2000

EPBC Act Environment Protection and Biodiversity Conservation Act 1999

EPI Environmental Planning Instrument
EPL Environment Protection Licence

ESD Ecologically Sustainable Development

FRNSW Fire and Rescue NSW
GBH Goulburn Base Hospital

GMLEP Goulburn Mulwaree Local Environmental Plan 2009

Local Health District Southern NSW Local Health District

Minister Minister for Planning

OEH Office of Environment and Heritage

RMS Roads and Maritime Services
RtS Response to Submissions

SEARs Secretary's Environmental Assessment Requirements
Secretary Secretary of the Department of Planning and Environment

SEPP State Environmental Planning Policy

SRD SEPP State Environmental Planning Policy (State and Regional Development) 2011

SSD State Significant Development



This report provides an assessment of a State significant development (SSD) application, lodged by NSW Health Infrastructure (the Applicant), for the redevelopment of Goulburn Base Hospital (GBH) (SSD 8667). The site is known as Goulburn Base Hospital and is located at 130 Goldsmith Street, Goulburn. This site is comprised of 11 lots and is legally described as Lot 1 DP 133606 and Lots 1 to 10 DP 758468 (inclusive) and is located in the Goulburn Mulwaree local government area (LGA).

The proposal seeks approval for the demolition of existing buildings and structures within the existing hospital campus and construction of a new four storey Acute Servicing Building, new ambulatory care facilities entrance from Albert Street, construction of new parking spaces, construction of a new engineering compound and lot consolidation. Additional ancillary works proposed include business identification signage, integration of new works with existing hospital buildings, refurbishment of the existing Ambulatory Care and Imaging/Emergency Department, landscaping works and associated civil works. The new works will provide an additional 23 beds, eight oncology chairs and 54 additional on-site car parking spaces.

The proposal has a capital investment value (CIV) of approximately \$96 million and would generate up to 200 construction jobs and 45 additional operational jobs. The development is SSD under clause 14 of Schedule 1 to the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), as it involves development for the purpose of a hospital that has a CIV of more than \$30 million. Therefore, the Minister for Planning is the consent authority.

The proposal was publicly exhibited between 23 March 2018 until 23 April 2018. The Department of Planning and Environment (the Department) received a total of 13 submissions during the exhibition of the proposal, including eight submissions from public authorities, including Council, and five submissions from the public (none objecting to the proposal and one providing full support). An additional five submissions were received from public authorities in response to the Applicant's Response to Submissions (RtS). Issues raised in the submissions relate to heritage impacts, built form and landscaping, construction and operational traffic and parking impacts and developer contributions.

The Department has considered the merits of the proposal in accordance with the relevant matters under section 4.15(1), the objects of the *Environmental Planning and Assessment Act 1979*, the principles of Ecologically Sustainable development and issues raised in all submissions, as well as the Applicant's response to these.

The Department has assessed the merits of the proposal and found the key issues include: heritage impacts; built form and urban design; traffic and parking impacts; noise and vibration impacts; and developer contributions. The Department's assessment concludes that the proposal is suitable for the site, would not result in significant adverse environment or amenity impacts and would be generally compatible with the scale and form of the surrounding development. The Department has considered concerns raised in submissions and recommended conditions of consent requiring further mitigation and management measures.

In order to address concerns raised in public submissions regarding the impact of the proposed development on local on-street parking, conditions of consent have been recommended requiring the Applicant:

- deliver a minimum total 196 car parking spaces on-site as part of the redevelopment of GBH, providing a minimum 54 space net increase over the existing on-site car parking provisions.
- enter into an agreement with the NSW Department of Education for the establishment and use of a temporary carpark for the duration of construction works.

- prepare and implement a Green Travel Plan for GBH that includes appropriate review and management measures to ensure sustainable travel targets are met.
- provide a minimum 12 staff and eight visitor bicycle parking spaces and appropriate supporting end-of-trip facilities (i.e. lockers and showers).

The development is designed to provide improved medical and health infrastructure services through the replacement of the inefficient and out-dated medical facilities with new, purpose-built, modern health facilities that provides for improved medical and health services delivery. The impacts of the proposal have been addressed in the Environmental Impact Statement and can be adequately managed through the recommended conditions of consent.

The Department is satisfied that the subject site is suitable for the proposal and that it is in the public interest and recommends that the application be approved subject to conditions.



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This report provides an assessment of a State significant development (SSD) application for the redevelopment of the Goulburn Base Hospital (GBH) at 130 Goldsmith Street, Goulburn (SSD 8667).

The proposal seeks approval for:

- site preparation works involving demolition and remediation.
- construction of a new four storey Acute Services Building (ASB) and refurbishment works.
- building identification signage.
- landscaping and new car parking.
- ancillary services and infrastructure works, including a new hospital engineering compound.
- lot consolidation.

The application has been lodged by the NSW Health Infrastructure (the Applicant). The site is located within the Goulburn Mulwaree local government area (LGA).

1.1 Site description

The site is regular in shape and has an area of approximately 3.87 hectares. The site is legally described as Lot 1 DP 133606 and Lots 1 to 10 DP 758468 (inclusive) and is located approximately 700 metres northwest of the Goulburn central business district and 3.8 kilometres (km) northeast of the Hume Highway interchange.

The site is zoned SP2 Infrastructure – Hospital under *Goulburn Mulwaree Local Environmental Plan 2009* (GMLEP) and is mapped within the *Goulburn City Conservation Area* and contains a locally listed heritage item No. 181, being the Central Building and former Pavilions. The identified heritage item is also listed on the Department of Heath's section 170 Register (*Heritage Act 1977*).

The site (see **Figure 1**) forms part of the Goulburn Health Campus, under the management of the Southern NSW Local Health District (Local Health District). The site has a 210.69 m primary frontage to Goldsmith Street, secondary frontages of 186.56 m to Albert Street, 183.455 m to Faithfull Street and 210.305 m to Clifford Street. The site slopes from the north western corner of the site to the south eastern corner, falling approximately eight metres over approximately 250 m.

The site is currently occupied by GBH, which is generally comprised of existing interconnected hospital buildings varying in scale between one storey to four (tower form) storeys, a series of at-grade car parks located around the site, with vehicle access provided from all site frontages. The south western corner of the site remains clear and unobstructed and is reserved as a dedicated helipad (see **Figure 1**).

The site is well serviced by existing footpath infrastructure, with the Main Entrance on Goldsmith Street facilitating the main pedestrian, vehicle drop-off and ambulance hospital access movements. All site frontages are flanked by angled or parallel on-street car parking.

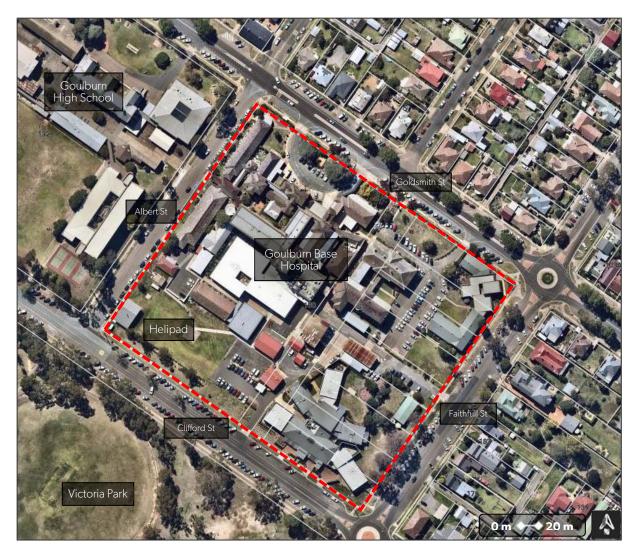


Figure 1 | Site Map (Base source: nearmaps)

1.2 Surrounding development

GBH is surrounded by varied land uses, with the site's north western frontage to Albert Street opposite Goulburn High School, while its south western frontage to Clifford Street lies opposite Victoria Park, which contains Goulburn Aquatic and Leisure Centre. The site's north eastern and south eastern frontages lie opposite existing, predominantly single storey, detached residential dwellings.

Beyond the site to the northwest lies The Crescent School and Wollondilly Public School, with the surrounding areas containing predominantly single storey, low density residential development.

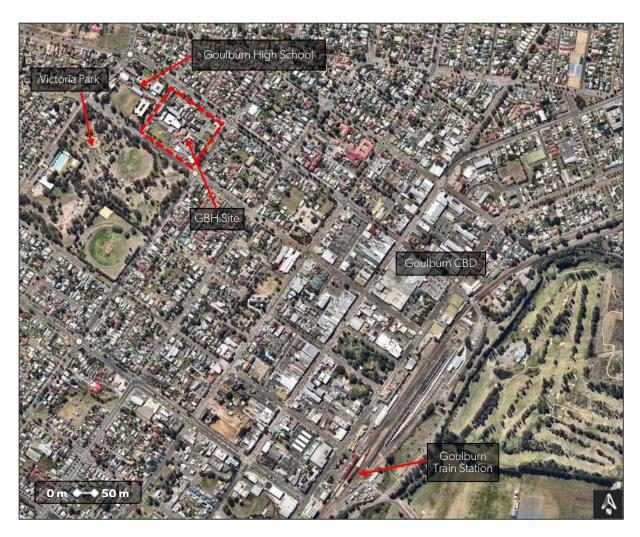


Figure 2 | Local Context Map (Base source: nearmaps)

1.3 Previous Approvals

In late 2017, the Applicant undertook a Review of Environmental Factors (REF) pursuant to the *State Environmental Planning Policy (Infrastructure) 2007* (infrastructure SEPP) for works to be undertaken as *'development without consent'* in accordance with Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Works approved under the REF include the decanting and demolition of: Lady Grose House; Springfield House (Community Mental Health Building); Asset Management Workshop; Asset Management Office; and bulk oxygen storage (a new bulk oxygen storage structure will be built and commissioned as part of the REF works). The above buildings and structure are all within the footprint of the proposed new ASB. Tree removal also forms part of the REF.

All works associated with the REF are scheduled to be completed early in 2019.



The proposed redevelopment of GBH will provide for the renewal of existing healthcare services provided by the hospital and will provide for 23 new hospital beds, eight oncology chairs and 45 new full time equivalent operational jobs. The proposed redevelopment will generally comprise of:

- site preparation works involving demolition and remediation.
- construction of a new four storey acute health services building.
- building identification signage.
- landscaping and new car parking.
- ancillary services and infrastructure works.
- lot consolidation.

The proposal will have a maximum building height of 22.085 m and provide 12,072 sqm of additional gross floor area (GFA). The façade design of the proposed four storey built form, as revised in the Applicant's Response to Submissions (RtS), has been designed and articulated to create visual interest and reduce the perceived bulk when viewed from the public domain. The proposed use of matte and muted colours and tones will present a refined façade design that is more in keeping with the heritage significant heritage precinct.

The EIS states that new landscaping works will be concentrated to the northern section of the site and within and around the perimeter of proposed new car parking areas to provide shade and to soften the proposed hardstand areas and proposed new built form. The landscape scheme has been designed to ensure that the existing heritage significance of the hospital precinct is respected and maximised, with the proposal improving the views to and the setting of the existing heritage listed hospital building fronting Goldsmith Street.

Site works will impact on 85 existing on-site car parking spaces, which are proposed to be replaced by four new on-site car parking areas that will provide 139 parking spaces, resulting in a net increase in total on-site car parking of 54 spaces.

Staff, patient and visitor vehicle access will be separated from operational ambulance and patient transport vehicle movements to improve efficiencies and minimise potential vehicle movement conflicts, with appropriate emergency vehicle signage proposed to assist with the management of vehicle movements. Patient drop off zones are proposed to be provided at the existing Goldsmith Street car parks closer to the main entry of the new hospital building.

The proposal also seeks approval for the consolidation of the hospital campus' 11 allotments into a single allotment.

The key components and features of the proposal (as refined in the RtS) are provided in **Table 1** and are shown in **Figures 3** to **11**.

Table 1 | Main Components of the Project

Aspect	Description		
Project Summary	Demolition and site remediation works and construction of a new, four storey Acute Services Building (ASB), refurbishment of existing hospital buildings, building identification signage, civil works and car parking and ancillary landscaping and infrastructure works.		
Site preparation	 Demolition of existing buildings including the front entry, reception, patient bed tower, procedure unit, paediatrics unit, antenatal clinic, maternity, west wing, CT and Eye, imaging, pathology/specimen collection, admin/admissions, Health Information Management, wound and pre-admission clinics, and medical records (see Figure 3). 		
	Demolition of existing on-site car parking areas in the north eastern sector of the site.		
	Site remediation works of identified areas of environmental concern (AEC).		
	 Site excavation works to facilitate the construction of new at-grade car parks, building structures and the proposed lower ground floor level, amounting to approximately two meters of cut. 		
Civil works	Diversion of existing overland flow path and stormwater infrastructure.		
	Construction of on-site detention system to limit stormwater flows from the site.		
	 Installation of bio-retention stormwater quality treatment measures to treat car park runoff. 		
	 Construction of retaining walls to account for level changes between the existing road and proposed car parks. 		
Built form	 Construction of a new four storey ASB, with a maximum building height of 22.085 m above existing ground level at Arcadia Street, comprising: lower ground floor level emergency department, triage emergency care services (TECs), general imaging, plant, and front of house. ground floor level sub-acute rehabilitation unit, maternity, paediatrics, front of house, pharmacy and outdoor terrace. first floor level perioperative, surgical and in-patient units (IPUs). second floor level intensive care unit (ICU), IPU, palliative care, ambulatory and outdoor terrace. third floor level plant. Construction of new linkages at the lower ground floor and first floor levels between existing theatres and new hospital building. Refurbishment of existing ambulatory care services, comprising: a new 8 chair oncology unit. medical day procedures and consult clinics, including specimen collection, located within vacated space of the Sub-Acute Rehabilitation Unit (SARU) building. integrated ambulatory care strategies incorporated into inpatient services. 		

- Refurbishment of existing imaging/emergency department to accommodate a pharmacy and retail uses.
- Construction of new car parking facilities at Albert Street, Goldsmith Street and Faithful Street.

Public domain and landscaping

- Construction of a new formal entry to the heritage hospital building, including:
 - o Goulburn Rose plantings to driveway perimeter.
 - o new pedestrian paths.
 - o new lawn area with low hedge planting to boundary and seating.
- Provision of new planting to new Goldsmith, Albert and Faithful Streets car parks for shade and screening.

Ancillary

- Construction of a new engineering compound comprising a fire hydrant, pump house, generator, hospital electrical substation, water tank, sprinkler booster set and OSD tank.
- Subdivision Lot consolidation of 11 existing lots into a single allotment.
- 38,790 sqm.
- Gross floor area (GFA) 12,072 sqm (additional).

Use

Hospital.

Access

- Pedestrian access proposed from existing Forest Road and Arcadia Street access point, comprising of a main pedestrian entry from Arcadia Street.
- Retention of existing vehicular access point along Arcadia Street.

Car parking

 Construction of 139 new car parking spaces, providing for a net additional 54 onsite spaces.

Bicycle parking

• Bicycle parking racks providing 12 staff and 8 visitors spaces.

Hours of operation

• 24 hours per day, seven days per week.

Construction hours

- 7 am to 6 pm, Monday to Friday.
- 8 am to 1 pm, Saturdays.
- No work on Sundays or Public Holidays.

Signage

Four façade signs and 10 pylon signs.

lobs

- Up to 200 construction jobs during the construction period (average of 120 on any given day).
- 45 operational jobs.

CIV

\$96,363,437.

The Department notes the design and built form of the proposal has been amended in the Applicant's Response to Submissions. However, these amendments primarily relate to internal layout amendments and minor positive amendments to the landscape scheme and external façade finishes to improve the design response of the proposal within its heritage setting.

Regarding development staging and decanting of existing health services and facilities within buildings that are proposed to be demolished, the Applicant has detailed the demolition of these buildings will not commence until the ASB is constructed and is operational. In this regard, the existing hospital buildings within the footprint of the proposed ASB are currently being demolished under the REF approval detailed in **Section 1.3** of this report.

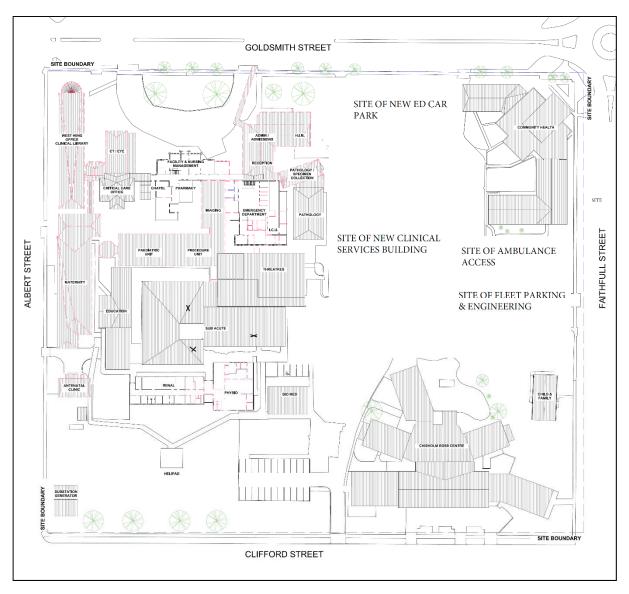


Figure 3 | Demolition Plan – buildings dotted red (Source: EIS)

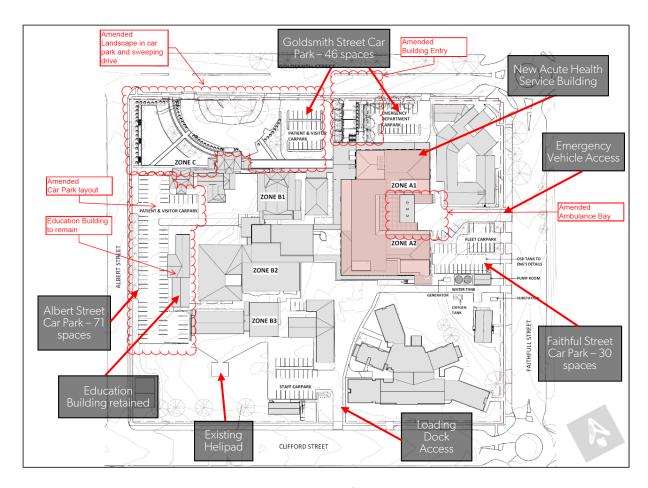


Figure 4 | Site Plan (Base source: RtS/Peck Von Hartel Architects)



Figure 5 | Northern Elevation (Goldsmith Street) (Base source: RtS/Peck Von Hartel Architects)



Figure 6 | Eastern Elevation (Faithful Street) (Base source: RtS/Peck Von Hartel Architects)



Figure 7 | Western Elevation (Albert Street) (Base source: RtS/Peck Von Hartel Architects)

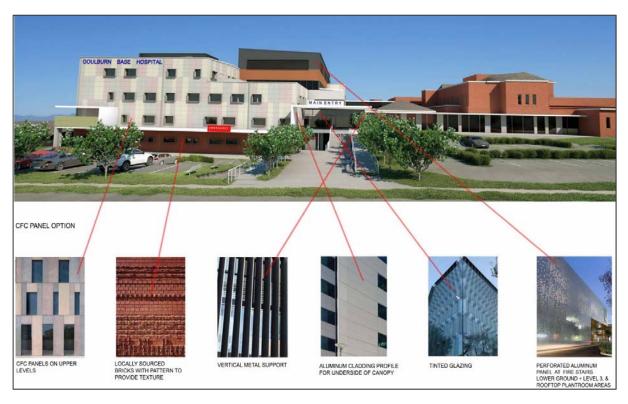


Figure 8 | Goldsmith Street Elevation Façade Treatment (Source: RtS/Peck Von Hartel Architects)



Figure 9 | Goldsmith Street streetscape perspective (Source: RtS/Peck Von Hartel Architects)



Figure 10 | Faithful Street streetscape perspective (Source: RtS/Peck Von Hartel Architects)

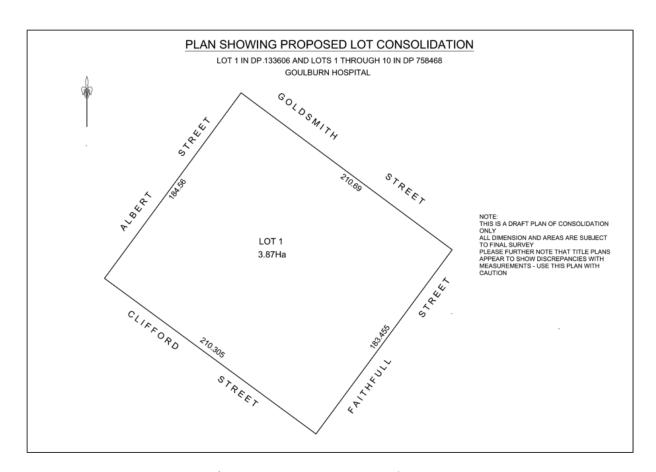


Figure 11 | Plan of Subdivision (Source: EIS/Project Surveyors)

3. Strategic Context

GBH is part of the Southern NSW Local Health District and is integral in providing health services to the region. GBH is the largest facility in the health district and is classified as a 'Level 4 District' facility that provides acute and sub-acute inpatient, mental health and community health services, servicing the northern sector of the SNSWLHD that extends from Crookwell in the north to Delegate in the south. The Applicant states that the proposal is critical to providing upgraded and contemporary healthcare services and address the pressing demands identified in the Goulburn Health Service Clinical Services Plan 2014 and will align with the strategic Commonwealth and NSW health objectives for the provision of health services to regional, rural and remote communities.

The Applicant states the redevelopment is critical to supporting and improving medical services in the Goulburn Mulwaree LGA and the wider South East Tablelands Region that will create additional jobs and provide significant social benefits for the local community. The proposed redevelopment will provide contemporary facilities that are more effective and efficient that have a greater capacity to meet the health care requirements of a growing aged population.

The Department considers that the proposal is justified from a strategic context given:

- it is consistent with the South East and Tablelands Regional Plan 2036, which identifies increased investment to improve health care services within Goulburn that will support its classification as one of six strategic centres.
- it is consistent with State Infrastructure Strategy 2018 2038 Building the Momentum as it would continue investment in health infrastructure to support a growing and ageing population and enable the delivery of modern health infrastructure that would support improved health outcomes for the people of regional NSW.
- it is consistent with the Future Transport Strategy 2056 as it provides improved health facilities within a regional centre, which would support its role as a regional hub for employment and services.
- it would provide critical public infrastructure to cater for the increased demand for health services required for an ageing population.
- it will provide direct investment in the region of \$96,363,467 and would support up to 200 construction jobs and 45 new operational jobs.

4.1 State Significant Development

The proposal is SSD under section 4.36 (development declared SSD) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the development has a CIV in excess of \$30 million (\$96.3 million) and is for the purpose of a hospital under clause 14 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011*.

The Minister is the consent authority under section 4.5 of the Act.

In accordance with the then Minister for Planning's delegation to determine SSD applications, signed on 11 October 2017, the Executive Director, Priority Projects may determine this application as:

- the relevant Council has not made an objection.
- there are less than 25 public submissions in the nature of objection.
- a political disclosure statement has not been made.

4.2 Permissibility

The site is zoned SP2 Infrastructure – Hospital under the GMLEP. The proposal is permissible with consent within the zone. Therefore, the Minister for Planning or a delegate may determine the carrying out of the development.

4.3 Other Approvals

Under Section 4.41 of the EP&A Act, a number of other approvals are integrated into the State significant development approval process, and consequently are not required to be separately obtained for the proposal.

Under Section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any development consent for the proposal (e.g. approvals for any works under the *Roads Act* 1993).

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent (see **Appendix C**).

4.4 Mandatory Matters for Consideration

4.4.1 Environmental Planning Instruments

Under section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument that is of relevance to the development the subject of the development application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs that substantially govern the project and that have been taken into account in the assessment of the project.

The Department has undertaken a detailed assessment of these EPIs in **Appendix B** and is satisfied the application is consistent with the requirements of the EPIs.

4.4.2 Objects of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent/approval) are to be understood as

powers to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at **Table 2**.

Table 2 | Response to the objects of section 1.3 of the EP&A Act

Objects of the EP&A Act		Consideration
(a)	to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	The redevelopment of GBH will ensure the proper management and development of suitably zoned land for the social welfare of the local community. The improved health care facilities will provide significant social and economic benefits to the community.
(b)	to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development.
(c)	to promote the orderly and economic use and development of land,	The redevelopment of the existing GBH site would meet the objectives of the zone to provide hospital related infrastructure. The redevelopment of the existing hospital campus to intensify the use would also be of economic benefit through job creation and infrastructure investment.
(d)	to promote the delivery and maintenance of affordable housing,	N/A
(e)	to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposal would not result in the loss of any threatened or vulnerable species, populations, communities or significant habitats.
(f)	to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The proposal provides a balanced response to the heritage qualities of the hospital precinct, proposing a contemporary built form response that respects the existing locally significant hospital building. Less contributory building elements from around the hospital precinct are proposed to be removed as part of this proposal, that will enhance the setting of the existing items. No significant impacts are on built and cultural heritage, including Aboriginal cultural heritage, are therefore considered likely by the proposal.

(g) to promote good design and amenity of the built environment,

The proposal has been reviewed by the Government Architect NSW throughout the assessment of the proposed development. The Department considers the application would provide for good design and be sympathetic to the amenity of the existing built environment (refer to **Section 6.2**).

 (h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants, The Department has considered the proposal and has recommended a number of conditions of consent to ensure the construction and maintenance is undertaken in accordance with legislation, guidelines, policies and procedures (refer to **Appendix C**).

 to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State, The Department publicly exhibited the proposal as outlined in **Section 5.1**, which included consultation with Council and other public authorities and consideration of their responses.

 to provide increased opportunity for community participation in environmental planning and assessment. The Department publicly exhibited the application as outlined in **Section 5.1**, which included notifying adjoining landowners, placing a notice in the press and displaying the application on the Department's website and at the Department's Sydney office and Council's office.

4.4.3 Ecologically Sustainable Development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle.
- inter-generational equity.
- conservation of biological diversity and ecological integrity.
- improved valuation, pricing and incentive mechanisms.

The Applicant proposes to target a Green Star - Healthcare (Green Building Council of Australia) 4 Star equivalency rating and proposes a range of ESD initiatives and sustainability measures in the design, including:

- water recycling options for non-potable uses.
- selection of water saving devices and fixtures to minimise water consumption, such as flow restrictions and WELS rating fixtures.
- metering of monitoring systems to improve operational efficiency.
- rainwater harvesting.

- fire system test water reuse.
- efficient irrigation systems, such as sub-surface drip irrigation.
- use of low embodied energy products.
- locally sourced materials.
- reused or highly recycled content, including reuse of materials from demolished buildings.
- resources manufactured using renewable energy sources.

The Department has considered the proposed development in relation to the ESD principles. The Precautionary and Inter-generational Equity Principles have been applied in the decision making process via a thorough and rigorous assessment of the environmental impacts of the proposed development. The proposal is consistent with ESD principles as described in Section 8.5 and Appendix 9 of the Applicant's EIS, which has been prepared in accordance with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

The site is not subject to any known effects of flooding and is not subject to bushfires. The site would not be impacted by changes in sea level resulting from climate change.

Overall, the proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives will encourage ESD, in accordance with the objects of the EP&A Act.

4.4.4 Environmental Planning and Assessment Regulation 2000

Subject to any other references to compliance with the EP&A Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

4.4.5 Planning Secretary's Environmental Assessment Requirements

The EIS is compliant with the Planning Secretary's Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

4.4.6 Section 4.15(1) matters for consideration

Table 3 identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided for in **Section 6** (Assessment) and relevant appendices or other sections of this report and EIS, referenced in the table.

Table 3 | Section 4.15(1) Matters for Consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Satisfactorily complies. The Department's consideration of the relevant EPIs is provided in Appendix B of this report.
(a)(ii) any proposed instrument	The Department's consideration of the draft EPIs is provided in Appendix B of this report.
(a)(iii) any development control plan (DCP)	Under clause 11 of the SRD SEPP, DCPs do not apply to SSD. Notwithstanding, consideration has been given to relevant DCPs at Appendix B .

(a)(iiia) any planning agreement	Not applicable.
(a)(iv) the regulations Refer Division 8 of the EP&A Regulation	The application satisfactorily meets the relevant requirements of the EP&A Regulation, including the procedures relating to applications (Part 6 of the EP&A Regulation), public participation procedures for SSD and Schedule 2 of the EP&A Regulation relating to EIS.
(b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	Likely impacts are proposed to be appropriately mitigated or conditioned - refer to Section 6 of this report.
(c) the suitability of the site for the development	The site is suitable for the development as discussed in Sections 3, 4 and 6 of this report.
(d) any submissions	Consideration has been given to the submissions received during the exhibition period. See Sections 4 and 5 of this report.
(e) the public interest	Refer to Section 5 of this report.

4.4.7 Biodiversity Conservation Act 2016

Under section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act), SSD applications are "to be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values".

The proposed works are not likely to have a significant impact on biodiversity values. The Office of Environment and Heritage and the Department have previously determined on 8 December 2017 and 19 January 2018, respectively, that the proposal is not required to be accompanied by a BDAR.



5.1 Department's Engagement

In accordance with Schedule 1 of the EP&A Act, the Department publicly exhibited the application from 23 March 2018 until 23 April 2018 (32 days). The application was exhibited at the Department and on it's website, at the NSW Service Centre and at Council's office.

The Department placed a public exhibition notice in the Goulburn Post on Wednesday, 21 March 2018 and Goulburn Post Weekly on Thursday, 22 March 2018, and notified adjoining landholders and relevant State and local government authorities in writing. The Department representatives visited the site to provide an informed assessment of the development.

The Department has considered the comments raised in the public authority and public submissions during the assessment of the application (**Section 6**) and/or by way of recommended conditions in the instrument of consent at **Appendix C**.

5.2 Summary of Submissions

The Department received a total of 13 submissions, comprising eight submissions from public authorities and five submissions from the general public (none objecting to the proposal). A summary of the issues raised in the submissions is provided at **Table 4** and **Table 5** below and copies of the submissions may be viewed at **Appendix A**.

5.3 Public Authority submissions

A summary of the issues raised in the public authority submissions is provided at **Table 4** below and copies of the submissions may be viewed at **Appendix A**.

Table 4 | Summary of public authority submissions to the EIS exhibition

Goulburn Mulwaree Council (Council)

Council resolved that it strongly supports the proposed redevelopment of GBH, however, provided the following comments for consideration:

- further analysis of traffic and parking impacts and demands generated during construction and operation is required and should be made available to Council and the public for further opportunity to comment.
- it is difficult to determine the final outcome for the precinct without details of the projected need for health care facilities into the future.
- the proposal attracts section 64 Developer Servicing charges and section 7.12 development contributions in accordance with Council's current policies, however, Council may consider exempting components of the relevant contribution where a comprehensive submission justifying the exemption is provided.
- the logistics and management of existing hospital operations need to be considered during construction.
- measures to address long term transport measures should be addressed as part of the proposed redevelopment to address the increased hospital services demand to be created.

- the EIS does not address how the proposal has addressed CPTED principles, specifically matters to mitigate opportunities for crime and assault.
- ancillary components of the proposal (i.e. air conditioning units and rainwater tanks) should be considered as part of this proposal and should be screened from public view.
- the proposed removal of some buildings graded as moderately heritage significant is considered acceptable in the context of enabling the ongoing and continuous use of the site for its original and intended purpose.
- the landscape design at the corner of Goldsmith and Albert Streets should be amended to provide a traditional design that is more in character with the 19th and 20th Century context and that provides greater visibility of the hospital buildings.
- a landscape proposal that responds to the scale of the development and expansive hard stand car parking
 areas is required to ensure is provides a positive and strong impact to the street and provides good
 amenity to car park users (e.g. shade trees).
- any proposed road closures should involve the prior consultation and approval of Council
- landscaping and lighting require on-going maintenance schedules to ensure their effectiveness for the life of the development.
- the site should be consolidated into one lot to comply with the BCA.
- no signages is included as part of the EIS, however, the GBH building identification and emergency signage should be assessed under SEPP No.64.
- the Applicant's reliance on clause 5.12 of GMLEP to support the building height exceedance is not applicable as this proposal is a new crown building and a clause 4.6 variation request under the GMLEP is requested.
- the Hazardous Building Materials Assessment should be updated to present details in relation to risk assessment, safe work procedures or control measures for dealing with the identified materials throughout the development.
- any vehicle crossovers/laybacks made redundant following the proposal should be reinstated to kerb and gutter and grass nature strip.
- the proposed landscape design does not respect the formality of the original hospital and there is insufficient planted area to reduce the visual impact of the new buildings and expansive paved parking areas.
- additional shade trees should be planted and tree No.54 should be retained in situ and the design of the
 proposed car park amended to suit given the significant visual contribution the tree provides to the
 character of the hospital precinct.
- the estimated developer servicing charges will be assessed under Council's new Development Control Plan and a calculated fee of \$607,440.35 is required.

Transport for NSW (TfNSW)

TfNSW did not object to the proposal, however, advised that:

- public transport movements should be updated in the Transport and Accessibility Statement and Preliminary Construction Traffic Management Plan to identify bus routes 818, 821A and 821B.
- drop-off and pick-up locations should ensure an 18-seater wheelchair accessible bus can be accommodated and allow for drop-off and pick-ups to be made by potential demand responsive vehicles.
- compliant accessible paths must be provided to existing bus stops.
- construction management plans should be developed to maintain pedestrian and bicycle movements
 along footways and cycleways at all times during construction activities and ensure appropriate diversion
 measures are put in place where road/footpath closures are required.
- wayfinding strategies and travel access guides should be developed to assist with increasing the mode share of walking and cycling.

Roads and Maritime Services (RMS)

RMS considered the proposal and noted that works are proposes to access within Goldsmith Street requiring concurrence under section 138 of the *Roads Act 1993*. It advised further that the application does not provide enough information to assess the proposal and required the following be addressed:

- clarification should be provided on the proposed new vehicle access arrangements from Goldsmith Street.
- a scaled plan is required showing:
 - o existing and proposed access arrangements at Goldsmith Street.
 - o proposed new car parking facilities at Goldsmith Street.

Heritage Division of the Office of Environment and Heritage (Heritage)

Heritage considered the proposal and provided the following comments for consideration:

- it is unclear why the proposal necessitates the demolition of the Specimen Collection/Pathology
 Collection and Reception buildings, which could be retained or adapted in the redevelopment and retain their identified moderate heritage significance.
- proposed car parking within the Goldsmith Street setback would benefit from a landscape design that softens this element to lessen the impact on the setting of the 1887 hospital building.
- signage could have an adverse impact on views to, from and within the site and affect the character of the place and should be limited.
- a Heritage Interpretation Plan should be developed to ensure heritage interpretation of the heritage significant buildings proposed to be demolished is implemented.
- the Statement of Heritage Impact has not demonstrated an adequate assessment of the study area to clarify the extent, integrity and significance of the archaeological resource on the site and mitigation measures appropriate to manage the potential resources.
- the EIS should be supplemented with a detailed historical archaeological assessment.
- an amended Statement of Heritage Impact should be prepared that considers a detailed options analysis
 describing the alternative solutions considered for the site and reasons why these options were
 discounted.

WaterNSW

WaterNSW does not object to the proposal, however, it provided the following comments for consideration:

- the EIS does not include an assessment of whether the proposal will have a neutral or beneficial effect on water quality.
- not enough detail of the proposed stormwater treatment measures have been provided to adequately assess their suitability.
- a MUSIC stormwater quality model and updated consistent Final Siteworks and Stormwater Drainage Plan must be provided which demonstrates a neutral or beneficial effect on water quality.

WaterNSW also recommended conditions of consent requiring the preparation of an Operational Environmental Management Plan and that the Sediment and Erosion Control Plans be updated to Soil and Water Management Plan.

Essential Energy

Essential Energy does not object to the proposal and advised that the proposal may be supplied by Essential Energy's existing 11kV network. However, it advised that further studies would be undertaken once a formal application is made.

Airservices Australia

Airservices Australia does not object to the proposal and advised that the proposed maximum height of the proposal would not affect any sector or circling altitude, nor any instrument approach or departure procedure at Goulburn Airport.

Civil Aviation Safety Authority (CASA)

CASA raised no objections to the proposal and advised it had no specific comments to make on the proposed redevelopment of GBH, noting that it would not infringe on the Obstacle Limitation Surface at Goulburn Aerodrome.

CASA recommended that plans for the crane operations (including lighting and marking of the cranes) be reviewed by the helicopter operators that use the helipad (e.g. operators of the air ambulances in the area).

5.4 Public submissions

A summary of the issues raised in the public submissions is provided at **Table 5** below and copies of the submissions may be viewed at **Appendix C**.

Table 5 | Summary of the public submissions to the proposal

Issue

Car Parking

- On-street parking in areas surrounding the hospital are overcrowded by hospital related activities and adequate on-site car parking should be provided for all employees, visitors and day patients and ancillary health care workers.
- A multi-storey car park should be provided on-site to address off-site car parking impacts generated by the hospital.
- Information of temporary car parking during construction should be provided to ensure that appropriate measures are in place.
- Ongoing car parking issues will persist post the construction period as there is no designated employee parking areas identified.

Built Form and Heritage

• The design of the proposal will date very quickly and should be in keeping with the heritage style of the community, such as using a brick façade.

Project Scope

- The project should be reviewed to be bigger and better in every way to provide long term benefits for the whole community and to address future health needs.
- The internal design and layout of the redevelopment should ensure adequate facilities are provided to assist with patient recovery (i.e. access to services, natural environment and ability to interact with other patients).

General

• Construction activities associated with the proposal will cause both mental and physical issues relating to parking impacts and construction noise impacts.

5.5 Response to Submissions

Following the exhibition of the application the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised in the submissions.

On 4 October 2018, the Applicant provided an Response to Submissions (RtS) (**Appendix C**) on the issues raised during the exhibition of the proposal. The RtS provided additional responses and proposed several amendments to the proposal in response to comments received during the exhibition period as follows:

- amendments to the design and built form resulting in a minor building height and GFA increase, comprising:
 - o building façade amendments, including the use of compressed fibre cement panels and articulated metal anodised powder-coated window shading.
 - o semi-enclosure of the fire stairs -enclosed with anodised exterior louvres to eliminate the need for stair pressurisation.
 - o amendments to the north-facing articulated awning, entry canopy and signage to delineate separate functional elements.
 - o Goldsmith Street east-west corridor, connecting between the new hospital building and heritage buildings, amended to transparent glass link to better define 'new vs old'.
 - o cladding of rooftop plantroom with matt basalt metal sheeting finish to become a recessive element.
 - o amendments to the lower ground floor level internal layout to improve patient flow and departmental adjacency and to accommodate TECs.
 - o amendments to the ground floor level internal layout to improve patient flow and departmental adjacency, to delete the ground floor level link from the existing hospital to the new building, to add ensuites to maternity rooms and to reduce the size of internal terrace.
 - o amendments to the first floor level internal layout to improve patient flow and departmental adjacency and to remove the cantilevered corridor on the northern side of the perioperative wing.
 - o amendments to the second floor level internal layout to improve patient flow and departmental adjacency, to relocate the TECs to lower ground floor level which reduces the size of the building envelope on the western elevation and to introduce a roof terrace on the western side of the ICU.
 - o modification to the ambulance bays to provide additional patient transfer vehicle bays and ambulance waiting bays.
 - o modifications to the arrangement of the Albert Street on-site car parking to facilitate the retention of the Education Building.
 - o amendments to the site landscape scheme in consultation with the heritage consultant to provide a more sympathetic design response and provide for additional landscaping along site frontages.
- amendment to the proposal to seek development consent for the consolidation of the site into one lot.
- amendment to the proposal to seek development consent for business identification signage, including four façade signs, 10 pylon signs and an indicative wayfinding signage strategy.

- amendment to the proposal to seek development consent for remediation following the undertaking of
 additional investigation regarding potential site contamination, which identified the requirement to prepare
 a remediation action plan (RAP) to address identified contaminants.
- clarification that the proposal would not exceed threshold quantities in SEPP 33 and was therefore not considered not to be a potentially hazardous facility.
- additional justification for the proposed demolition of heritage significant built form and the development option selected.
- submission of a revised Acoustic Report, that includes seven days of background noise monitoring in accordance with the Noise Policy for Industry.
- submission of an addendum Transport and Accessibility Assessment.
- submission of correspondence from a heritage consultant that assesses the proposed amendments and the impact of those amendments on the heritage significance of the site and surrounding locality.
- submission of a detailed Archaeological Assessment.
- submission of updated/revised proposed mitigation measures for the proposal.

The RtS was made publicly available on the Department's website and was referred to the relevant public authorities. An additional four submissions were received from public authorities, including Council, TfNSW, Heritage and the EPA. A summary of the issues raised in the submissions is provided at **Table 6** and copies of the submissions may be viewed at **Appendix A**.

Table 6 | Summary of public authority submissions to the RtS

Council

Council's review of the Applicant's RtS noted that some aspects of its original submission have been addressed. However, it provided the following additional comments for further consideration:

- Council accepts the Applicant's section 64 Developer Servicing calculation of \$450,681.60 rather than Council's originally quoted \$607,440.35.
- augmentation works are required to allow for a 225 mm sewer connection to Faithful Street and must be completed at the cost of the developer prior to the occupation of the development.
- Council has no plans to change water pressure zones in the vicinity of GBH and any additional water pressure required must be provided on site at the developer's expense.
- the submitted draft Green Travel Plan (GTP) does not include any actions that can be identified or monitored by Council or other statutory planning authority.
- all plans should consistently reflect proposed bicycle storage locations and it is recommended that lockers or secure indoor storage locations be provided to mitigate against the risk of theft for shift workers or after hours visitors.
- Council does not support the Applicant's request for an exemption from the payment of section 7.12
 development contributions due to the increased burden the proposal will place on existing infrastructure
 and services.

- the Applicant should demonstrate that consideration has been given to wayfinding, lighting and safety when walking to cars at night during both construction and operation.
- Council strongly advocates that a future multi-storey car park be considered in all designs to address the ongoing demand for car parking provisions at the hospital.
- Council is concerned the Applicant has failed to adequately consider the parking requirements for
 construction and ongoing operations of GBH and insists that meaningful consultation and negotiations on
 managing the parking needs in and around the hospital are completed prior to any physical work
 commencing.

Heritage

Heritage also reiterated its position that, if possible, every effort should be made to retain the Specimen Collection/Pathology Collection and Reception buildings as part of the proposed redevelopment.

TfNSW

TfNSW raised no objections to the amendments outlined in the RtS and recommended a condition of consent requiring the preparation of a construction pedestrian and traffic management plan.

Environment Protection Authority (EPA)

The EPA raised no objections to the proposal and advised it had no comments.

RMS

RMS advised that not enough information was presented to enable an assessment of the proposal and sought additional information relating to:

- staging of the proposal to ensure sufficient parking is available for the hospital throughout construction activities.
- location of temporary parking (if required), including site plans.

The Applicant provided a Supplementary RtS in response to the additional comments received regarding:

- section 64 developer servicing charges.
- section 7.12 development contributions.
- built form and scale.
- car parking impacts.
- the effectiveness of the proposed draft GTP.
- wayfinding.
- landscaping.



The Department has considered the EIS, the issues raised in submissions and the Applicant's RtS in its assessment of the proposal. The Department considers the key issues associated with the proposal are:

- heritage impacts.
- built form and urban design.
- traffic and parking impacts.
- noise and vibration impacts.
- developer contributions.

Each of these issues is discussed in the following sections of this report. Other issues were taken into consideration during the assessment of the application and are discussed at **Section 6.6**.

6.1 Heritage Impacts

Lot 1 DP 133606 of GBH is identified as an item of local heritage significance containing Item No. 181 Goulburn Base Hospital Central Building and former Pavilions, originally opened in October 1889. The Central Building and former Pavilions are also listed on the Department of Health's section 170 Register.

GBH is also located towards the western end of the Goulburn City Conservation Area and lies opposite to the east of Goulburn High School, which contains a locally listed heritage item, being an existing 1926 two storey Edwardian building fronting Goldsmith Street.

The proposed redevelopment of GBH seeks approval for the demolition of a number of buildings and structures of little to moderate heritage significance (shown outlined red in **Figure 12**). Items of exceptional heritage significance will be retained, including the main one and two storey central hospital pavilion, the two storey eastern and western pavilions, open area along the Goldsmith Street frontage, curved driveway and two mature trees in front of the central pavilion.

The proposal was supported by a Statement of Heritage Impact (SHI), updated with the Applicant's RtS, which concludes that GBH has traditionally evolved since its initial development in the 1880's and that the proposed new built form, car parking and landscape response will provide improvements to the Goldsmith Street setback and would have acceptable heritage impacts. Any potential impacts were considered to have been mitigated by the proposed retention of the front setback, formal landscape setting and retention of exceptional and highly significant elements of heritage built form, and it was recommended that the Applicant prepare an archival photographic recording of existing building and prepare an interpretation plan.

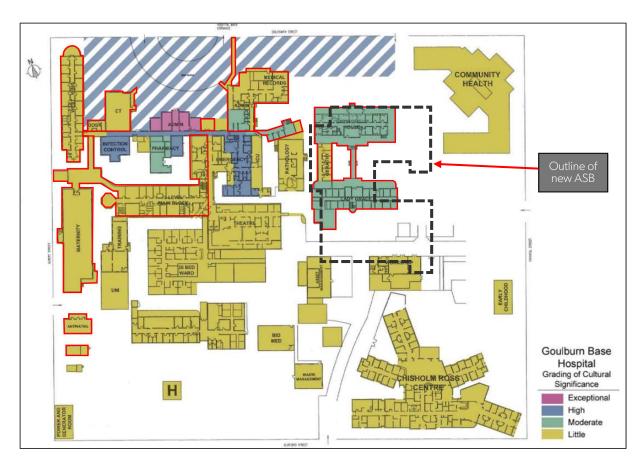


Figure 12 | Heritage Significance Grading and proposed building demolition (outlined red) (Base source: EIS/HIS, Perumal Murphy Alessi)

In its EIS submission, Council commented that the proposed removal of buildings graded as moderately heritage significant was considered acceptable in the context of enabling the ongoing and continuous use of the site for its original and intended purpose. However, it noted that the landscape scheme should be revised to provide an improved response to the traditional design and character of the heritage significant hospital precinct.

The Heritage Division requested additional justification for the demolition of the Specimen Collection/Pathology Collection building and Reception buildings and that the application be supplemented by the submission of a heritage interpretation plan and detailed historical archaeological assessment.

The Applicant responded in its RtS with a revised SHI that provided additional justification for the proposal and a Historical Archaeological Assessment (HAA) of the hospital site. The HAA concluded that the potential for archaeological items of significance being recovered was low to medium and would have limited research value and therefore did not meet the threshold of 'relics' within the meaning of the *Heritage Act 1977*.

The Applicant's revised SHI included a detailed Options Analysis in response to the Heritage Division's request for additional justification for the proposed demolition of the Specimen Collection/Pathology Collection and Reception buildings. It was concluded that the option to retain the buildings was not suitable as:

- the Reception building has been added to over successive periods, with large areas of the facades having been resumed into the building and altered to suit the evolving requirements of the hospital.
- retention of the Reception building would require intervention and reinstatement of external walls and details, windows and openings.

- the significance of the Specimen Collection/Pathology Collection building has been diminished by the construction of the much larger former Nurses' Home and Children's Ward addition.
- existing connections between the Specimen Collection/Pathology Collection building and Pathology are problematic and the existing narrow, confined nature of these connections and existing small rooms affect the current use and functionality and would impact on future ongoing uses.
- the existing changes and modifications to the existing buildings over time to ensure of their retention has occurred at the cost of reducing and obscuring original significant fabric and details without improving hospital operations.

It was concluded that the retention of the buildings would not meet the required spatial and functional requirements for a modern hospital and would continue to restrict the delivery of contemporary models of health care.

The Department accepts that the removal of the existing Specimen Collection/Pathology Collection and Reception buildings is necessary to allow for the proposed evolution of the outdated hospital campus. The existing buildings are graded as having little to moderate heritage significance and will allow for the retention of more significant heritage fabric. Further, the revitalisation of these existing building would not provide any improvements to the delivery of health care services.

More broadly, the removal of other non-contributory buildings and structures will enable the provision of an improved curtilage around the heritage significant main hospital building. The increased setbacks and new open space areas will allow for the delivery of a new formal landscape that will integrate the existing heritage significant curved driveway. The new landscape scheme will also improve the visual context of the main hospital building in the surrounding public domain.

The proposed revised façade design of the new ASB and proposed low scale, translucent linkages provide a contemporary contrast to the exception qualities of the adjoining historic main hospital building. New landscaping within the front setbacks and along the frontages of proposed new car parks will assist in softening the bulk of the proposed new built form and reinforce the curtilage and significance of the existing main hospital building.

The Department notes that Council raised no objections to the proposed demolition of existing building or the proposed design and siting of the new built form, noting that its heritage consultant concluded that the works had been designed with consideration of the existing heritage values and achieved the retention of the most important buildings.

The Department concludes that the demolition of existing buildings and proposed new built form is acceptable and will allow for the redevelopment of the site for the purpose of providing improved healthcare services and facilities for the betterment of the public. The proposal also represents the continued evolution and use of the site for the purpose of providing those healthcare services.

Conditions of consent are recommended requiring: the preparation of photographic archival recording; interpretation of early building elements proposed to be removed; retention and display of the existing stone plaque located at the base of the Specimen Collection/Pathology Collection building; and the preparation of a Conservation Management Plan for building designated to have exceptional, high or moderate heritage value prior to the commencement of use.

6.2 Built Form and Urban Design

The proposal, as modified in the Applicant's RtS, involves the demolition of several existing buildings and structures and the construction of a new four storey ASB, associated linkages to existing hospital buildings and the refurbishment of existing internal areas. The proposed ASB will have a maximum building height of 22.085 m and a total GFA of 12,072 sqm, inclusive of refurbishment areas.

The proposal also involves ancillary business identification signage, landscaping works predominantly focused in the northern half of the site, and the construction of a new engineering compound adjacent to the GBH Faithful Street frontage.

The Department considers the key built form and urban design issues relating to the proposal to be built form and scale and landscaping, which are addressed in further detail below.

6.2.1 Built form and scale

The proposed new ASB has been sited to the east of the existing main hospital buildings in place of the existing Springfield House and Lady Grouse House, currently housing Community Mental Health, which are proposed to be demolished as part of the proposal. The positioning of the new acute services in this location will take advantage of the existing acute clinical operations undertaken adjacent.

The overall design and scale of the proposal has been heavily informed by the requirement to provide improved efficiencies in circulation of patients, staff and visitors. The design will also see the consolidation of day to day operations and the removal of a number of outdated buildings and redundant structures to provide a more organised and improved outlook to the surrounding public domain.

Comments provided by the Government Architect NSW (GA) during the exhibition of the proposal requested further exploration of the internal entrance/circulation and waiting areas to improve amenity, and that the design and treatment of the façade of the new ASB and associated awning overhang required further design development. A public submission also noted that the design of the proposal should be more in keeping with the heritage style of the community, such as the predominant brick façades.

Council also noted the Applicant's reliance on clause 5.12 of GMLEP to support the building height exceedance was not applicable as this proposal is a new crown building and that a clause 4.6 variation request should be submitted by the Applicant.

In response to concerns raised during the exhibition of the proposal, the Applicant proposed a number of amendments to the design and form of new built form, the most significant of which included revisions to the building façade design and treatment to reduce the perceived bulk and scale of the proposal and to provide increased articulation in the façade and visual interest (see **Figures 13** and **14**). The Applicant proposes the following treatments to the façade design, including:

- use of alternating muted coloured compressed fibre cement panels.
- a modified window design that uses articulated metal anodised powder-coated window shading, primarily on the northern and eastern elevations.
- semi-enclosure of the fire stairs with anodised exterior louvers and perorated metal screens.
- amendments to the north-facing articulated awning, entry canopy and signage to define the separate functional elements and create a hierarchy of entry.
- integration of signage into the building façade.

- amendments to the Goldsmith Street east-west corridor connecting the new hospital to the main hospital buildings to a transparent glass link.
- cladding of the rooftop plant room in matt metal sheeting and louvers to reduce its visual province.



Figure 13 | Northern View (Base source: RtS/Peck Von Hartel)



Figure 14 | North Western View (Base source: RtS/Peck Von Hartel)

The Applicant's RtS also detailed that the internal layout of new built form and refurbished areas had been designed in consultation with the Southern NSW Local Health District, GBH staff and the Applicant's reference group to ensure the service needs and standards for a contemporary hospital were met.

The GA acknowledged the submitted changes provide improved visual interest in the façade and that the amenity of the entrances had been addressed. However, it reiterated its recommendation for further façade articulation through the use of recessed, projecting and textured façade elements. It also requested that three dimensional images be developed to better understand the revised entrance volumes and spatial qualities.

The Applicant responded in its Supplementary RtS that the design of the façade, internal layout and landscape scheme have all been subjected to a number of approval and review processes and the current design is the accepted outcome by the Applicant's Executive Reference Group, which includes recognised and experienced architectural panel members. It also noted that the scheme provides a cost effective, durable and easily maintained façade system, which is a key driver for large scale health and civic infrastructure projects. The Applicant also noted that the provision of three dimensional images were unnecessary at this late stage in the

design evolution and assessment of the proposal and that the revised design has addressed a set of organisational principles that aim to remove uncertainty and provide a clearly defined main entry at the ground level and emergency entry at the lower ground level.

The Department notes the Applicant has attempted to address the key concerns of Council, the Heritage Division and the GA in revising the proposal and refining the ASB façade and entry design. The Department is satisfied that the process undertaken by the Applicant will provide a good design outcome and acknowledges the design input provided by key stakeholder reference groups (i.e. SNSWLHD) and the project's heritage consultant in finalising the current proposal.

The modern design of the new ASB and associated transparent glass connection to the existing historic hospital buildings provides a strong and distinct contrast in design elements between the old and the new, while the use of a textured brick finish on the lower ground level façade of the new building reflects the masonry construction of existing buildings. The Department is satisfied the proposed façade design will provide a level of visual interest within the surrounding streetscape while not dominating the precinct and diminishing the significance of the existing heritage elements.

The proposed massing and scale of the proposal is also considered acceptable and has been designed to ensure it provides an appropriate contextual response that juxtaposes the adjoining heritage significance of the main hospital building. Overshadowing generated by the proposal falls predominantly across the site and adjoining streets and will not adversely impact on the solar access of any surrounding residential land uses.

The proposed new four storey built form will replace existing two to three storey buildings but does not excessively increase the scale of built form within the precinct such that it visually detracts from the character of the locality. GBH is also surrounded by existing civic and public land uses on its north western (Goulburn High School) and south western (Victoria Park) elevations, whereby the public have an expectation that at some point such civic buildings and precincts would be revitalised and improved for the public benefit.

In this regard, the siting of the proposal has minimised its impacts on the existing natural and built environment as practically as possible, with proposed new car parking areas flanking its north eastern and south eastern elevations providing sufficient setbacks from the surrounding public domain.

The Department also recommends a condition of consent requiring that any proposed cladding material meets the requirements on the National Construction Code in terms of fire resistance.

6.2.2 Landscaping and public domain

The Applicant amended the proposal as part of its RtS in response to initial concerns raised by the GA and Heritage Division that the landscape design did not respect the formality of the original hospital or provide sufficient planted area to reduce the visual impact of the new buildings and expansive paved parking areas.

The proposed revised landscaping scheme (see **Figure 15**) was amended to ensure the design provides an improved response to the existing heritage significance of GBH and consists of the following:

- new formal landscape elements to the northern open space in front of the heritage significant main hospital building including a formal lawn area with low edge planting along boundary.
- revised formal entry to GBH including new pedestrian paths and Goulburn Rose plantings to reinforce the curved driveway geometry.
- new avenue tree plantings along new Goldsmith Street pedestrian entry to screen the new car parking areas to the east and west and reinforce the hospital entry.

new trees and plantings to car park site frontages and islands to provide additional shading and screening.

The GA commented that the creation of a landscape buffer between the car park to the north would improve the spatial quality between the existing and new hospital buildings. However, the Applicant advised that direct connections between the drop-off area and the hospital entrance was essential, and therefore the avenue of trees along the new pedestrian entry was proposed to screen the upper and lower car parking areas when on approach into the hospital.

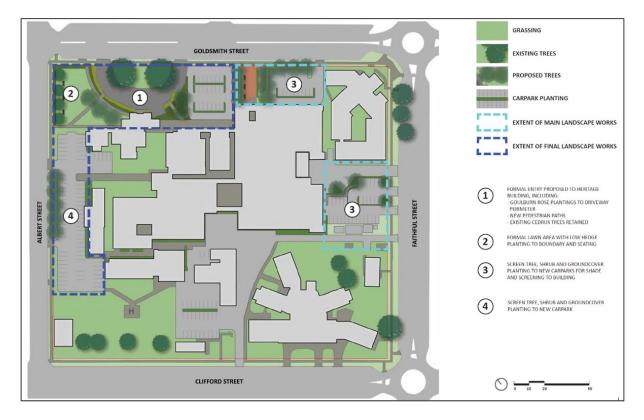


Figure 15 | Landscape Concept Plan (Source: RtS/Space Lab Architects)

Council also requested that additional shade trees be planted and that the existing Canary Island Date Palm (i.e. tree No.54 – located in one of the proposed new carparks adjacent to Goldsmith Street) be retained in situ, and that the car park layout be amended given the significant visual contribution the tree provides to the character of the hospital precinct.

The Department notes that tree No.54 is not proposed to be removed as part of this application and was approved for removal separately as part of the 2017 REF approved by NSW Health. It is understood that the Applicant is consulting directly with Council regarding the suitability of the tree's relocation to elsewhere on the hospital site.

The Department is satisfied that the revised landscape scheme for the proposal provides an appropriate response to the existing site and the scale and siting of the new built form. The landscape design is acceptable and supported as part of the redevelopment of GBH given the following:

- new screen planting along the car park frontages will assist in providing appropriate shade to users but also provide a green edge to the hospital that softens the bulk and scale of the proposal and visually screens the expanse of car parking hardstand areas.
- it will improve the visual amenity of the hospital and its relationship with the adjoining public domain.

• the design has had significant input from the heritage consultant to ensure a formal landscape scheme is provided that enhances the setting of the curtilage around the main hospital building.

The Department has recommended a condition of consent requiring the landscape concept design supported as part of this proposal to be formalised in detailed landscape plans prior to the commencement of landscaping works and to the satisfaction of the certifying authority.

6.3 Traffic and Parking Impacts

6.3.1 Car parking and access

GBH currently contains approximately 142 on-site car parking spaces, with the majority of these spaces restricted for use by staff and are typically occupied throughout the day. The site's street frontages accommodate approximately 226 car parking spaces, which is heavily relied on during the day to day operations of the hospital. Access to the hospital site is currently provided from all site frontages, with the main vehicle and pedestrian access provided on Goldsmith Street.

The proposal includes the reconfiguration and removal of old and construction of new on-site car parks in association with the proposed redevelopment of GBH. A total of 139 new car parking spaces will be constructed as part of the proposal, equating to an additional 54 new parking spaces to meet the demand generated by the proposal (see **Figure 16**) bringing the total on-site car parking provisions for GBH to 196 spaces.

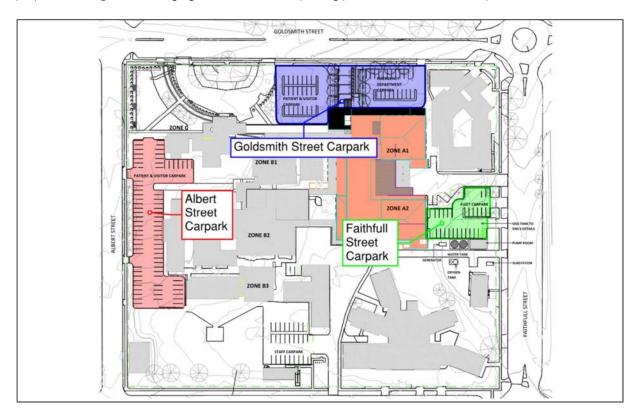


Figure 16 | New On-site Car Park Locations (Source: EIS)

The proposal will also accommodate provision of new drop-off and pick-up areas in the proposed car parks on Goldsmith Street and new bicycle parking provisions are also proposed for staff and visitors, with 12 and eight parking spaces proposed respectively.

Upgrades are also proposed to the vehicle and pedestrian entry points, with improved pedestrian access points provided from Goldsmith Street and Albert Street and new vehicle cross overs proposed as part of the new car parks on Faithful Street and Albert Street, including a separated emergency vehicle access point on Faithful Street.

Council and the public raised concerns regarding existing car parking issues generated by the hospital and the impact of the proposal on the availability of existing on-street car parking. Requests were made by both for consideration to be given to the construction of a multi-storey car park to address the hospital's parking demands.

The Department and TfNSW requested the Applicant provide further details to support and encourage sustainable/active travel modes to address on-going concerns regarding off-site car parking impacts, including the preparation and submission of a draft GTP.

The Applicant's Transport and Accessibility Assessment (TAA) outlines that the proposal would generate an additional parking demand of 53 spaces, based on a demand analysis and an additional 45 full time staff, 23 patient beds and 20 peak hour outpatients. The Department notes this demand is to be accommodated by the net provision of 54 new on-site car parking spaces as a consequence of the new and reconfigured car parks.

In an effort to address the residual car parking issues of the existing hospital, the Applicant submitted a draft GTP with its RtS. The GTP outlines that 12 per cent of existing staff walk to work, while only three per cent cycled to work. The remaining 85 per cent of staff drove to work, demonstrating a high portion of staff still rely on private vehicle usage (noting approximately 64 per cent of staff live within the same postcode as the hospital). To encourage an increased uptake in sustainable transport modes, a number of objectives have been proposed in the Applicant's draft GTP including:

- higher mode share of staff using existing public transport, and cycling and walking to work.
- ensuring adequate facilities are provided at the hospital campus to enable staff and visitors to commute by sustainable transport modes (e.g. bicycle racks, lockers and showers).
- reduce the number of car journeys associated with business travel.
- facilitate sustainable and safe travel for new employees.
- raise awareness of sustainable transport amongst staff and visitors.

A number of measures and monitoring mechanisms have been proposed to ensure these objectives are met, such as:

- annual travel survey of staff and visitors to understand travel behaviours.
- ensuring all new staff are briefed and made aware of the GTP and associated bicycle parking and end-of-trip facilities.
- monitoring of bicycle parking demand and staff cycling via quarterly occupancy surveys and annual travel survey, respectively.
- obtain feedback from staff regarding potential issues with certain walking routes to and from work and liaise with authorities regarding improvements (e.g. footpath maintenance, lighting and security).
- implementation of car-pooling initiative to take advantage of the high portion of workers who live within proximity to each other and the hospital.

The Applicant also supplemented its RtS with further details confirming that consultation was ongoing with Council regarding the implementation of on-street parking restrictions, specifically the potential introduction of timed parking, to address on-street parking pressures generated more broadly by the hospital and how those pressures can be better managed.

The Department notes that the calculated car parking demand generated by the proposal would be satisfactorily accommodated on-site within the new parking configuration provided as part of the site's redevelopment. The proposed new separated emergency vehicle access point on Faithful Street will also largely eliminate conflicts with private vehicles and improves accessibility and service to and from the hospital.

In the short term however, due to the staging of the proposed works, the ASB will be constructed and operational prior to the demolition of the remaining buildings on the campus. This will enable the uses currently accommodated within those buildings to be relocated into the ASB, thereby minimising operational impacts on the hospital from the proposed redevelopment. As a consequence, not all of the 139 new parking spaces will be immediately available when the ASB commences operation (i.e. Albert St carpark – 71 spaces and part of the Goldsmith St carpark – 21 spaces). The Applicant has detailed that it is expected that all works, including the construction of all car parking, will be finalised within seven months after the ASB opens. As detailed in **Section 6.3.3** of this report, a 120-space temporary carpark for construction workers is being provided by the Applicant for the duration of the construction works. Once the ASB is finished, the workforce is expected to drop to approximately 25 workers, meaning that 95 spaces will become available for the operational use of the hospital (predominantly staff parking). This is considered a satisfactory arrangement by the Department given its temporary nature and the short time frame between the opening of the ASB and the finalisation of all works.

The proposed sustainable travel initiatives proposed in the draft GTP are supported by the Department and it is noted that the successful implementation of these measures would assist in reducing reliance on the private vehicle use, with a five per cent reduction targeted by 2022. The targeted reduction would have a positive impact on reduced car parking demands, both on-site and in the surrounding streets.

To ensure the take up of sustainable travel modes is successful, the Department recommends a condition of consent requiring the draft GTP be finalised prior to the commencement of use of the new ASB. The final GTP must also include satisfactory details of the provision of appropriate existing or new end-of-trip facilities to support and encourage the use of sustainable travel modes, including showers and lockers.

The Department is satisfied that the implementation and ongoing review of the final GTP will ensure the ongoing shift in transport behaviour. In addition, the Department has also recognises that the Applicant is working in consultation with Council to implement on-street car parking restrictions, including the introduction of restricted parking in streets adjacent to GBH. Introduction of restricted parking measures will assist in managing on-street parking provisions and help deter hospital staff from parking within the immediate vicinity of the hospital.

6.3.2 Traffic impacts

The Applicant's TAA outlines the redevelopment of GBH would result in an additional 53 vehicle trips during peak times based on the additional staff, beds and outpatients. The proposal was also anticipated to generate an additional 10 daily pedestrian trips and two daily cyclist trips during peak times, which given the negligible increase were considered capable of being accommodated within their respective networks.

SIDRA intersection modelling outlined in the TAA indicates that the proposal would have an insignificant impact on the existing operational performance of surrounding intersections, with all key intersections continuing to operate at a Level of Service 'A' during peak times.

Council requested the Applicant provide further analysis of traffic generated by the operation of the proposal, however the Department considers this unnecessary given the existing operational performance of key intersections surrounding the site and the negligible impact the additional traffic movements generated by the proposed redevelopment of GBH would have on those intersections. The Department also notes that no objections were raised by the RMS during the exhibition of the proposal regarding the operational performance of the road network.

The Department is satisfied that the additional vehicle trips generated by the proposal can be satisfactorily accommodated by the existing network. The inclusion of proposed sustainable travel measures, as outlined above, will support sustainable transport modes that will further assist in minimising any potential impacts on existing networks.

6.3.3 Construction traffic and parking impacts

The Applicant's Preliminary Construction Traffic Management Plan (CTMP) outlines that the proposal is expected to be undertaken over three stages, consisting of enabling works, main works and final works. During these activities, existing at-grade hospital car parking will become unavailable, impacting on approximately 85 existing spaces, and reducing the total on-site parking provisions to approximately 57 spaces (see **Figure 17**). The reduction of on-site car parking will impact on the existing hospital parking demand of approximately 291 spaces.

The anticipated timeframe for the construction of the ASB is early 2019 to late 2020, where the average number of construction workers on site per day will be 120. The Applicant has detailed that the average workforce for final works following completion of the ASB (demolition of remaining buildings and construction of at-grade carparks) will be 25. It is expected that the lag period between completion of the ASB and the demolition and completion of all other works will be approximately seven months.

Construction vehicle access is proposed from Faithful Street during mains works and then from Albert Street for the final works to minimise potential disruptions to the ongoing operations of the hospital. A final CTMP is proposed to be prepared by the Applicant that will address the management and staging of works and associated access arrangements.

Concerns were raised by Council and the public regarding potential traffic and parking impacts during construction. The RMS also requested details of the proposal's staging to ensure enough parking is available throughout construction activities and details of temporary parking (if required).

Specific details of expected construction vehicle trips have not been provided, however the Applicant's CTMP details that construction vehicles would predominantly consist of light worker vehicles and heavy vehicles required for the periodic delivery and removal of large heavy materials, as well as concrete trucks.

The Department notes, however, given the existing high operational performance of intersections surrounding the GBH, construction traffic impacts generated by the proposal would be capable of being accommodated within the existing local road network. It will be essential for all construction related vehicles to only arrive at the site within the approved construction hours and not to use local residential streets surrounding the site for stabling prior to the commencement of daily construction activities. Accordingly, the Department recommends a condition of consent requiring all construction related vehicles arriving or leaving the site to do so within the approved construction hours.

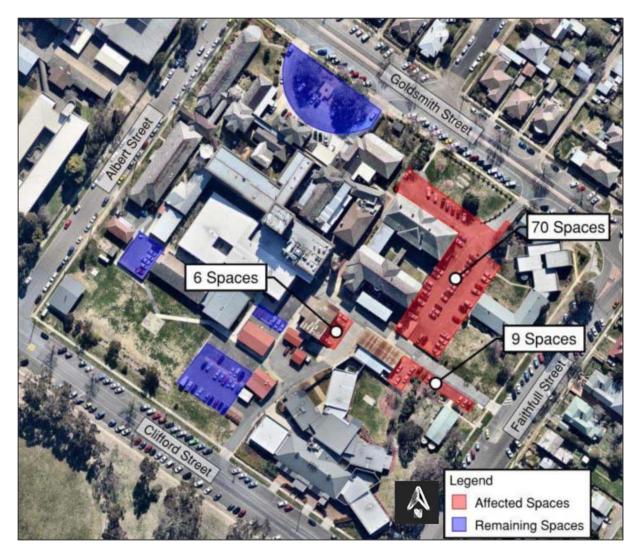


Figure 17 | Construction Impacted Parking Spaces (Source: EIS)

The Applicant's preliminary CMP outlined the opportunity for the establishment of a temporary car park for construction workers at vacant land on the nearby Wollondilly Public School. Further details provided by the Applicant in its supplementary RtS confirmed that the NSW Department of Education (DoE) had provided inprinciple agreement for the use of vacant land on the corner of Mount Street and Fitzroy Street at the public school (approximately 200 m northwest of GBH) for the establishment of construction worker parking (120 spaces). The Department also notes that discussions between the Applicant and Council have taken place regarding the installation of restricted parking areas (i.e. two and four hour limited street parking) in streets adjacent to the hospital to maximise parking for hospital users and visitors.

While short term in the context of the life of the proposal, the Department acknowledges the proposed construction activities will exacerbate existing parking issues. The Department supports the mitigation measures outlined in the Applicant's preliminary CMP, preliminary CTMP and Supplementary RtS, including the requirement for construction workers to park a minimum 400 m from the site and to car pool together.

Implementation of these measures will allow construction workers to take advantage of unrestricted parking within walking distance from the site without exhausting parking in closer proximity to the hospital for hospital users and visitors.

To ensure the construction parking impact concerns of Council and the public are satisfactorily addressed, the Department recommends conditions of consent requiring the Applicant to:

- enter into a formal agreement with DoE prior to the commencement of works for the establishment and use of a temporary car park on vacant land at the Wollondilly Public School (or suitable alternative location, as agreed to by the Planning Secretary) for temporary construction worker parking.
- prepare a final CMP, which includes details regarding the management and operation of the temporary car park, including its construction, operation and decommissioning.
- include details of any proposed augmentation to existing on-street car parking restrictions, including the introduction of restricted parking in streets adjacent to GBH.

Noting an estimated average daily workforce of 120 workers during the main works period and the implementation of the Applicant's proposed mitigation measure for construction worker car-pooling, the Department considers the provision of a temporary car park will alleviate significant on-street parking impacts associated with the redevelopment of GBH.

The provision of temporary construction parking will also assist in addressing residual demands generated by existing staff, hospital users and visitors, noting the proposed impacts to existing on-site car parking provisions during construction activities.

The Department is satisfied that the potential traffic impacts associated with the construction of the proposal are capable of being appropriately accommodated within the existing road network and will be satisfactorily managed through the implementation of a final CMP and CTMP and recommended conditions of consent. Construction parking impacts associated with the proposal, while not fully resolved, are capable of being satisfactorily offset through reasonable and feasible consultation with Council and the implementation of a temporary construction parking strategy.

The Department also recommends a condition of consent requiring a final CTMP be prepared prior to the commencement of construction to ensure that construction vehicle traffic and parking impacts are appropriately managed in a holistic manner.

6.4 Noise and Vibration Impacts

The proposal has the potential to cause adverse noise and vibration impacts on surrounding properties and existing hospital buildings during construction and operation as a result of construction activities and new operational plant and equipment. The proposal was supported by an Acoustic Report (AR) that assessed the potential construction and operational noise and vibration impacts on the nearest sensitive receivers.

Concerns were raised by the public during the exhibition of the proposal in relation to prolonged construction noise impacts. The Department also identified concerns with the Applicant's AR, including the background noise monitoring methodology undertaken.

The Applicant provided a revised AR with its RtS, which provided updated background noise monitoring and an update assessment against the EPA's Noise Policy for Industry (NPI).

Background noise monitoring was undertaken at the nearest residential receivers on Goldsmith Street and Faithful Street and the existing community health building (see **Figure 18**) to establish rating background levels (RBLs) (see **Table 7**) in accordance with the NPI.

The existing acoustic environment surrounding the proposal consists of existing medical and health uses on the GBH site (sensitive receivers L1 and L2), an educational establishment opposite to the northwest (Goulburn High School), low density residential dwellings opposite to the northeast (sensitive receiver L3) southeast (sensitive receiver L4) and existing recreational open space to the southwest.

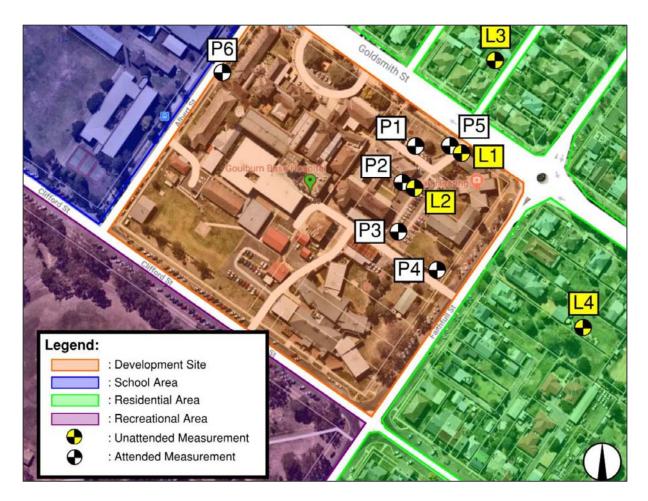


Figure 18 | Sensitve Receivers and Background Noise Monitoring Locations (Source: RtS)

Table 7 | Summary of Background Noise Levels

Location	Period	Measurement period Average; dB L _{Aeq, 15}	RBL, dB LA90, 15 mins
	Day	61	38
L3	Evening	41	32
	Night	43	30
	Day	51	40
L4	Evening	42	35
	Night	43	30

6.4.1 Construction impacts

The Interim Construction Noise Guideline (ICNG) establishes construction noise management levels for surrounding sensitive residential receivers and for surrounding non-residential sensitive land uses. Construction activities associated with the proposal that have the potential to impact on the surrounding sensitive receivers would include earthworks, above ground works, traffic, plant and machinery. The Applicant proposes the following construction hours:

- 7 am to 6 pm, Monday to Friday.
- 8 am to 1 pm, Saturdays.

The Applicant's AR states construction works would be undertaken while the hospital still operates and therefore would require the preparation of a detailed construction noise and vibration management plan prior to works commencing to address likely exceedances of the construction noise criteria for the project (i.e. RBL + 10 dB(A)).

The Department acknowledges that a detailed assessment of potential construction noise levels will be undertaken prior to construction and the selection of construction machinery and methods will determine the potential impacts. The consideration of this information is best placed as part of the final construction management plans prepared for the proposal. The Applicant's AR provides a list of considerations to help mitigate potential construction noise and vibration issues, including:

- use of noise management levels to better identify noise sources or scenarios that will require engineered controls or administrative management.
- promote clear understanding of ways to identify and minimise noise from construction works.
- application of all feasible and reasonable work practices to minimise construction noise impacts.
- flexibility in selection of site-specific and reasonable work practices to minimise noise impacts.
- ensure works to be undertaken within standard hours.
- use of noise reduction techniques including barriers, enclosures and silencers to ensure compliance with noise criteria.
- implementation of compliance maintenance regimes to ensure all equipment is operational.

To ensure potential construction impacts are appropriately managed, the Department recommends conditions of consent requiring the preparation of a detailed Construction and Noise Vibration Management Plan (CNVMP) that includes, but not limited to, the following information:

- an out-of-hours work protocol, including a detailed assessment of any works outside of standard construction hours, mitigation measures and notification/complaints arrangements as part of the required CNVMP.
- the exclusion of activities resulting in high-impact noise (including impulsive or tonal noise emissions) from the works outside of standard hours of construction.
- the requirement that all construction activities comply with best practice vibration management criteria to ensure no adverse impact to existing buildings or structures.
- the implementation of respite periods.
- the requirement for the installation and monitoring of noise monitoring at sensitive receiver locations, including alert triggers to stop works when sensitive receivers become 'highly noise affected' (i.e. noise levels exceed 75 dB(A) in accordance with the ICNG).
- the requirement to comply with the ICNG construction noise management levels (RBL + 10 dB(A) where feasible and reasonable.

Subject to the recommended conditions, the Department's assessment concludes the noise and vibration impacts generated during construction of the development can be appropriately managed and mitigated.

6.4.2 Operational impacts

The key sources of operational noise associated with the proposal include mechanical plant (e.g. cooling towers, air handler units, chillers, condenser units), back-up diesel generators, intermittent typical site operations, traffic noise and intermittent helicopter landing and take-off movements. Noise levels associated with the proposal will be required to meet the project noise trigger levels in the Applicant's AR, established in accordance with the NPI (see **Table 8**). The Applicant's AR also outlines specific detailed internal noise criteria for the ongoing operation of GBH to ensure satisfactory amenity levels are maintained.

Table 8 | Project Trigger Noise Levels

Location	Period	Intrusive Criteria L _{Aeq, 15 mins}	Amenity Criteria L _{Aeq, 15 mins}	Project Noise Trigger Level
	Day	43/45	58	43
L3/L4 (Residential)	Evening	37/40	48	37
(ricera ericial)	Night	35	43	35
School classroom (internal)	When in use	N/A	35	35

Predictive noise modelling of a potential typical worst-case scenario was calculated for the nearest sensitive residential receivers opposite the site in Goldsmith Street and Faithful Street. It was concluded that project trigger noise levels at the boundaries of these receivers could be complied with by ensuring acoustic barriers are installed to cooling towers and un-podded silencers are attached to the discharge fans of cooling towers.

The emergency generator is proposed to be located in the new Faithful Street hospital engineering compound and will be acoustically treated via acoustic shielding, provision of intake and discharge attenuations, residential grade acoustic silencer to the exhaust and internal absorptive lining to the plant room soffit. The implementation of these recommended measures was predicted to mitigate noise emission levels to below the project noise trigger levels and ensure compliance at the nearest sensitive residential receivers.

Noise emissions generated by car park operations were predicted to comply with the relevant project noise trigger levels at all surrounding sensitive receivers. It was also predicted that traffic noise emissions attributed to the proposed redevelopment of GBH would contribute less than 2 dB and was therefore expected to fully comply with the requirements of the NSW Road Noise Policy.

The Department is satisfied that the Applicant's AR has satisfactorily demonstrated that noise emissions associated with the proposal would, or are capable of being acoustically treated, to ensure they comply with the established project noise trigger levels. The proposed use of the building, including operation of the plant, is unlikely to generate adverse noise impacts. The Department has recommended conditions of consent for requiring:

- that all plant and equipment must be maintained and operated in a properly and efficiently.
- noise associated with plant, machinery or other equipment must not exceed the established project noise trigger levels.
- noise monitoring to verify that operational noise levels do not exceed the project noise trigger levels.
- the provision of noise attenuating measures should noise monitoring identify exceedance of project noise trigger levels.

Subject to compliance with the recommended conditions of consent and implementation of the proposed mitigation measures, the Department is satisfied that operational noise impacts can be appropriately managed.

6.5 Development Contributions

The proposal would normally attract a section 7.12 levy of one percent of the total cost of works in accordance with Goulburn Mulwaree Section 94A Development Contributions Plan 2009 (s.7.12 contributions plan), equating to approximately \$726,470, and is also subject to Council's Development Servicing Plan for Water Supply, Sewerage and Stormwater (section 64 developer contribution under the *Local Government Act 1993* and *Water Management Act 2000*).

6.5.1 Section 7.12 Development Contributions

The Applicant noted that the imposition of a development contribution was discretionary for the Minister for Planning, who may exempt the proposal from the payment of the one percent levy and it has requested a full exemption from the imposition of any consent requiring payment of a section 7.12 levy on the basis that:

- the proposal provides a distinct community benefit through the improved accessibility to contemporary health services that would result in significant material public benefit.
- levying one percent of the total cost of the proposal would divert significant public funds away from those allocated to improve services and facilities at GBH and impact on strategic objectives for the hospital's upgrades.
- Planning Circular D6 allows for development by the Crown to be exempt from section 7.11 contributions given the essential community services Crown activities provide.
- contributions should only be paid where a nexus is established for off-site works, such as drainage upgrade works and local road improvements, the likes of which are not generated by the proposal.
- the public nature of the proposal would not generate demand for public services and amenities in the same way that a typical commercial development would.

Council noted it supported the proposed GBH redevelopment, however, advised it did not support the Applicant's request for an exemption from making contribution payment due to the increased burden the proposal would place on existing infrastructure. Council did note, however, that it may consider exempting specific components of the development provided that the Applicant's request is reasonable.

Section 1.5 of Council's s.7.12 contributions plan provides guidance for where exemptions to the payment of a contribution levy may be appropriate. While the proposal does not necessarily align with these specified purposes, Section 1.5 also provides that Council may consider exempting other development on a case by case basis subject to a comprehensive submission arguing the case being made.

The Department has considered the Applicant's request for an exemption and notes Council's position that a complete exemption is not its preferred outcome and that the Applicant should contribute to the infrastructure burden generated by the proposal. The Department notes that a key purpose of Council's s.7.12 contributions plan is to assist it in providing appropriate public facilities that are required to maintain and enhance the amenity and service delivery within the LGA.

The proposal represents a significant financial investment by NSW Health within the SNSWLHD that aims to provide for upgraded and expanded healthcare services and hospital infrastructure that will have significant social and economic benefits for the immediate locality and surrounding region. The proposal will improve the standard and quality of healthcare services provided at GBH, which once complete, will offer a wide range of medical services, greater integration with existing community health services and provide greater capacity to meet the healthcare requirements of the growing and aging population.

The design of the proposal also seeks to address existing car parking infrastructure demands through the provision of an additional 54 car parking spaces so as not to worsen current off-site car parking conflicts. The design and layout of ancillary car parking and infrastructure would also result in improved accessibility to the hospital and minimise potential conflicts with emergency services vehicles by providing a dedicated access and service point within the site. The Department also notes that stormwater concept design for the proposal will provide a pre-development outcome and significantly improve water quality treatment of stormwater discharged from the site, which is currently untreated.

In view of the above, the Department is satisfied that the proposal meets the key purpose of Council's s.7.12 contributions plan and through the redevelopment of GBH will provide for new and enhance essential public facilities and that payment of a contributions is therefore not required under the circumstances.

6.5.2 Section 64 Development Servicing

Council commented in its EIS submission that a section 64 developer contribution charge of \$607,440.35 for water and sewer works would be generated by the proposal. The Applicant responded in its RtS that the assumptions made by Council in its calculation of the section 64 developer contributions were not correct and that the number of equivalent tenements (ETs) applied should only extend to new hospital beds (and not the proposed eight new oncology chairs). The Applicant suggested that a revised contribution amount of \$450,681.60 should be applied in line with new of ETs generated by the proposal.

Council advised in its submission on the Applicant's RtS that it accepted the revised water and sewer valuation and that the contribution amount be reduced to \$450,681.60.

The Applicant has subsequently advised its calculations of the proposal's demand on water and sewer services omitted the reduced demand due to the removal of the nurse's accommodation off-site, meaning that there would be no net increase in demand as a result of the proposal. It was therefore concluded that there was no basis for the Applicant to be charged section 64 developer contributions.

Council raised no objections to the Applicant's revised demand calculations for sewer and water and have confirmed that a contribution would not be required.

The Department is satisfied that the Applicant has demonstrated that the proposal would not have a net increase in demand on existing sewer and water servicing requirements for the site and that a section 64 developer contribution was not applicable in this instance.

6.6 Other Issues

The Department's consideration of other issues is provided at **Table 9**.

Table 9 | Department's assessment of other issues

Issue	Findings	Recommended Condition
Signage and wayfinding	 Council noted during the exhibition that the proposal appeared to include signage and should be considered against State Environmental Planning Policy No.64 – Advertising and Signage (SEPP 64). The Heritage Division noted that any signage should be limited and not detract from the heritage significance of the precinct. 	The Department has recommended a condition of consent requiring: • compliance with the approved wayfinding and signage proposed for the redevelopment.

- TfNSW recommended that wayfinding and a travel access guide be prepared for GBH that assists with increasing sustainable travel modes.
- The Applicant's RtS modified the proposal to include building identification signage, consisting of 10 pylon signs and 4 façade signs.
- A wayfinding strategy was also prepared and submitted with the RtS.
- The Department has considered the proposed business identification signage against the provision of SEPP 64 at Appendix C. The Department concludes that the proposed signage is acceptable.

Crime
Prevention
through
Environmental
Design
(CPTED)

- Council noted that all of the relevant CPTED principles had not been addressed, with specific reference to mitigating opportunities for crime and assault.
- Council further noted in its RtS comments that it would like the Applicant to demonstrate how wayfinding, lighting and safety when walking to cars at night has been considered.
- The Applicant responded in its RtS and Supplementary RtS that the principles of CPTED had been addressed in its EIS and includes a mitigation measure requiring wayfinding signage, lighting and CCTV are provided to ensure safety and security for all patients, visitors and staff.
- The Department is satisfied that the principles of CPTED have been considered and incorporated into the design of the proposal through:
 - o lighting, signage, CCTV security measures, and landscaping to clearly define and control access and territorial reinforcement.
 - use of low maintenance planting and building materials to minimise opportunities for antisocial behavior.
 - o the design of clear lines of sight between private and public spaces.
- The Department recommends that a condition of consent be imposed that requires all wayfinding signage, CCTV security measures and landscaping to be appropriately managed to ensure of their ongoing effectiveness.

The Department has recommended a condition of consent requiring the Applicant:

 develop an operational management plan for GBH that includes measures to ensure all wayfinding signage, CCTV security measures and landscaping is appropriately managed to ensure of their ongoing effectiveness.

Infrastructure services and stormwater

- WaterNSW advised during the exhibition that the proposal did not demonstrate if it would have a neutral or beneficial effect on water quality and insufficient detail was provided to assess the scheme's suitability. It also recommended a number of conditions of consent requiring:
 - o preparation of an operational environmental management plan.

The Department is satisfied that these matters have been addressed and do not require the imposition of any specific conditions of consent.

- o the sediment and erosion control plan be updated to a soil and water management plan.
- Council commented that augmentation of the existing sewer main in Faithful Street was required to be upgraded to 225mm in diameter.
- The Applicant responded in its RtS that the proposal would provide a beneficial effect on water quality by treating stormwater runoff from the site (on-site detention and bioretention), something that is not presently done.
- It also advised in its Supplementary RtS that upgrades to the existing Faithful Street sewer main were not required as the proposal would not place an increased demand on the existing system. This is due to previous works associated with the diversion of the Goulburn High School from within the GBH site to the upgrades lines in Albert and Clifford Streets and the reduced demand on the existing Faithful Street sewer main.
- The Department is satisfied that the proposal has incorporated measures to ensure that stormwater quality across the site is improved and that the services demand generated by the redevelopment of GBH can be satisfactorily accommodated within the existing network.

Subdivision

- The GBH campus currently comprises 11 separate allotments.
- Council recommended during the exhibition that the site should be consolidated to ensure compliance with the Building Code of Australia.
- The Applicant responded in its RtS, proposing the consolidation of the site and provided a plan of lot consolidation (see **Figure 12**).
- The Department supports the proposed consolidation of the site and has recommended an appropriate condition of consent.

The Department has recommended a condition of consent requiring consolidation of the site prior to the commencement of use of the proposal.



The Department has reviewed the EIS, RtS and assessed the merits of the proposal, taking into consideration advice from the public authorities, including Council, and all environmental issues associated with the proposal have been thoroughly addressed.

The proposal is consistent with the objects of the EP&A Act (including ecologically sustainable development) and is consistent with the State's strategic planning objectives for the site as set out in the South East and Tablelands Regional Plan 2036 as it would create jobs and provide for better access to healthcare services. The redevelopment of GBH will provide significant public benefit to the local and regional community through the provision of increased and improved health services for a major regional centre.

The proposal is suitable for the site and would not result in any significant adverse environment or amenity impacts and would be compatible with the scale and form of the surrounding development. The Department has also recommended conditions to manage the impacts in relation to potential construction and operational car parking impacts on the surrounding streets.

The proposal is considered to be in the public interest as it would provide public benefits, including:

- delivering modern health facilities that are able to support current standards for health care.
- consolidating and providing further investment in public infrastructure in a major strategic centre of the South East and Tablelands Region.
- providing additional health facilities to support the growing and ageing population in the region and associated increasing demand for public health services.
- delivery of up to 200 construction jobs and 45 new operational jobs.

The Department concludes the impacts of the proposal are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved subject to conditions.



It is recommended that the Executive Director, Priority Projects Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant consent to the application.
- agrees with the key reasons for approval listed in the notice of decision.
- grants consent for the application in respect of Goulburn Base Hospital Redevelopment (SSD 8667).
- signs the attached development consent and recommended conditions of consent (Appendix C).

Recommended by:

David Gibson

Team Leader

Social and Other Infrastructure Assessments

Recommended by:

Karen Harragon

Directo

Social and Other Infrastructure Assessments



The recommendation is: **Adopted by:**

David Gainsford

3/12/18

Executive Director

Priority Projects Assessments



Appendix A - List of Documents

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows.

- 1. Environmental Impact Statement http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8667
- 2. Submissions http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8667
- 3. Applicant's Response to Submissions http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8667

Appendix B - Statutory Considerations ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department's environmental assessment.

Controls considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State & Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)
- State Environmental Planning Policy No. 33 Hazardous and Offensive Development
- State Environmental Planning Policy No. 55 Remediation of Land (SEPP 55)
- State Environmental Planning Policy No. 64 Advertising Structures and Signage (SEPP 64)
- Draft State Environmental Planning Policy (Remediation of Land)
- Draft State Environmental Planning Policy (Environment)
- Goulburn Mulwaree Local Environmental Plan (GMLEP) 2009.

COMPLIANCE WITH CONTROLS

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

Table 1 | SRD SEPP compliance table

Relevar	nt Sections	Consideration and Comments	Complies
3 Aims	of Policy The aims of this Policy are as follows:	The proposal is identified as	Yes
(a) to identify development that is State significant development		SSD.	
8 Decl	aration of State significant development: section	The proposal is permissible	Yes
4.36		with development consent.	
	elopment is declared to be State significant pment for the purposes of the Act if:	The development is a type specified in Schedule 1.	
(a)	the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and		
(b)	the development is specified in Schedule 1 or 2.		
(Clause	ule 1 State significant development —general 8 (1)) spitals, medical centres and health research	The proposal comprises development for the purpose of a hospital and has a CIV in	Yes
facilitie	·	excess of \$30 million.	
	pment that has a capital investment value of more than llion for any of the following purposes:		
(a) (b)	hospitals, medical centres,		

health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).

State Environmental Planning Policy (Infrastructure) 2007

The Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

The Department has consulted and considered the comments from the relevant public authorities (refer to **Sections 5** and **6** of the report). The Department has included suitable conditions in the recommended conditions of consent (see **Appendix C**).

State Environmental Planning Policy No. 33 - Hazardous and Offensive Development

SEPP 33 provides clear definitions of hazardous and offensive industries and aims to facilitate development defined as such and to ensure that in determining developments of this nature, appropriate measures are employed to reduce the impact of the development and require advertisement of applications proposed to carry out such development.

A preliminary hazard analysis assessment is required if the development is identified as a potentially hazardous or potentially offensive development. The Applicant undertook a review of dangerous goods that would be handled or stored for the operations of the entire Goulburn Base Hospital (GBH) and provided a response in its Response to Submissions (RtS). The findings of the review revealed that GBH does not store or transport any dangerous goods or hazardous materials that would exceed the threshold quantities stipulated in SEPP 33. The Department is therefore satisfied that no further preliminary hazard analysis assessment is required.

State Environmental Planning Policy No. 55 - Remediation of Land

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application.

The EIS included a Preliminary Environmental Site Assessment report that was prepared based on a review of the site history, minor soil sampling and conceptual site model (CSM) to assist with the identification of potential contamination sources/areas of environmental concern. The CSM identified areas of environmental concern that included potential fill material, the site's historical agricultural use, use of pesticides and hazardous building materials.

The Preliminary Environmental Site Assessment did not identify any significant or widespread contamination on the site that triggered further detailed environmental assessment.

Notwithstanding these findings, further environmental investigations were undertaken by the Applicant and submitted with its RtS. The Additional Environmental Investigation report included a review of the findings of the original Preliminary Environmental Site Assessment and further soil sampling from 17 borehole locations and one test pit.

Results of additional soil sampling undertaken identified elevated concentrations of carcinogenic polycyclic aromatic hydrocarbons (PAHs) above the adopted Health Investigation Level, with the source of the contaminant likely to be associated with previously imported fill material rather than site activities which was noted as

decreasing in concentration with depth. Additionally, elevated levels of copper, arsenic, nickel and zinc were detected in several fill samples associated with previously imported fill material in garden bed areas and beneath car parking pavements.

The additional Environmental Assessment noted that the minimum soil sampling density for a detailed/stage 2 environmental site investigation was not met due to obstructions and access limitations across the site. Notwithstanding these limitations, it was concluded that remediation of the identified areas of environmental concern was required to ensure the site was made suitable for the intended land use and to minimise exposure pathways for future users of the site. It was also recommended that a validation assessment report be prepared following the completion of site remediation works.

A Remediation Action Plan (RAP) prepared and submitted with the Applicant's RtS in accordance with the recommendations made in the Applicant's Additional Environmental Assessment notes the identified areas of environmental concern will be appropriately managed during the proposed earthworks and landscaping works associated with the proposed site redevelopment. Impacted soils will either be removed from the site or will be integrated into landscaping areas and not pose a threat to future site users.

The RAP notes that the greatest contaminant of concern is associated with the presence of asbestos in soils that may be present in fill material encountered during site works. It was therefore recommended that further site specific testing be undertaken following demolition activities to better inform future remediation activities.

Proposed remediation will include a combination of offsite disposal and onsite encapsulation to appropriately manage identified contaminants of concern. Following the completion of site demolition and remediation activities, site validation is proposed to be undertaken to validate the suit's suitability for its ongoing hospital land use.

The Department notes that no objections were raised to the findings and recommendations of the Contamination Assessment. The Department is satisfied that the Applicant has adequately addressed clause 7 of SEPP 55 and that the site can be made suitable for its intended use.

The Department also recommends conditions requiring the preparation and implantation of an unexpected finds protocol to ensure measures are in place should any unanticipated contamination be found during works.

State Environmental Planning Policy No. 64 - Advertising and Signage

SEPP 64 applies to all signage that under an EPI can be displayed with or without development consent and is visible from any public place or public reserve.

Development consent is sought for four new façade signs and 10 new pylon signs. New building identification façade signage is proposed on the ASB's Goldsmith Street elevation, while new pylon wayfinding signage is proposed at new or reconfigured site access points (see **Figures 1** and **2** below).

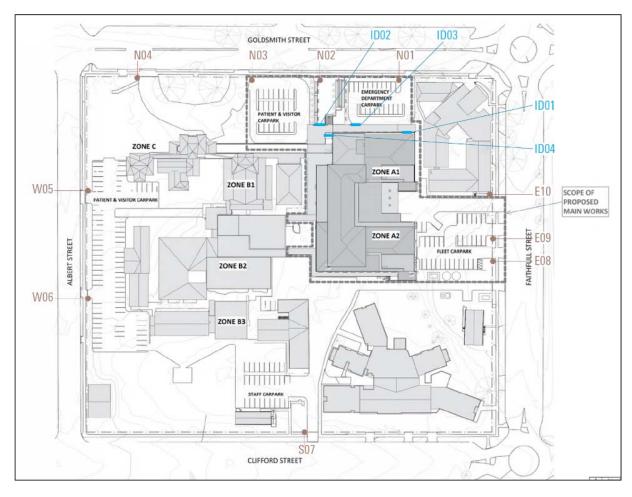


Figure 1 | Façade and Pylon Signage Locations (Source: RtS)

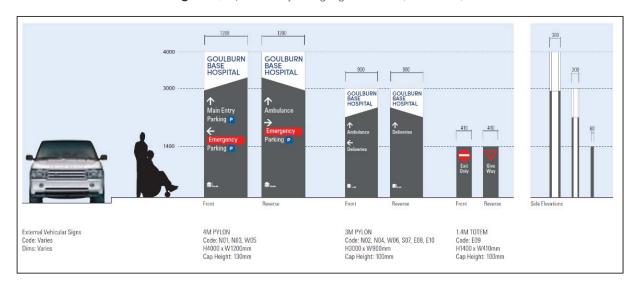


Figure 2 | Pylon Signage Designs (Source: RtS)

Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the proposal is consistent with the objectives of the SEPP and with the assessment criteria which are contained in Schedule 1. **Table 2** below demonstrates the consistency of the proposed signage with these assessment criteria.

Table 2 | SEPP 64 compliance table

Assessment Criteria	Comments	Compliance
1 Character of the area		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The proposed signage is contemporary in design but consistent with the existing and future hospital use of the site.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	Existing building identification and wayfinding signage is present throughout the GBH site. The proposed new signage is consistent with NSW Health's guideline, Wayfinding for Healthcare Facilities.	Yes
2 Special areas		
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?	While the site is location in a conservation and contains and existing items of local heritage significance, the proposed signage will not detract from the significance of these items or the visual quality of the locality.	Yes
	The proposed design and functionality of the proposed signage is in keeping with the primary hospital use of the site and will assist with wayfinding throughout the public facility.	
3 Views and vistas		
Does the proposal obscure or compromise important views?	No views or vistas will be impacted by the proposed signage.	N/A
Does the proposal dominate the skyline and reduce the quality of vistas?	No views or vistas will be impacted by the proposed signage.	N/A
Does the proposal respect the viewing rights of other advertisers?	Proposed signage will not impact on existing views experienced by others or existing advertising rights.	N/A

4 Streetscape, setting or landscape

Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The proposed scale and design of the signage is appropriate for the streetscape and hospital precinct setting within which it is proposed.	Yes
	Larger pylon signs (i.e. 4 m in height) are used in limited numbers, but at keep arrival points to ensure wayfinding through the site is maximised. Smaller pylon signs are proposed at secondary/staff access points, where higher levels of association with the site reduce the necessity for larger signage.	
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposed minimal design of signage will ensure it does not negatively impact on the heritage setting of the hospital precinct.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The proposal does not include advertising signage.	N/A
Does the proposal screen unsightliness?	Signage has been designed in keeping with the site's hospital use and NSW Health's guideline, Wayfinding for Healthcare Facilities.	Yes
	Signage is proposed in locations to minimise clutter and convey simple messages to assist with wayfinding through the hospital precinct.	
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	No signage is proposed above the main hospital buildings or existing vegetation.	Yes
Does the proposal require ongoing vegetation management?	No ongoing vegetation management will be required by the proposed signage.	N/A
5 Site and building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or	The proposed scale and design of the signage is compatible with the site, the proposed new ASB and NSW Health's	Yes

building, or both, on which the proposed signage is to be located?	guideline, Wayfinding for Healthcare Facilities.	
Does the proposal respect important features of the site or building, or both?	New façade signage is proposed on the Goldsmith elevation of the proposed new built form and will not detract from the heritage significance of the existing main hospital building. New pylon signage is located around the periphery of the site and satisfactorily setback such that it would not detract from the setting of the site or existing heritage significant built form.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The proposed signage has been designed in keeping with NSW Health's guideline, Wayfinding for Healthcare Facilities which aims to ensure the experience for patients, visitors and staff at NSW hospitals are enjoyable and not stressful.	Yes
6 Associated devices and logos with advertise	ments and advertising structures	
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?	Signage on the building's façade will be mounted to the façade and will not require safety devices or platforms.	Yes
7 Illumination		
Would illumination result in unacceptable glare?	Illumination is proposed to ensure the	Yes
Would illumination affect safety for pedestrians, vehicles or aircraft?	wayfinding functionality of the proposed signage is maintained throughout the 24/7 operational cycle of the hospital.	
	wayfinding functionality of the proposed signage is maintained throughout the 24/7 operational cycle	

Can the intensity of the illumination be adjusted, if
necessary?
Is the illumination subject to a curfew?

The proposed illumination of signage is Yes intended to occur at all times consistent with the 24/7 operation of the hospital.

Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?

The proposed design and location of signage is not anticipated to have an adverse impact on pedestrian or any public road.

Yes

Would the proposal reduce safety for any public road?

Draft State Environmental Planning Policy (Remediation of Land)

The Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP) will retain the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment.

Additionally, the provisions of the Draft Remediation SEPP will require all remediation work that is to carried out without development consent, to be reviewed and certified by a certified contaminated land consultant, categorise remediation work based on the scale, risk and complexity of the work and require environmental management plans relating to post-remediation management of sites or ongoing operation, maintenance and management of on-site remediation measures (such as a containment cell) to be provided to council.

The Department is satisfied that the proposal will be consistent with the objectives of the Draft Remediation SEPP.

Draft State Environmental Planning Policy (Environment) (Draft Environmental SEPP)

The Draft Environment SEPP is a consolidated SEPP which proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Willandra Lakes World Heritage Property. Once adopted, the Draft Environment SEPP will replace seven existing SEPPs. The proposed SEPP will provide a consistent level of environmental protection to that which is currently delivered under the existing SEPPs. Where existing provisions are outdated, no longer relevant or duplicated by other parts of the planning system, they will be repealed.

Given that the proposal is consistent with the provisions of the existing SEPPs that are applicable, the Department concludes that the proposed development will generally be consistent with the provisions of the Draft Environment SEPP.

Goulburn Mulwaree Local Environmental Plan (GMLEP) 2009

The GMLEP aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Goulburn Mulwaree LGA. The GMLEP also aims to conserve and protect natural resources and foster economic, environmental and social well-being.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the GMLEP and those matters raised by Council in its assessment of the development (refer to **Section 5**). The Department concludes the development is consistent with the relevant provisions of the GMLEP. Consideration of the relevant clauses of the GMLEP is provided in Table 3.

Table 3 | Consideration of the GMLEP

GMLEP	Department Comment/Assessment
Clause 2.7 Demolition requires development consent	The Applicant is seeking development consent for the demolition of existing buildings and structures from the site to facilitate the proposed redevelopment of GBH.
Clause 4.3 Height of buildings	A maximum height limit of 8 m applies to the GBH site. The proposal has a maximum building height of 22.085 m, exceeding he maximum permitted height by 14.085 m.
	Consideration of the proposed built form and its maximum building height and objectives of section 4.3 of GMLEP has been provided in Section 6 of the report. The Department concludes that the proposed maximum building height of the new ASB is satisfactory.
Clause 5.10 Heritage conservation	Lot 1 DP 133606 of GBH is identified as an item of local heritage significance that contains Item No. 181 Goulburn Base Hospital Central Building and former Pavilions. GBH is also located in the western end of the Goulburn City Conservation Area and lies immediately to the east of Goulburn High School (i.e. Item No. 182), which contains an existing 1926 two storey Edwardian building fronting Goldsmith Street.
	The Department has considered the impacts of the proposal in Section 6 of the report, with particular regard to the demolition of buildings around existing heritage items and impacts associated with the development of a new acute health services building adjacent. The proposed redevelopment of GBH will ensure that elements of high and exceptional heritage significance are retained and enhanced through the removal of non-contributory elements and the integration of more respectful built forms adjacent.
	The Department also acknowledges that the updated archaeological assessment provided with the Applicant's RtS confirms there is no evidence of substantial or significant intact items of significance.
	The Department concludes that the demolition of existing building is acceptable and will allow for the redevelopment of the site for the purpose of providing improved healthcare services and facilities for the betterment of the public. The proposal also represents the continued evolution and use of the site for the purpose of providing those healthcare services.
Clause 5.12 Infrastructure development and use of existing buildings of the Crown	The proposed maximum building height of the new ASB would exceed the maximum 8 m building height permitted by clause 4.3 of the GMLEP by 14.085 m. As noted above, the Department's assessment of the proposal concludes that the built form, and associated exceedance of the maximum building height, is satisfactory under the circumstances.

	Further, clause 5.12(1) of GMLEP provides that the carrying out of any development, by or on behalf of a public authority, that is permitted to be carried out with development consent, is not restricted by the GMLEP.
Clause 7.1 Flood planning	The site is not located within the flood planning area and the proposed development is located above the flood planning level.
Clause 7.1A Earthworks	Minor earthworks are proposed as part of the redevelopment of GBH to facilitate the establishment of a level building pad associated with the proposed lower ground level and to accommodate the proposed at-grade car parking areas.
	The proposed earthworks have been designed in conjunction with the overall site design and associated stormwater drainage works to ensure the proposal does not generate any adverse off-site environmental impacts.

Other Policies

In accordance with Clause 11 of the SRD SEPP, Development Control Plans (DCPs) do not apply to State significant development. Despite this provision, consideration of the relevant development controls contained within Goulburn Mulwaree Development Control Plan 2009 (GMDCP) is provided in **Table 4**.

Table 4 | Goulburn Mulwaree DCP compliance table

GMDCP	Department Comment/ Assessment
Section 3.1 European	n heritage conservation
3.1.3.6 Development applications including demolition	Development consent is sought for the demolition of existing buildings and structures identified as having little to moderate heritage significance. Building elements identified as having high and exceptional heritage significance are proposed to be retained and enhanced through the removal of non-contributory elements and the integration of more respectful built forms adjacent.
	The Department is satisfied that the Applicant has demonstrated retention of the buildings proposed for demolition is not possible without impacting on the delivery and improvement of healthcare services provided at GBH.
3.1.3.8 Contributory heritage	The main Central Hospital Building and former Pavilions, graded as having high and exceptional heritage significance, will be retained as part of the proposal. These contributory building elements and their setting within the hospital precinct are proposed to be enhanced through the removal of non-contributory elements and improvements to the landscape setback to Goldsmith Street.
3.1.3.11 Infill development	The proposed new acute health services building, and associated refurbishment and connecting/linkage works have been designed to ensure they do not detract from the high and exceptional heritage significance of the adjoining Central Hospital Building and former Pavilions.

The bulk and scale and facade design of the proposal has been refined in the Applicant's RtS to provide a more neutral and respectful built form and finish that better integrates within the conservation area.

3.1.3.13 Materials and finishes

The proposed materials and finishes were refined in the Applicant's RtS to more neutral and matte finishes. The refinements to the acute health services building façade are more in keeping with the colours and character of the adjoining heritage significant buildings.

Section 3.3 Landscaping

3.3.4 Streetscape (Unban)

New landscaping, including tree planting, is proposed along the site's frontages to assist with softening the proposed building bulk and expanse of car parking hardstand areas.

A new formal landscape in front of the existing heritage significant Central Hospital Building is proposed that enhances the significance of the existing curved driveway.

3.3.6 Set backs

All setbacks are proposed to be landscaped where new works are proposed.

Section 3.4 Vehicular access and parking

3.4.2 Specific land use requirements

In accordance with GMDCP, a Transport and Accessibility Statement has been prepared, supplemented in the Applicant's RtS, detailing that the proposal generates an additional parking demand for 53 cars.

Up to 85 existing car parking spaces are proposed to be impacted by new building works and will be supplemented by the provision of 139 space through the construction of new and reconfigured/ expanded existing on-site car parks, providing an additional 54 car parking spaces.

Section 3.5 Crime prevention through environmental design

The Applicant advises that the proposal has been subjected to review by various governing bodies to ensure safety and potential risks are reviewed throughout the detailed design phases.

The Applicant also advises that the principles of Crime Prevention through Environmental Design (CPTED) have been incorporated into the design of the proposal, as follows:

- integration of active frontages and spaces are key building entrances to ensure natural surveillance within the public domain.
- provision of direct lines of sight between public and private spaces.
- activation of the immediate locality through the 24-hour, seven days a week operational characteristic of the hospital precinct that will increase levels of casual surveillance within the immediate locality.
- existing CCTV network will be reviewed through the detailed design development phases to ensure adequate levels of security are provided.
- establishment of clearly defined access points and entrances that promote territorial reinforcement to minimise the risk or and deter any criminal activity.
- application of existing GBH management measures are applied to new development works to ensure areas that are rundown, dilapidated or subjected to vandalism and graffiti are repaired quickly.

Section 7.3 Drainage and soil and water management

7.3.1 Drainage (urban)

The SSD application was accompanied by a Civil and Structural Report that presents the proposed stormwater management approach for the site, which includes the provision of on-site detention and bio-retention water quality treatment. The design of the stormwater system proposes to match pre-development flows with post-development flows and to minimise impacts on downstream properties during peak events.

Stormwater runoff from new impervious areas and new car parking areas is proposed to be treated by bio-retention and by directing runoff to landscape areas to reduce pollutant generation and to improve the quality of stormwater leaving the site than is currently discharged.

7.3.3 Soil and water management

The proposal incorporates a Soil and Erosion Sediment Control Plan to ensure that construction activities associated with the proposal do not result in any adverse offsite impacts.

Appendix C - Recommended Instrument of Consent