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Your Ref: SSD 8667

Luisa Maguire
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By email: luisa.maguire@planning.nsw.gov.au
cc: Ingrid.Berzins@planning.nsw.gov.au

Dear Ms Maguire,

RE: Heritage Division comments on exhibition of Goulburn Base Hospital Redevelopment (SSD 8667)

I refer to your email dated 21 March 2018 inviting comments on the above State Significant Development application for the redevelopment of Goulburn Base Hospital and associated works, including:

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

The site is not listed on the State Heritage Register, but is listed on the *Goulburn Mulwaree Local Environmental Plan 2009* (Item I81).

The documents considered in this advice include:

- *Environmental Impact Statement State Significant Development Application SSD_8667, Goulburn Base Hospital Redevelopment* (EIS), prepared by CityPlan Strategy and Development, dated March 2018.
- *Statement of Heritage Impact – Goulburn Hospital & Health Services Redevelopment* (SOHI), prepared by Perumal Murphy Alessi, dated November 2017.
- Architectural plans for the Goulburn Hospital Redevelopment, prepared by Billard Leece Partnership Pty Ltd, dated 25 September 2017.
- Landscape schematic design by Arcadia Landscape Architecture, Issue B, dated September 2017.
- Photomontages by NSW Health Infrastructure, undated.

The following comments are provided to assist you in your determination of the application:

- The existing Specimen Collection/ Pathology Collection (kinked) building and Reception buildings are part of the early development of the site and identified as being of “moderate” significance in the SOHI as they have been “extensively modified” and “no longer meet operational requirements”. It is unclear why the development necessitates the demolition of these elements as a revision of the proposal could see the retention, or the adaptation and incorporation of these elements into the new

development. The SHI submitted refers to previous considerations of the heritage options discussions held with the NSW Health but does not provide detailed assessment of what other options were considered for the development of the site. This information should be provided prior to further assessment of this SSD.

- The introduction of hardstand car parking into the Goldsmith Street setback in the location of the admissions building to be demolished would benefit from a landscape design aimed at softening this hardstand element to lessen the impact of the proposed car parking on the setting of the 1887 hospital building.
- The EIS notes that there is no signage proposed as part of this SSD and that a signage strategy is currently being developed. 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. Special consideration should be given to the design, size and location of proposed signage along Goldsmith Street to ensure it respects the character of the significant buildings forming part of the Goulburn Base Hospital.
- No heritage interpretation has been proposed, however it is pertinent considering the historical value of the site, and of the buildings proposed to be demolished, that an Interpretation Plan be development. Interpretation helps convey the history and significance of a place and should be integrated into the subject proposal through various devices including signage and landscaping.
- The Secretary's Environmental Assessment Requirements (SEARs) dated 25 August 2017 required that the EIS include an assessment of the historical archaeological resources on the subject site through the preparation of an historical archaeological assessment by a qualified consultant. This assessment was to identify what relics, if any, are likely to be present and provide an assessment of their significance and impact assessment on potential archaeological resources on the subject site. The SOHI indicates that the site is not identified on the Goulburn Archaeological Management Plan (AMP 2009), however, the EIS notes that the site is identified in the Goulburn AMP 2009. Whilst the assessment indicates that the site has low potential for archaeological resources, the SOHI has not demonstrated an adequate assessment of the study area to clarify the extant, integrity and significance of the archaeological resource on the subject site and outline mitigation measures appropriate to manage the potential resources. It is also noted that the EIS is not supported by a separate Historical Archaeological Assessment to clarify how the conclusion was reached about the low archaeological potential of the site.

It is, therefore, recommended that the following additional information be sought for review by the Heritage Council of NSW prior to the determination of the application, to enable a thorough heritage impact assessment:

- An amended SOHI which includes a detailed options analysis describing the alternative solutions that have been considered for the site and the reasons why these options were discounted; and
- The EIS should be supplemented with a detailed historical archaeological assessment prepared by a suitably qualified and experienced historical archaeologist. The assessment should be prepared in accordance with Heritage Council of NSW guidelines including *Archaeological Assessments 1996* and *Assessing Significance for Historical Archaeological Sites and Relics 2009*. Based on this supplementary assessment to address these elements in sufficient detail, the Heritage Council of NSW would be able to provide more specific advice for recommended conditions of approval to manage this resource.

If you have any questions regarding the above advice, please contact Kristy Wellfare, Heritage Officer, at the Heritage Division on (02) 8837 6039 or via email at kristy.welfare@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rajeev Maini', with a horizontal line underneath.

Rajeev Maini

Senior Team Leader

South Assessments, Heritage Division

Office of Environment and Heritage

As Delegate of the Heritage Council of NSW

23 April 2018