



SSDA
SECTION 4.55(1a)
APPLICATION
PLANNING REPORT

SSD 17_8667
GOULBURN BASE HOSPITAL
130 Goldsmith St, Goulburn

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EXECUTIVE SUMMARY

LJB Urban Planning Pty Ltd has been commissioned by Health Infrastructure to prepare a Modification Application in support of the following works within the Goulburn Base Hospital, as follows:

- Retention of the Ward Block, which was previously approved for demolition under SSD 17_8667.

It was determined that the retention of the above building was more cost effective and could be upgraded without significant financial costs.

The retention of the building will not affect the wider hospital redevelopment, which is currently under construction in conjunction with the State Government and will continue to achieve the strategic direction of the following strategic planning documents:

- East Tablelands Regional Plan 2036; and
- Goulburn Mulwarre Employment Land Strategy.

The Environmental Impact Statement (EIS), prepared by City Plan Strategy & Development P/L, dated March 2018, that accompanied the original SSD application (SSD 17_8667) outlined the following objectives for the original proposal: *Cater for future service demand created by the Region's ageing population and increased incidence of chronic disease;*

- *Improve the efficiency and effectiveness of service delivery through better patient flows, integrated care and model of care and elimination of service and duplication;*
- *Provide asset replacement capable of enhancing functionality and capacity;*
- *Remedy the sub-standard facility environments;*
- *Develop a facility to enable staff/clinicians to implement contemporary models of care to better meet the needs of the community; and*
- *Attract and retain a skilled and sustainable workforce at GoBH.*

The modification of the SSDA to retain the Ward Block (Building H and M) will continue to satisfy the objectives of the approval, as it will enable the future upgrade of an already constructed facility that will improve services for staff and patients.

Ward Block is positioned in close proximity to the following heritage listed items:

- Central Building; and
- Original 1887 Pavilions.

Ward Block is positioned to the side and behind these buildings, to the centre of the site. As such, retention will have no detrimental impact, as determined in the report below.

There is no anticipated increase in staff that would require any additional parking and no greater strain on the surrounding traffic network. There is a potential increase in staff likely over the weekend and in the evenings because of the works to the Central Services Building but not the retention of Ward Block.

Therefore, the retention of Ward Block will have no impact on the demand for carparking or peak traffic movement.

Overall, the retention of the building will be substantially the same development and is an appropriate modification that will be financially viable and will support the wider community, with increased health facilities.

The approved Acute Services building is nearing completion and will require the issue of an occupancy certificate, as the Ward Block is now being retained the SSDA requires modification, to allow for this process to occur.

The proposed modification is reasonable for reasons discussed in the report below and should be supported.

1.0 INTRODUCTION

- 1.1 This report has been prepared for Health Infrastructure (HI) by LJB Urban Planning Pty Ltd to support an application under Section 4.55(1A) of the Environmental Planning and Assessment Act 1979.
- 1.2 The subject site is legally described as follows:
 - Lot 100 DP 1257296
- 1.3 The site is located about 700m northwest of the Goulburn Central Business District and 3.8km northeast of the Hume Highway interchange, shown in **Figure 1** below.



Figure 1: Locality Map (Source: Nearmap)

- 1.4 The site has a primary frontage to Goldsmith Street of 210.69m, secondary frontages of 186.56m to Albert Street, 183.45m to Faithful Street and 210.30m to Clifford Street. Refer to **Figure 2**, below.



Figure 2: Subject site – Ward Block Highlighted by Yellow Outline (Source: Nearmap)

- 1.5 The site is zoned SP2 Infrastructure under Goulburn Mulwaree Local Environmental Plan. The land is within a heritage conservation area under Clause 5.10 of Goulburn Mulwaree Local Environmental Plan 2009. The land is within Goulburn City Conservation Area and contains locally listed heritage item No. 181, being the Central Building and former pavilions. The identified heritage item is also listed on the Department of Health's section 170 Register (Heritage Act 1977).
- 1.6 The site is currently occupied by Goulburn Base Hospital. Construction works under the current approval are underway. This application seeks to modify the previously approved State Significant Development application SSD 17_8667.
- 1.7 SSD 17_8667 was approved by the former NSW Department of Planning and Environment, now known as the NSW Department of Planning and Environment (DPE) on 3 December 2018. The consent granted approval for:
 - Site preparation works including demolition of existing buildings and structures and site remediation works.
 - Construction of a new four storey Acute Services Building and internal refurbishment works to existing hospital buildings with a total gross floor area of 12,072m²
 - Construction of a new Engineering Compound and new emergency vehicle bay off Faithful Street.
 - Augmentation to existing vehicle access arrangements and construction of new car parking areas accommodating a net increase of 54 car parking spaces.

- Landscaping and public domain works, including construction of a new formal landscaped lawn area at the northern end of Goldsmith and Albert Streets and screen planting to car park site frontages.
 - Installation of business identification signage including 10 pylon signs and four building façade signs.
 - Ancillary infrastructure and services works.
 - Lot consolidation.
- 1.8 Two modification applications have been submitted to DPE to amend SSD 17_8667 to date. The first modification was withdrawn. The second modification was approved on 28 January 2020. The approved modifications included the following:
- Internal and external design changes to the approved building
 - Changes to loading dock, ambulance entry, access and parking layout
 - Retention of Building 32 (previously approved for demolition and internal refurbishment)
 - Changes to the approved signage
 - Alterations to the approved landscaping
 - Inclusion of a staging plan
- 1.9 This modification seeks to modify SSD 17_8667 by the retention of Ward Block, Building H & M that were previously approved to be demolished. Amended demolition plans are attached at **Appendix 1**.
- 1.10 Under the original approval, the demolition of buildings across the site were justified for the following reasons:
- Demolition of ageing assets; and
 - Improving curtilage and legibility of important heritage buildings on the site.
- 1.11 The retention of the building will not result in the loss of any of the proposed new buildings or services, as there were no approved replacement buildings in lieu of the demolished buildings. It has been determined that the building retention is a viable option.
- 1.12 In addition, the retention of the Ward Block will not affect the curtilage around the listed heritage items, as the building is positioned to the side and rear of these items. The setback between Goldsmith Street and the listed heritage items will still see buildings demolished and result in improved curtilage when viewed from the public domain.
- 1.13 Retaining the building will allow for the continued use of assets on site. Given the position and condition of the building, its retention is more appropriate under the circumstances.
- 1.14 This report provides information on the subject site, the proposed development and undertakes an assessment against the relevant heads of consideration set out in the Environmental Planning and Assessment Act 1979.
- 1.15 The amended development is considered to be substantially the same development, and this will be further addressed in Section 3 of this report, below.

2.0 STRATEGIC CONTEXT

- 2.1 The Environmental Impact Statement (EIS), prepared by City Plan Strategy & Development P/L, dated March 2018, that accompanied the original SSD application (SSD 17_8667) outlined the following objectives for the original proposal:
- *Cater for future service demand created by the Region's ageing population and increased incidence of chronic disease;*
 - *Improve the efficiency and effectiveness of service delivery through better patient flows, integrated care and model of care and elimination of service and duplication;*
 - *Provide asset replacement capable of enhancing functionality and capacity;*
 - *Remedy the sub-standard facility environments;*
 - *Develop a facility to enable staff/clinicians to implement contemporary models of care to better meet the needs of the community; and*
 - *Attract and retain a skilled and sustainable workforce at GoBH.*
- 2.2 Overall, the proposed development was necessary to provide significant social benefits for the local community by providing for an improved hospital that would provide much needed services and facilities for the wider community.
- 2.3 This application seeks to modify SSD 17_8667 by the retention of Ward Block, Building H & M, that were previously approved to be demolished.
- 2.4 The strategic intent, for the upgrade and expansion of the wider hospital site remains as approved. The retention of these buildings will not alter the strategic redevelopment of the site, as no buildings were proposed in position of these buildings.
- 2.5 The retention of the building will still ensure that the heritage listed buildings will still continue to have improved curtilage, as the retained buildings are positioned behind and further to the south of the heritage listed buildings, when viewed from Goldsmith Street.
- 2.6 In addition, further assessment of Ward Block has determined that the building is worthy of retention and is a suitable building to house various staff with minimal alterations necessary. The minor works that would be required primarily relate to cosmetic changes that are considered exempt development under the provisions of State Environmental Planning Policy (Infrastructure) 2007.
- 2.7 The following strategic plans were taken into consideration during the assessment of the original SSD:
- South East Tablelands Regional Plan 2036; and
 - Goulburn Mulwarre Employment Land Strategy.

The proposed modification in relation to the above strategies are considered separately below.

South East and Tablelands Regional Plan

- 2.8 This strategy has not altered direction following approval of the SSD application. It continues to seek:

A borderless region in Australia's most geographically diverse natural environment with the nation's capital at its heart.

- 2.9 The strategy continues to identify Goulburn as one of the six strategic centres in the South East Tablelands Region, as shown in **Figure 3** below:

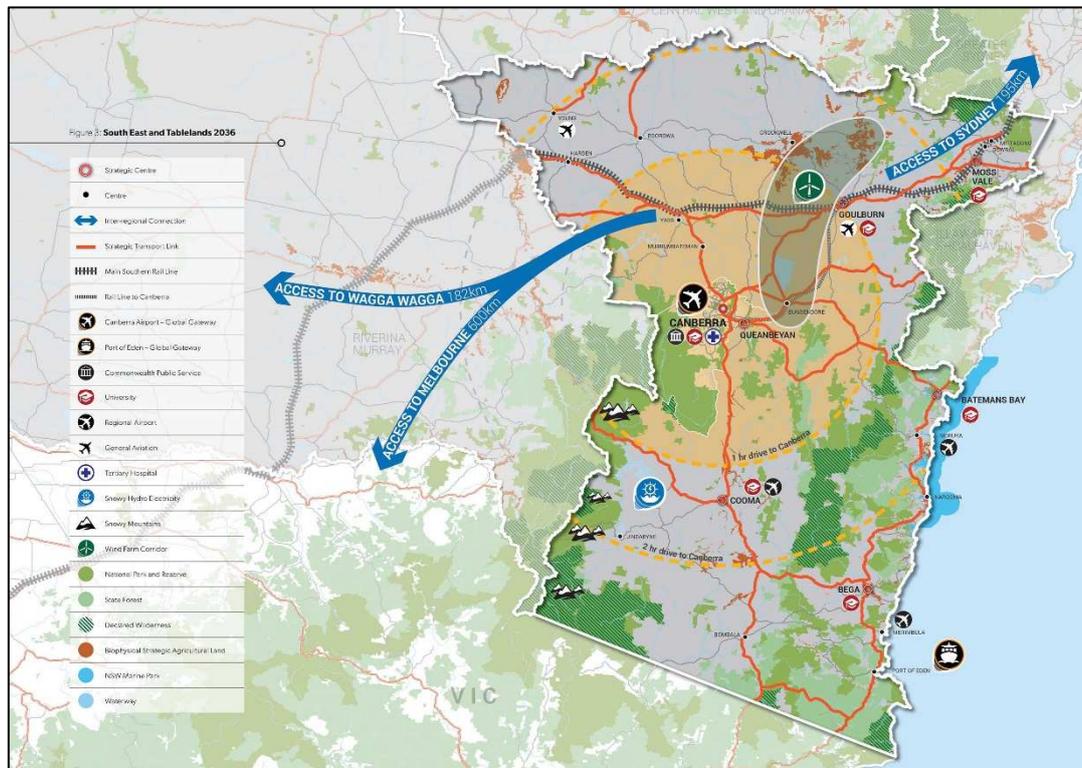


Figure 3: South East Tablelands 2036 Plan (Source: South East and Tablelands Regional Plan 2036 prepared by Department of Planning and Environment)

- 2.10 The SETRP goals remain unchanged and are listed below:

- 1) *A connected and prosperous economy;*
- 2) *A diverse environment interconnected by biodiversity corridors;*
- 3) *Healthy and connected communities ; and*
- 4) *Environmentally sustainable housing choices*

- 2.11 The proposed retention of the buildings will not alter the NSW Government's commitment, within this regional plan, to the redevelopment of the Goulburn Hospital. The new buildings approved will be constructed and the retention of this building will better service the community, improved health facilities and provide for increased employment opportunities.

- 2.12 The proposed development and environmental impacts are discussed in detail below. Overall, the proposed modification, to retain the ward block, will not detrimentally affect the strategic vision for the hospital and will enhance services and facilities within the site.
- 2.13 The proposed retention of the Ward Block will be a positive contribution and will assist in meeting the strategic vision for this regional area and continue to satisfy the strategic context for the locality.

Goulburn Mulwarre Employment Land Strategy

- 2.14 The GMELS is a strategic plan for employment lands in the LGA that will guide future decision making between key stakeholders. The strategy continues to recognise that “health care and social assistance” accounts for one of the top three sectors of the employment population.
- 2.15 The strategy continues to outline the State Government’s \$120 million dollar commitment to the redevelopment of the Goulburn Base Hospital for the following works:
- *new emergency department;*
 - *intensive care unit and theatres;*
 - *inpatient services; and*
 - *a comprehensive ambulatory care service.*
- 2.16 The retention of this building will not affect the provision of the above works, which have previously been approved and are under construction.
- 2.17 Based on the above, the proposed modifications will continue to achieve the strategic vision for the Goulburn area.

3.0 PROPOSED MODIFICATIONS

- 3.1 This modification seeks to modify SSD 17_8667 to enable the retention of Ward Block, known as Building H and M, that were previously approved to be demolished under the SSD approval.
- 3.2 Ward Block is a three storey building, that is located centrally within the Goulburn Base Hospital Site as shown in the **Figure 4** below:

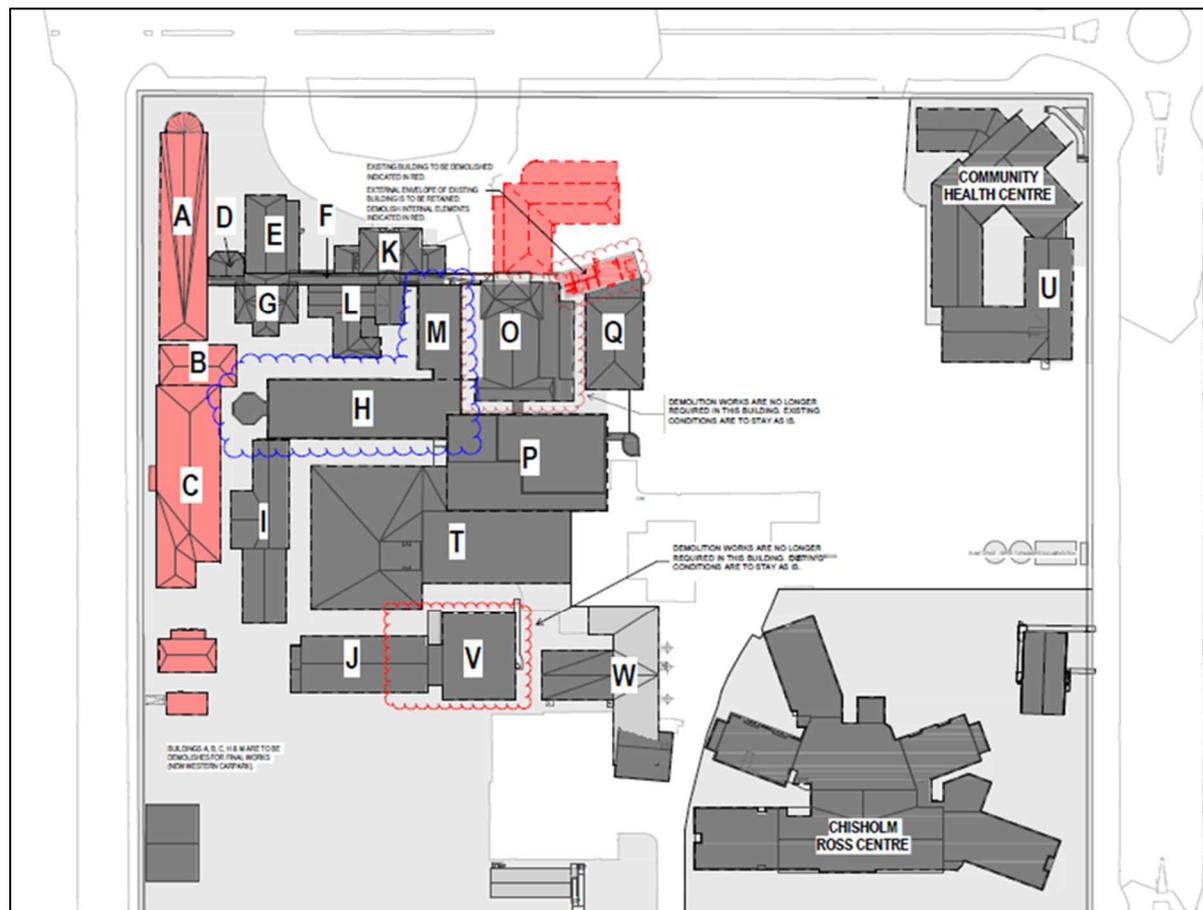


Figure 4: Blue cloud highlights Ward Block (Building H and M). This building is proposed to be retained rather than demolished (Source: Health Infrastructure).

- 3.3 The SSD 17_8667 approval did not include any additions or new building works, in the area where Buildings H and M are located, following their demolition. The area was to be landscaped.
- 3.4 Ward Block is a three storey building; it has a footprint of approximately 762m² and a total Gross Floor Area (GFA) of 2115m².
- 3.5 The building will be retained and used for the following hospital uses:
- Health Information Services – Level 2
 - Central Workspace – Level 1
 - Ambulatory and Outpatient Services – Ground Floor

- 3.6 **Table 1** below provides a comparison between the previously approved SSD and this modification:

Table 1: Modified Project Summary

Element	Original Project	Approved Modified Project	Modified Project
Project Area			
Site Area	3.87 hectares	No change	No change
Physical Layout and Design			
Building Height	21.96m	21.96m	21.96m
Site Access	Main vehicular entry from Goldsmith Street with separate car park access from Albert Street, Faithfull Street and Clifford Street.	No change.	No change.
Parking Spaces	196	197	No change.
Uses and Activities			
Land Use	Hospital	Hospital	Hospital
Staging of Construction	Not staged.	Approved to be staged, subject to preparation of a staging report to be approved by the Planning Secretary.	No change.

- 3.7 Essentially, the overall development is generally the same as approved, as demonstrated in the above table.
- 3.8 The retention of the Ward Block will result in a 3-storey building being retained that has a building footprint of approximately 762m² and a total GFA of 2,115m².

Justification for proposed modification

- 3.9 It has been determined that the building is viable and worthy of retention and is a suitable building to house various staff with minimal alterations necessary. The minor works that would be required primarily relate to cosmetic changes that are considered exempt development under the provisions of State Environmental Planning Policy (Infrastructure) 2007.
- 3.10 In order for the significant works at the site to be completed, in particular the construction of the new Sub Acute Building, the SSD approval requires modification to allow for the retention of Ward Block. As the current SSD approval requires its demolition, if the approval was not modified, this would impact on the issuing of a final Occupation Certificate.
- 3.11 The retention of the Ward Block accommodation is a transfer of existing services within the hospital, but with the inclusion of Health Information Services, ANU teaching clinic rooms and a new Comms room. The increased GFA need has arisen from floor loading constraints for storage as the Health Information Service has not transitioned to electronic file storage. In addition, there is inefficiency in the current layout, new comms room requirements and COVID area requirements.

- 3.12 This modification does not propose the provision of additional car parking. A strategy for the provision of parking across the site titled 'Transport and Accessibility Assessment' prepared by TTW was approved under the SSD approval. The assessment was undertaken on the basis of the new Acute Services building and determined that there was sufficient parking to accommodate the intensification of the site. As approved, there are a total of 197 spaces being provided.
- 3.13 A further Traffic Impact Assessment has been prepared by Stantec, refer to **Appendix 2**. The report confirms that the retention of Ward Block is not expected to result in any increase in parking demand or traffic generation to that estimated and assessed as part of the Transport and Accessibility Assessment prepared by TTW, that accompanied the approved SSDA. The report concludes that the retention of the Ward Block can be supported from a parking and traffic perspective, with no discernible operational changes in this regard.
- 3.14 Under the original approval, the demolition of buildings across the site were justified for the following reasons:
- Demolition of ageing assets; and
 - Improving curtilage and legibility of important heritage buildings on the site.
- 3.15 The retention of the building will not result in the loss of any of the new approved building and services, as there were no approved replacement buildings in lieu of the demolished buildings.
- 3.16 In addition, the retention of the Ward Block will not affect the curtilage around the listed heritage items, as the building is positioned to the side and rear of these items. The setback between Goldsmith Street and the listed heritage items will still see buildings demolished and result in improved curtilage when viewed from the public domain.
- 3.17 Retaining the building will allow for the continued use of assets on site and be a better resolution rather than demolition. The other alternative is to demolish and would be determined detrimental to the hospital or surrounding community. Retention is more appropriate under the circumstances.
- 3.18 As discussed above, the SSDA needs to be modified to retain the Ward Block as it affects the issuing of an Occupancy Certificate for the Acute Services Building, that is nearing completion.

Consideration of Section 4.55 Applications

- 3.19 This Section 4.55(1A) application is not subject to the complying, prohibited, designated, or advertised development provisions of the Act. There are no issues relating to endangered flora or fauna, watercourses or bush fire.
- 3.20 The application is submitted pursuant to the provisions of Section 4.55(1A) of the Act which states:

(1A) Modifications involving minimal environmental impact

A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:

- (a) *it is satisfied that the proposed modification is of minimal environmental impact, and*

- (b) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and*
 - (c) *it has notified the application in accordance with:*
 - (i) *the regulations, if the regulations so require, or*
 - (ii) *a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and*
 - (d) *it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.*
- Subsections (1), (2) and (5) do not apply to such a modification.*

3.21 An assessment of the requirements of Section 4.55(1A) is contained in the following section.

3.22 The Environmental Planning and Assessment Act 1979, requires the assessment of development proposals against the relevant 'heads of consideration' set out in Section 4.15 and the requirements of 4.55(8) of the EPA Act. These are addressed below.

Requirements of Section 4.55(1A)

3.23 The proposed amendments are considered to satisfy the test for a section 4.55(1A) application for the following reasons:

Substantially the same development

3.24 Whether a development is substantially the same development is a question of fact. This involves a qualitative and quantitative analysis. The analysis involves a comparison between the development as modified and the development originally approved. In the case of *Scrap Realty v Botany Bay City Council* [2008] the Chief Judge described the exercise as being:

3.25 *"The power of a consent authority to modify a consent is a power to alter without radical transformation of a consent"*

3.26 The development as modified must still retain the essence of the original approval. The modification seeks to retain Ward Block that was approved to be demolished. The retention of this building does not transform the consent. The main purpose of the consent was for the construction of a new four storey Acute Services Building and associated works. This core purpose and essence of the original approval does not change.

3.27 The retention of this building will have a minor increase in intensity as the building will provide offices for staff, but this change will not transform the consent.

3.28 The modifications do not change the essential features of the approved development and therefore notwithstanding the modifications, the amended proposal is still 'substantially the same development'.

3.29 The impacts of the development are not substantially different. The application as amended is considered 'substantially the same development' and therefore meets the test under S4.55 (1A) of the Environmental Planning & Assessment Act 1979.

Notification of the amendments

3.30 Given the nature of the modification, notification is unlikely to be required.

Any submissions made

3.31 If required, any submissions made will be considered.

4.0 STATUTORY CONTEXT

4.1 Planning Controls and Regulations

4.1.1 The relevant planning controls applicable to the Section 4.55 application are listed below:

- State Environmental Planning Policy (State and Regional Development) 2011
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
- State Environmental Planning Policy No. 55 – Remediation of Land
- Goulburn Mulwaree Local Environment Plan 2009

4.1.2 Given the nature of the changes proposed under this modification, the development will continue to satisfy all SEPPs.

4.1.3 Compliance with the applicable section of the GMLEP 2009, is discussed below:

Goulburn Mulwaree Local Environmental Plan 2009

Zoning

4.1.4 The site is zoned SP2 Infrastructure. The redevelopment of the site for the purpose of a Health Service Facility is permitted in the zone.

Height

4.1.5 Clause 4.3 of the LEP specifies the maximum Height of Buildings and objectives for development. The subject site has a maximum height limit of 8 metres. The works have an approved height of 21.285 metres.

4.1.6 In accordance with Clause 5.12 of GMLEP, the provisions of the LEP do not:

'restrict or prohibit, or enable the restriction or prohibition of, the carrying out of development, by or on behalf of a public authority, that is permitted to be carried out with or without development consent, or that is exempt development under State Environmental Planning Policy (Infrastructure) 2007'

4.1.7 As such, development standards such as the maximum building height standard do not strictly apply to the development.

4.1.8 Notwithstanding the modification seeks to retain an existing 3 storey building. No additional works are proposed under this modification.

Floor Space Ratio

4.1.9 Clause 4.4 of the LEP provides for the maximum floor space ratio (FSR). There is no FSR applicable to the site.

Heritage Conservation

- 4.1.10 Clause 5.10 of the LEP outlines the requirements for development of or within close proximity of heritage items and within or nearby heritage conservation areas.
- 4.1.11 The land is within Goulburn City Conservation Area and contains locally listed heritage item No. 181, being the Central Building and former pavilions. The identified heritage item is also listed on the Department of Health's section 170 Register (Heritage Act 1977).
- 4.1.12 The retention of Ward Block will have no impact on the heritage listing of the site. The building will provide office space for staff to further support the hospital.

4.2 Mandatory Matters for Consideration

- 4.2.1 The relevant statutory requirements for the project are outlined in **Table 2** below:

Table 2: Statutory Requirements for Modification

Category	Action Required
Whether the development to which the consent as modified relates to substantially the same development.	Refer to Section 3 above, the retention of hospital buildings, previously approved for demolition, is considered to be substantially the same development.
Permissibility	The site is zoned SP2 Infrastructure. The redevelopment of the site for the purpose of a Health Service Facility is permitted in the zone. Retention of the Ward Block will maintain an existing hospital building, which is consistent with the zone objectives.
Heritage Impacts under GMLEP 2009 and Section 170 Register.	Refer to Section 4.1 above, the retention of the building will have no adverse heritage impact.
Referral to any external authorities.	No referrals required.
Notification	Department to determine if notification of the amendment is required.
Any relevant provisions of Section 4.15(1) of the EP&A Act 1979	The proposed modification has considered the relevant provisions of Section 4.15(1) of the EP&A Act as shown in this Section and Section 6 below. The modification does not alter the existing compliance with the GMLEP 2009. The proposal seeks to retain the Ward Block, that was previously approved for demolition. There will be no changes to height and no impact on heritage listed buildings, as discussed in this Section above. A separate compliance table is not required, as there are no numerical changes as shown in Table 1 above.

5.0 COMMUNITY ENGAGEMENT

- 5.1 The proposed modification, to retain the Ward Block, previously approved for demolition did not undergo further community engagement as it is considered that its retention will not detrimentally affect the community, refer to Section 6 below.
- 5.2 Notwithstanding, should the Department require the application to be advertised or notified, this will be undertaken as part of the assessment process.

6.0 ASSESSMENT OF IMPACTS

6.1 The Likely Impacts

- 6.1.1 This statement of effects has considered the potential impact of the modified development on surrounding properties, the streetscape and the environment.
- 6.1.2 As demonstrated in Section 3, above, the proposed retention of the Ward Block is still considered to be substantially the same development and can be considered under Section 4.55 of the Environmental Planning and Assessment Act.
- 6.1.3 An assessment of the environment impacts for the modification are discussed below.

Visual Impact

- 6.1.4 Ward Block is visible beyond the maternity building and will be further visible when this building is demolished for the construction of the carpark. The building is a three storey structure and it partly screened by the row of mature street trees to the north and south along Albert Street. The building is setback approximately 21 metres from the Albert Street boundary.
- 6.1.5 Under the original approval, the area occupied by Ward Block was partly to be occupied by 6 car parking spaces. The layout of the carpark was subsequently amended under a Modification application (SSD 8667 MOD 2). A further modification application is being prepared for further amendments to the layout of the carpark. The modification is being driven by the insufficient aisle widths and providing an improved layout to reflect the retention of Ward Block.
- 6.1.6 The retention of this existing building is consistent with the existing streetscape and will provide for the needs of the hospital without compromising previously approved car spaces.
- 6.1.7 **Figure 5** illustrates the approved buildings to be demolished, including Ward Block, while **Figure 6** below illustrates the retention of Ward Block:

- 6.1.8 As shown above, the visual impact will be reasonable as it he building is positioned towards the middle of the hospital complex and reduces view lines from the public domain.
- 6.1.9 All upgrade works will fall within the exempt provisions of SEPP (Infrastructure) 2007, as such no works are sought under this application. The building will remain in-situ.

Car Parking

- 6.1.10 The proposed modification involves the retention of Ward Block that was approved to be demolished. This modification does not propose the provision of additional car parking. A strategy for the provision of parking across the site was approved under the SSD approval. The assessment was undertaken on the basis of the new Acute Services building and determined that there was sufficient parking to accommodate the intensification of the site. As approved, there are a total of 197 spaces being provided.
- 6.1.11 A Traffic Impact Assessment has been prepared by Stantec and accompanies this application at **Appendix 2**. The report confirms that the retention of Ward Block is not expected to result in any increase in parking demand or traffic generation to that estimated and assessed as part of the Transport and Accessibility Assessment prepared by TTW that accompanied the approved SSDA. Further, no additional parking is required as Ward Block is a transfer of existing services within the hospital with the addition of Health Information Services, ANU teaching clinic rooms and a new Comms room. The need for the additional GFA has also arisen from floor loading constraints for storage as Health Information Services has not transitioned to an electronic file system, inefficiencies of the current layout and COVID area requirements.
- 6.1.12 As a result, no additional parking is proposed or required as part of this application to retain Ward Block.

Heritage

- 6.1.13 Perumal Murphy Alessi prepared a Heritage Impact Assessment (HIA Report) to support the original SSD application and the subsequent Modification application. The subject building was not identified as having heritage significance. The site itself is considered significant for a range of reasons, which will not be impacted by this modification, including:
- *Retention of the hospital and community uses on the site;*
 - *Retention of the street layout and subdivision pattern;*
 - *Provision of a new Acute Services building that will complement the site and its historic importance;*
 - *Demolition of perimeter buildings to enable open carpark and landscaped areas.*
- 6.1.14 In addition, the position of where the building is situated, at the centre of the site, will also assist with reducing impacts on the listed heritage items.
- 6.1.15 On this basis, it is considered that the retention of Ward Block will not have an adverse heritage impact and retention should be supported. The approved drawing list mitigation measure is recommended to be modified as shown at **Appendix 3**.

6.2 The Suitability of the Site for the Development

- 6.2.1 The site remains suitable for the approved and modified development. The site will deliver as envisaged by the SSDA a new Acute Services Building to support the needs of residents within the area and within convenient proximity to Goulburn.

6.3 The Public Interest

- 6.3.1 It is in the public interest to allow the orderly and economic development of the Goulburn Hospital site. The retention and re-use of an existing building will have no unreasonable adverse environmental, economic or social impacts, and has general merit.
- 6.3.2 The retention of Ward Block will enable the efficient use of existing resources on the site which is in the public interest.

7.0 JUSTIFICATION OF THE MODIFIED REPORT

- 7.1 The proposed modification will enable the efficient use of an existing resource on the site to support the ongoing functions of the Goulburn Base Hospital.
- 7.2 This report has demonstrated that the proposed modification addresses the requirements of Section 4.55(1A) of the Act and is considered substantially the same development.
- 7.3 The retention of the building will in no way affect the State Government's commitment to upgrading and providing improved services within the Goulburn Hospital for the wider community, as the existing SSDA has approved the new acute services building which is already under construction and this ensures that the project continues to achieve the intent and strategic goals within the East Tablelands Regional Plan 2036 and Goulburn Mulwarre Employment Land Strategy.
- 7.4 Retention of the Ward Block (Buildings H and M) will not affect future buildings, as following demolition the area was to be utilised as landscaped area and a portion for future car parking, which has recently been removed under a modification.
- 7.5 The building will not detrimentally affect the heritage significance of the nearby Central Building and Original 1887 Pavilions, which are identified as heritage items under the GMLEP 2009, Section 170 Register and are recognised by the National Trust of Australia (NSW). The Ward Block is positioned to the side and behind these buildings towards the centre of the site, not impacting adversely on the curtilage of these items, that will still be improved with works approved and undertaken under SSD 17_8667.
- 7.6 It is reasonable and cost effective to retain Buildings H and M, the building will support the future needs of the hospital and wider community with adverse effects on heritage, traffic, parking and servicing. The Ward Block will continue to satisfy the strategic direction of the locality and will support the improved hospital facility and satisfy the strategic and local planning controls without adverse impacts.
- 7.7 Accordingly, the modification to SSD 17_8667 to facilitate the retention of Ward Block is recommended.

Appendix One

Appendix Two

Appendix Three

Mitigation Measures to be modified

To give effect to the proposed modification, the application seeks to modify the following mitigation measure:

Condition A2(d)

DWG No.	Rev	Name of Plan	Date
AA01-0101	D	Site Plan Demolition	30/11/18
AA-01-01	B		22/11/2019
AA-01-01	C		16/02/2022
AR-02-02	L	Site Plan – Proposed Main Works	23/08/18
AA-02-02	B		22/11/2019
AA-02-02	C		16/02/2022

There are no other mitigation measures that require modification.



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