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20 April 2018

Your Ref: SSD 8667

Ingrid Berzins
Social Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ingrid

**Goulburn Mulwaree Council Preliminary Comments
Goulburn Base Hospital Redevelopment
130 Goldsmith Street, Goulburn (Your Ref: SSD 8667)**

I refer to the above matter which was reported to the Council meeting held 17 April 2018. At the meeting, Council resolved that:

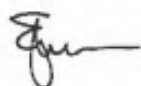
1. *The General Manager's report on the submission to the Goulburn Base Hospital Redevelopment be received.*
2. *Goulburn Mulwaree Council notifies the Department of Planning that it strongly supports the redevelopment of the Goulburn Base Hospital*
3. *Council endorses the submission attached to this report to be forwarded to the Department of Planning noting the specifics of paragraph 4 of this resolution*
4. ***The Department of Planning be notified that in terms of the car parking, Council requires the following direction to be implemented (for both during construction and ongoing operations):***
 - (a) ***Further analysis to determine the traffic and parking impacts during construction and operation of the development;***
 - (b) ***Once sufficient information has been provided by the applicant, Council and the community should be provided a further opportunity to comment;***
 - (c) ***Council welcomes the opportunity to discuss options for addressing parking demands with Health Infrastructure and the Southern NSW Local Health District;***
 - (d) ***Health Infrastructure and the Southern NSW Local Health District hold a public meeting to discuss options for addressing parking issues.***
5. *Council request an urgent meeting with Health Infrastructure and Southern NSW Local Health District to discuss all options for car parking and all other infrastructure requirements in the vicinity of the Goulburn Base Hospital during both construction and ongoing long term operations. Health Infrastructure to provide options that minimise client, patients, visitors and staff parking in neighbouring residential streets and take into account the other highly trafficked facilities in the area namely Goulburn High School and Victoria Park.*

The application documentation, although currently incomplete, has been reviewed by Council and preliminary comments are summarised in the attached table.

Please find a copy of the submission referred to in (4) above attached for your information.

I can be contacted on (02) 48 234 535 if you would like to discuss this matter further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emma-Jayne Leckie', with a stylized flourish at the end.

Emma-Jayne Leckie
Acting Director, Growth Strategy & Culture

Goulburn Base Hospital Redevelopment

Document	Preliminary Comments
General Comments	<p>It is difficult for Council to ascertain the final outcome in the precinct without the details of the projected need for such care and the timeframes associated with this need. The resulting outcome of an additional 23 beds implies there could be further stages to address the needs of this growing community. Council is proactively supporting the growth of our population and is an anchor for surrounding communities as the regional centre. It is a reasonable assumption that retrofitting may be required in the future and how is this going to be managed, particularly considering the context of the site and the heritage buildings present. Further stages or intensification of use may justify the provision of a multi-storey car park, for example. The desire for colocation of services (as identified in Council's Employment Land Strategy) into the future will provide further pressure on the existing situation.</p> <p>The documentation is somewhat inconsistent. P.49 refers to an 'additional application' creating more parking spaces on the site. The application needs to address the past parking deficiency on the site. The development is making an existing condition worse despite the provision of additional parking spaces through the cumulative impacts. There needs to be transparency around this issue and Council encourages further discussion.</p> <p>The development attracts s64 Developer Servicing charges and s94A Levy in accordance with Council's current policies. The s94A Levy is payable for all developments 'to assist the Council to provide the appropriate public facilities which are required to maintain and enhance amenity and service delivery within the area'. It is Council's position that the relevant s94A levy is applicable and payable for this development. In accordance with the policy, Council may consider exempting components of the development where a comprehensive submission justifying the exemption is provided. Alternative options could be discussed such as further investment into the protection and conservation of the existing heritage buildings on the site, and investment into improving parking provision in the vicinity of the site.</p>
Section 6 – Statutory Planning Considerations	<ul style="list-style-type: none"> ▪ The logistics and management of the operations of the hospital need to be considered, e.g. staging of the development to ensure that the hospital service to the community is maintained, during the construction phase of the development. Also effective communication (pedestrian and traffic control plan) is recommended during the construction phase of the development to ensure ongoing public safety. Accessibility is also required to be maintained. ▪ The proposal is traffic generating development- Goldsmith Street is a classified State road. The proposal needs to be considered by the RMS under the infrastructure SEPP. ▪ Advice should be sought from WaterNSW as to whether or not the proposal achieves a neutral or beneficial impact on water quality. Concurrence is required. ▪ The proposal appears to propose signage ('Goulburn Hospital' on the building) therefore the proposal is required to be considered against SEPP No. 64 (unless compliant under exempt signage provisions in Infrastructure SEPP).

Goulburn Base Hospital Redevelopment

Document	Preliminary Comments
Section 7 – Non-Statutory Planning Considerations	<p>With regard to the Long Term Transport Masterplan 2012, the documentation responds that there is a bus stop at the front and plenty of parking provided and a Green Travel Plan will be developed as development of the site progresses. This is generic statement and makes no firm commitment to make alternative modes of transport available (nor suggests any will). For example, with regard to bicycling, it states that there will be end of trip facilities to be included in <u>future</u> developments at the hospital. The proposed works will take a number of years to complete and, in the meantime will result in an increase in staff numbers and patronage. Provision should therefore be included with the current application because the timeframe for future development of the site is unknown.</p> <p>Further, the documentation considers that the proposed hospital redevelopment is a benign development of the site in terms of the relationship with its patrons particularly drug and alcohol affected patients. Work, Health and Safety considerations will form an integral part of the operations of the site as a medical facility. However, the documentation submitted does not demonstrate how the proposed development has addresses all of the CPTED principles specifically those that consider the design of development in mitigating the opportunity for physical crimes and assaults. Increased risks to hospital staff and patients should be considered at the design stage in an inherently emotional and stressful environment.</p>
Section 8 – Environmental Impact Assessment	<ul style="list-style-type: none"> It is recommended that the ancillary components of the development such as air conditioning units, generators and rainwater harvesting are considered as part of the DA. Where possible, these units and tanks should be screened from public view. They are unsightly and make the development unattractive. It is acknowledged that although the proposed building will be setback a significant distance from the street frontages, expansive hardstand spaces from car parking in front of the building can detract from the setbacks proposed. A significant landscaping proposal that corresponds to the scale of the development (including the car park) is required that ensures that landscaping provides a positive and strong impact to the street and provides good amenity to car park users (e.g. shade trees, a variety of planting forms). With landscaping it is important to ensure that maintenance schedules are established to ensure the landscaping's on-going positive impacts.
Section 9 – Mitigation Measures	<ul style="list-style-type: none"> Any proposed road closures or works should involve the prior consultation and approval of Council. Matters such as landscaping and lighting require on-going maintenance schedules so as to ensure their effectiveness for the life of the development, e.g. replacement of dead plants, irrigation, fertilising, mulching replacement, removal of litter, replacement of damaged lighting or lighting that does not work, replacement of removed or damaged signage, maintenance of security systems, etc.
Section 10 – Conclusion And other comments	<ul style="list-style-type: none"> Fig 11 pg 24 shows existing lots. Site should be consolidated into 1 lot to comply BCA (or at least relevant lots applicable to the new building/works).

Goulburn Base Hospital Redevelopment

Document	Preliminary Comments
	<ul style="list-style-type: none"> ▪ Goldsmith Street Classified State Road. Site therefore has direct access to classified road and greater than 100 beds therefore Traffic Generating Development. Not identified as TGD and frontage to classified road in EIS pg 59. Alternatively increase to hospital is 23 additional beds, however development of significant scale so as to treat as TGD. ▪ S4.10 States no tree removal proposed. Fig 40 pg 42 shows tree in disturbance area. 54 trees proposed to be removed. ▪ P47/48 consultation. Has NSW Ambulance service and NSW Police been consulted as not listed. Council's agreed protocol requires NSW PS to be consulted for Hospital development. ▪ No signage listed in EIS. However Building Identification name and emergency etc proposed and should be assessed under SEPP 64. ▪ Height of Building assessment on pg 62 relies on cl 5.12 LEP, however clause 5.12 does not apply to this development (should not limit or restrict the use of <u>existing crown buildings</u>). This is a new crown building that is linked to existing building/s. <i>Proposed HOB is 21.96 with the LEP max. limit of 8m.</i> Despite the interpretation of clause 5.12 not being fully applicable consideration of a variation to the HOB under clause 4.6 LEP should be requested and granted (should there be no additional unjustified reasons due to the benefit to the community and no significant Heritage Impact. ▪ S8.5 ESD Solar photovoltaic system (panels) should be considered for energy saving. Rainwater tanks are mentioned – where are they located? Recycling demolition material into landscaping ie use of any significant bricks etc? Can windows be opened in new building? Benefit now that windows can be opened to take advantage of cool evening change in summer. ▪ Waste storage area? Machinery storage area? ▪ Fit-out of Kiosk plans do not appear to be included? ▪ Demolition should require a photographic record in accordance with Heritage Office ▪ Require plan of consolidation ▪ Contributions refer to page 103 seeking no contributions required. ▪ Trade Waste application and assessment is required ▪ Crown development does not get a CC so the Determination Notice should note the conditions of consent that are required to be complied with '<i>Prior To Certification Of Crown Building Works (Or Where No Certification Is Required Prior To Commencement Of Work)</i>' ▪ Something that could be addressed is a designated smoking area within the hospital grounds. Often there is at least one smoker within the Goldsmith Road reserve. ▪ As Council's normal practice is to at least notify adjoining/adjacent property owners, this is recommended so that there is an opportunity for submissions to be received. Advertising of the development in the local newspaper is also recommended.

Goulburn Base Hospital Redevelopment

Document	Preliminary Comments
Appendix 2b – Photomontages	Plans clear to Goldsmith St, difficult to interpret for other elevations
Appendix 5 – Hazardous Building Materials Assessment – Part 1 - 3	<ul style="list-style-type: none"> ▪ The report provides comprehensive detail in relation to material contained within the parts of the existing hospital precinct that will be subject to the redevelopment, including a detailed register containing photographic records of the specific locations of such material. ▪ The document only provides detail on which materials are present. There are no details in relation to risk assessment, safe work procedures or control measures for dealing with the material throughout the development. It would be recommended that a plan detailing this information be prepared and made available for Council comment prior to the commencement of works onsite. ▪ Council requests that all disposal records of hazardous building materials are made available to ensure that the material is disposed of at suitable and appropriately licenced premises.
Appendix 6 – Preliminary Environmental Site Assessment – Part 1 - 5	<ul style="list-style-type: none"> ▪ Appendix 6 Part 1 response ▪ Draft condition comply with Table 12-2: Regulatory Requirement ▪ The land (west half of total Hospital Site) is identified as potentially contaminated on Council’s GIS reasons for listing should be investigated and provided to applicant
Appendix 7 – Transport and Accessibility Statement – Part 1 - 3	If there are any existing laybacks that will be made redundant following the proposed works (i.e. the laybacks are no longer needed for access) these must be reinstated to kerb and gutter and grass nature strip. If additional car parking can be facilitated, additional line marking is required to be carried out to delineate additional car parking spaces (this will require an approval for works within the road reserve, from Council and/or RMS).
Appendix 8 – Preliminary Construction Traffic Management Plan	<ul style="list-style-type: none"> ▪ Emergency vehicles getting caught up in Goldsmith Street - ie if you have trucks lined up there is no where they can get past them ▪ There is another report titled “Traffic and Parking Schematic Design Report” (26/09/17) that discussed alternate temporary parking during the construction period, however, this aspect is overlooked in this report.
Appendix 9 – Ecologically Sustainable Design Statement	This document is presumably only provided to support that the proposal will meet the ecologically sustainable design criteria (SEAR 6).
Appendix 10 – Statement of Heritage Impact- Part 1 - 3	Refer to Heritage Advisor’s response attached

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Document	Preliminary Comments
Appendix 11 – Acoustic Report	<ul style="list-style-type: none"> It should be noted that methodology is based on the previous Industrial Noise Policy 2000 which has been superseded by the Noise Policy for Industry 2017. It is not believed that this will create substantial compliance implications however it should be noted as there has been significant changes to the Policy. Consideration should be given to the undertaking of condition reports for any items of heritage significance or items of a contributory nature to the Heritage Conservation Area as vibration from construction is expected and could have a potential impact. The proposed Construction Noise and Vibration Management Plan referred to in Part 6 of the Acoustic Report should be provided to Council for review and comment prior to implementation and or commencement of construction.
Appendix 14a – Hydraulic Services Report	<p>Water</p> <ul style="list-style-type: none"> The existing dedicated fire service off Goldsmith St is dia 150mm not 100mm as indicated Existing service arrangement for domestic supply is a two directional supply as depicted in WSA Water Supply code p201 figure 18.4 example “B” Currently no backflow device is installed on the domestic service at the property boundary in Faithful St. It was removed because of low pressure servicing difficulties Backflow device is to be provided by the proponent not Council. Limit of Council responsibility will be the back end of any new water meters required <p>Sewer</p> <ul style="list-style-type: none"> The sewer diversion works are complete. Council’s sewer mains have been relocated outside the hospital property Council is to formally relinquish ownership of the previous council main to the NSW Health Department and be deemed an internal house drainage line. As no easement exists, extinguishment of an easement is not required Augmentation works are required - 500m of 225mm sewer mains from the hospital discharge point (in Faithful St) to councils existing trunk mains in Bourke St <p>Other</p> <ul style="list-style-type: none"> Paragraph 2: A divided valve arrangement exist and shall remain active. Paragraph 5: council is currently changing water pressure zones to achieve a higher dynamic & static pressure in the Faithful St main servicing the hospital site. This should provide a static pressure of approximately 65m head (650Kpa). This needs to be confirmed.

Goulburn Base Hospital Redevelopment

Document	Preliminary Comments
Appendix 14b – Hydraulic Services Plans	<p>Refer to Drawings H100, H101 and H102. Council will provide a quotation upon receiving an application for the following:</p> <ul style="list-style-type: none"> ▪ Disconnect & cap the existing 150mm fire service in Goldsmith St following commissioning of the new dedicated fire service off Faithful St. ▪ Install a new 150mm dedicated fire service from council's water mains to the property boundary in Faithful St, ready for downstream extension & installation of DCV with detector check meter by others
Appendix 15 – Landscape Plans – Part 1 - 5	<ul style="list-style-type: none"> ▪ The plans are professionally prepared and the analysis section is generally well considered. ▪ Page 104 mentions that there are areas of vegetation in the Goulburn region that contain River Red Gums. This is not the case. The relevant species found with Yellow Box is likely to be Blakely's Red Gum e.g. Eucalyptus blakelyi. River Red Gums are not sufficiently frost hardy to survive locally. ▪ The original hospital buildings are heritage listed and have a formal symmetrical layout albeit that asymmetric, unsympathetic additions have been added over the years. The proposed landscape design doesn't respect the formality of the original hospital. ▪ Arcadia plan page 120 > Detail Plan – Old Entry. ▪ The area in the immediate vicinity of the Goldsmith St frontage of the original Manfred designed buildings and including the crescent shaped driveway should be handled in a more formal way. This can then morph into the informal sensory garden proposed in the Northwest corner of Goldsmith and Albert Streets. The design is relevant to the area generally but not necessarily the hospital site specifically. ▪ There should be no planting directly against the historic buildings as this will have a negative impact on the buildings footings via increased water movement. A space of approx. 2.0m should be left with a suitable gravel surface layer. ▪ As noted below the existing Phoenix canariensis, Canary Island Date Palm should either be retained in situ or transplanted to a location as close as possible to its existing position for example in the proposed entry to the new building. ▪ Arcadia plan page 119 > Detail Plan – Main Pedestrian Entry. ▪ There is insufficient planted area to reduce the visual impact of the new buildings and expansive paved parking areas proposed. Additionally more shade trees should be used. This is particularly so for the uphill/western side of the entry 01 and the parking area off Albert Street. <p>Forwarded the Landscape Design Report to Louise Thom regarding the suitability of the informal design adjacent to the original heritage buildings</p> <p>The plan proposes the removal of the Eastern Wing of the original Manfred design. This is a significant impact on the fabric of the site. (See attached)</p>

Goulburn Base Hospital Redevelopment

Document	Preliminary Comments
Appendix 16 – Preliminary Waste Management Plan	Utilities - The preliminary waste management plan appears to adequately address waste needs however the location of waste collection during construction and permanent waste collection / storage bays needs to be identified on plans demonstrating they are to an adequate scale and location. Waste vehicles and access needs to be considered in traffic studies and all internal and external roads built to cater for waste vehicles where required.
Appendix 19 – Arborist Report	<p>The report uses a sound method of assessment and is thorough & professional.</p> <ul style="list-style-type: none"> One significant tree is proposed to be removed as a result of the new work. The tree identified as number 54 is a Phoenix canariensis > Canary Island Date Palm. It is located in front of the former Nurse's Quarters. See drawing TMP01 sheet 4 of 4. This tree should either be retained in situ & the design of the proposed car park altered to suit or it should be transplanted to a new location as close as possible to its existing location. Phoenix of this size can be successfully transplanted. The tree makes a significant visual contribution to the character of the hospital precinct and is part of the interpretation of the use and growth of the site. A number of other trees categorised as A or AA e.g. important trees, are proposed to be retained but have their TPZ (Tree Protection Zone) affected by the new work. The protection recommendations of the Arborist's report must be implemented to ensure the survival of these trees. See Appendices 4,5 & 6. <p>The plan proposes the removal of the Eastern Wing of the original Manfred design. This is a significant impact on the fabric of the site.</p>
Appendix 22 – BCA Assessment Report – Part 1 - 2	<ul style="list-style-type: none"> It is proposed to partially install sprinklers in the existing building and develop an alternative fire engineered solution with respect to non-compliances with the BCA. It is recommended that under the Provisions of Cl 94 of the EP & A Reg 2000 that the existing buildings be fire upgraded to comply with the Building Code of Australia and with any alternative solution it be considered that fire sprinklers be installed throughout all of the existing buildings.
	<p>WATER SERVICES</p> <p>S305 Application of Water Management Act will be required. The Application will be required to address all specific Water, Sewerage and Stormwater requirements for the development</p> <p>A section 305 lodgement fee of \$1,254 "special project" applies.</p> <p>The estimate of the Section 64 developer contributions will be assessed under the new Development Control Plan endorsed by Council on 08 November 2018. (A calculation of the fees required to be paid is attached and totals \$607,440.35)</p>

Goulburn Base Hospital Redevelopment

Document	Preliminary Comments							
	From the executive summary there will be a net increase of 23 beds and 8 oncology chairs for this project. Therefore assume a 31 bed increase:							
	ET Demand/Load	Water Directorate Category	Standard Unit	Suggested WD Values		Calculated values		
				Water ET	Sewer ET	Units	Water ET	Sewer ET
		Hospital	Per Bed	0.9	1.43	31	27.9	44.33
		ET Demand/Load					27.9	44.33
	Summary of Contributions		ET's	\$/ET	\$			
		Water	27.9	\$5,621.00	\$156,825.90			
		Sewerage	44.33	\$10,165.00	\$450,614.45			
		TOTAL CONTRIBUTIONS			\$607,440.35			

Goulburn Mulwaree Council

Heritage Referral Response

Date	23/03/2018	Development Application No.	
Date Received	20/03/2018	Further information received	22/03/2018
Assessment Officer	Louise Wakefield		
Property description	Goulburn Base Hospital, 130 Goldsmith Street, Goulburn		
Description of development	Alterations and addition to the existing buildings and construction of a new four storey acute services building		
Heritage Status	Heritage Item Goulburn LEP 2009 Schedule 5	Item No. Goulburn Base Hospital, Central Building, Pavilions (former, 1887) 130 Goldsmith Street Lot 1, DP 133606 Local Item 181	
	Conservation Area	Goulburn City Conservation Area	

Background

Statement of significance:

Goulburn Base Hospital is significant locally for the late Victorian style of its central building and pavilions, erected in 1887. The building was designed by the noted Goulburn architect, E.C. Manfred. SHI

The *Statement of Heritage Impact* by Perumal Murphy Alessi dated November 2017 accompanying the Development Application provides a comprehensive and thorough assessment of the significance of Goulburn Base Hospital as well as providing grading of significance for the buildings and spaces on the site.

The above analysis indicates that Goulburn Base Hospital is of high local significance. The architectural character, form and detail of the 1887 main building and associated eastern and western pavilions and attached wings and connections, front circular driveway and garden setback and open character of the Goldsmith Street frontage make the strongest contribution to the significance of the site and demonstrates the growth and development of Goulburn. (Perumal Murphy Alessi)

The existing site is complex and reflects a century of incremental changes due to the constant evolution of health practices and modern medicine.

Today there are a large number of buildings, parking areas and landscaping on the site.

Proposed development and heritage impact

Alterations and addition to the existing buildings and construction of a new four storey acute services building. The works are largely contained within the north eastern section of the Hospital Site. Also proposed is the demolition of some of the existing buildings on the site and an increase in the car parking.

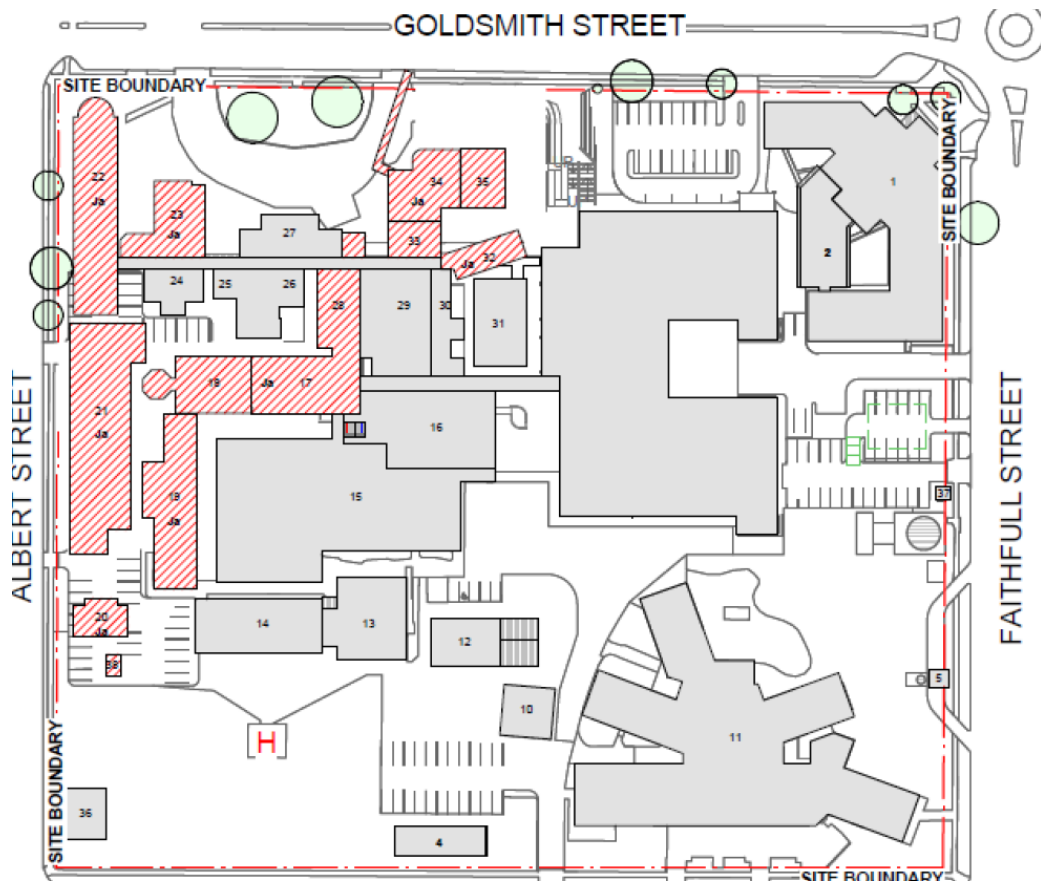


Figure 1. Demolition Plan and proposed new building footprints

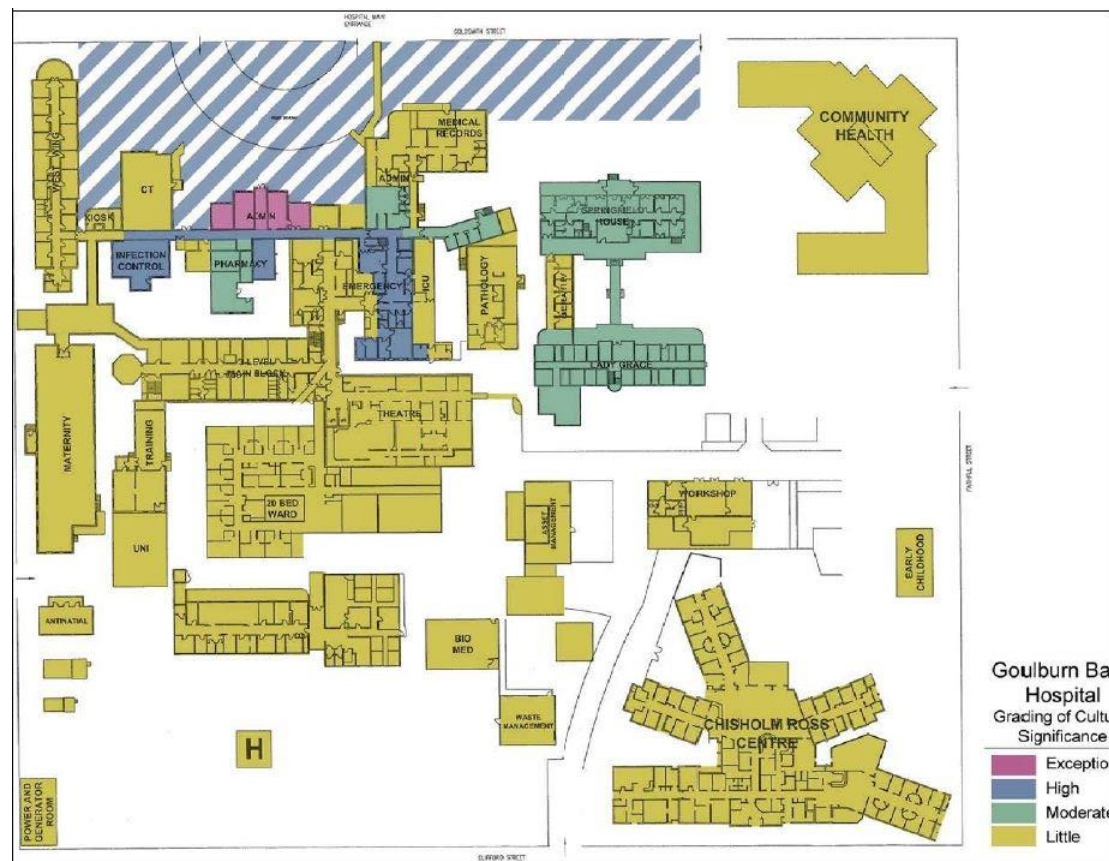


Figure 2 The SoHI grading of the relative heritage value of these buildings:

According to the SoHI the following buildings with moderate significance will be impacted by demolition or extensive refurbishment:

- The Community Health Building (Springfield House)
- Lady Gross House
- Pathology Speciman Collection
- Reception
- The emergency department

Moderate Significance

Includes fabric and relationships that are supportive of the overall significance of the item and have some heritage value, but do not make an important or key contribution to that significance. Also includes elements and features which were originally of higher significance but have been compromised later, less significant modifications or elements that have deteriorated beyond repair and cannot be reconstructed in a technologically feasible manner. (Perumal Murphy Alessi)

The proposed four storey building is to be located in the position of the Springfield House and Lady Gross House. It will be a prominent modern building that will provide a contemporary contrast to the fine grained architectural detail of the original 19th century buildings. The original buildings will still be front and centre and views to them will be improved by removal of the building on the corner of Albert and Goldsmith Streets. In addition the removal of the entry ramp and admissions building will improve the view from Goldsmith Street. The original carriage loop will be retained along with original trees, two Cedars of Lebanon and a Canary Island Date Palm.

According to the SoHI the Springfield House and Lady Gros Home have heritage value:

Springfield House (1927-28) and Lady Grose Home (1939) are both good representative and competent examples of Inter-war period buildings that despite some changes, alterations and additions retain a strong sense of their original character and details including face brick facades, open verandahs and balconies, timber windows and doors and roof form. Both buildings are relatively large and robust and due to the openness and low scale of the eastern section of the site are visually prominent elements. The front setback is significant and enhances the visibility of Springfield House.

The significance of these two building will be lost in the proposed development. Both buildings were subject to modifications in the 1950s and 1960s.

In general the proposed development has been carefully designed with consideration to the heritage values of the site and has achieved the retention of the most important buildings. The removal of some of the buildings graded as moderately significant is considered acceptable in the context of enabling the ongoing and continuous use of the site for its original and intended purpose. It is also recognised that hospitals as a building type are subject to ongoing pressure for change in order to avoid obsolescence.

Proposed Landscaping

The landscape plans for the development have also been provided for comment. The vision statement for the landscaping aims to “retain and incorporate heritage elements on site”. It does not however recognise the character of the heritage buildings and HCA and the need for balance with traditional landscaping in keeping with the period of these buildings. The design strategy is to extend the native bushland character of Goulburn into the Hospital site. However the HCA and the Hospital are highly urbanised areas with intact urban fabric from the 19th and early 20th century. The bushland character does not exist in the HCA and does not reflect the key historical periods of significance. The proposed bushland aesthetic would only be appropriate around the new building.

The bush garden that is proposed for the Albert and Goldsmith Street corner of the site is out of character with that part of the site. It is immediately adjacent to the most significant heritage buildings on the site and should therefore be a more formal garden reflecting the principals of garden design in the late 19th century. Figure 2 shows this area to be of moderate heritage significance in its own right. It should also allow views through from the HCA to the original Hospital buildings.

Recommendation

Supported. Recommended conditions:

1. The landscape plan for the corner of Goldsmith and Albert Streets should be amended to provide a traditional design that is more in character with the 19th and early 20th century context of the site and the Heritage Conservation Area.
2. The revised landscape plan should provide greater visibility of the 19th century Hospital buildings. The screening to the road should be removed.
3. Prior to Commencement: An archival record must be made of all buildings designated to be of moderate significance prior to any demolition. The record shall be prepared according to the documents published by the NSW Office of Environment and Heritage: *Heritage Guidelines, How to prepare archival recordings and Photographic recording of heritage items using film or digital capture*. The archival record is to be made prior to any works taking place.
4. Prior to occupation: A Conservation Management Plan for the buildings designated to have exceptional, high or moderate heritage value is to be submitted to the satisfaction of the approval authority.

Louise Thom
Goulburn Mulwaree Heritage Advisor