



View of old shed at Broken Hill Base Hospital (I25), NSW.

STATEMENT OF HERITAGE IMPACT

BROKEN HILL HOSPITAL KEY WORKER ACCOMMODATION

BROKEN HILL, NSW

MARCH 2024

Report prepared by
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for NSW Health Infrastructure

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EXECUTIVE SUMMARY

OzArk Environment & Heritage (OzArk) has been engaged by NSW Health Infrastructure (the proponent) to prepare a Statement of Heritage Impact (SOHI) for the proposed Key Worker Accommodation (KWA) at Broken Hill Hospital (the proposal). The proposal is in the City of Broken Hill Local Government Area.

The Key Worker Accommodation program is a NSW Government program that aims to provide modern short- and long-term housing accommodation to health workers in regional and rural areas across NSW to provide sustainable accommodation for health works close to health facilities.

The proposal involves the construction of two (2) two-storey modular accommodation blocks containing 20 units within the Broken Hill Base Hospital precinct. External staircases and footpaths will connect the staff accommodation to existing health care facilities.

The study area for the proposal includes an area of approximately 40 x 40 metres adjacent to the existing Workshop Store and Kincumber House at the Old Broken Hill Hospital precinct, south of Morgan Street.

The proposal will be assessed under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and this SOHI has been prepared to inform a Review of Environmental Factors for the proposal. Also applicable to the proposal is the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP).

The proposal is within the heritage curtilage of the nationally listed item, 'City of Broken Hill' (place ID 105861), the heritage curtilage of the 'old areas of Broken Hill Hospital' listed on the Broken Hill Local Environmental Plan (LEP) (item I25) and is immediately adjacent to the Oxide Street Heritage Conservation Area and Willyama Precinct (C2).

The proposal will not impact significant fabric or result in changes to the buildings and items with heritage significance that are within the heritage curtilage of the 'old areas of Broken Hill Hospital' (item I25). The proposal will also not impact the heritage values identified in the nationally listed item, 'City of Broken Hill' (place ID 105861) and will not impact the values associated with the adjacent heritage conservation area (C2).

It is concluded that the proposal will have a minor or inconsequential impact on the heritage values associated with the LEP heritage listing. As such, consultation with the Broken Hill City Council is not required under Section 2.11 of the Transport and Infrastructure SEPP.

To ensure the greatest possible protection to the Broken Hill Base Hospital's historical and aesthetic heritage values, the following recommendations are made:

1. The proposal can proceed unless there are changes in plan design resulting in impacts outside the proposal footprint, in which case further investigation may be required.
2. The works are occurring within the heritage curtilage of a locally listed item but will have a '*minor or inconsequential*' impact on the historic items within this curtilage. Under the Transport and Infrastructure SEPP (Section 2.61), the development can therefore proceed without consulting Broken Hill City Council. While further consultation with the Broken Hill City Council is not required under Section 2.11 of the Transport and Infrastructure SEPP.
3. No referral to the Commonwealth under the EPBC Act is required as the proposal will not harm the national heritage values of the City of Broken Hill heritage listing. However, the design of the modification and new construction the Broken Hill Development Control Plan and not impact the aesthetics of the nationally listed City of Broken Hill.
4. The risk of impact to significant archaeological deposits has been assessed as low. If potential historic artefacts with heritage significance are identified during works, the unanticipated finds protocol (**Appendix 1**) should be followed.

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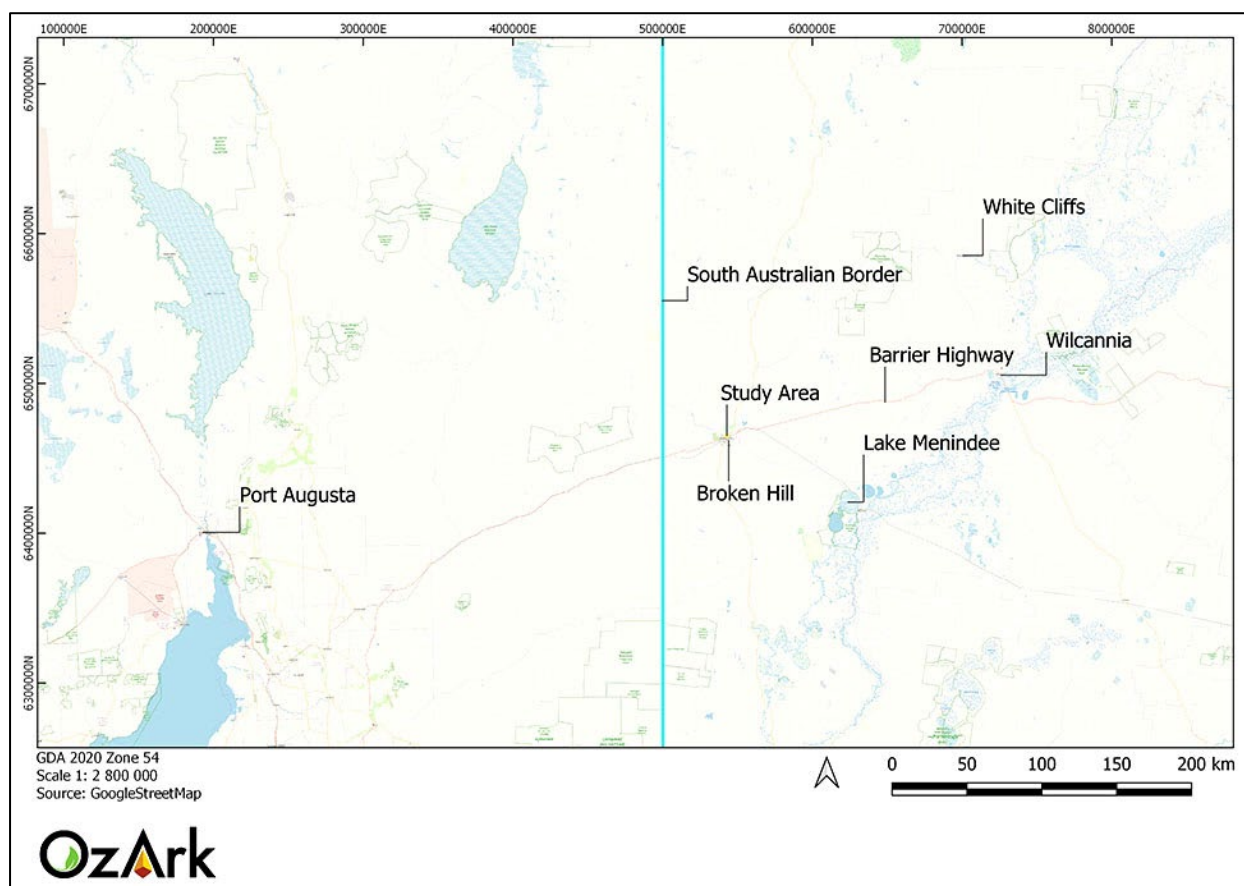
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1 INTRODUCTION

1.1 BRIEF DESCRIPTION OF THE PROPOSAL

OzArk Environment & Heritage (OzArk) has been engaged by NSW Health Infrastructure (the proponent) to prepare a Statement of Heritage Impact (SOHI) for the proposed Key Worker Accommodation (KWA) at Broken Hill Hospital (the proposal). The proposal is in the City of Broken Hill Local Government Area (LGA) (**Figure 1-1**).

Figure 1-1: Map showing the location of the proposal.



1.2 BACKGROUND

The KWA program is a NSW Government program that aims to provide modern short- and long-term housing accommodation to health workers in regional and rural areas across NSW. To deliver modern, sustainable accommodation for health workers close to health facilities. The NSW Government has committed \$45.3 million to deliver modern, sustainable accommodation for health workers in Far West, Murrumbidgee, and Southern NSW Local Health Districts, as part of the \$500 million funding boost for rural health projects.

1.3 STUDY AREA

The study area includes an area of approximately 40 x 40 metres (m) adjacent to the existing Workshop Store and Kincumber House at the Old Broken Hill Hospital precinct, south of Morgan Street at Lot 4376 DP757298. The study area is located within the township of Broken Hill within Far West NSW (**Figure 1-2**).

1.4 ASSESSMENT APPROACH

The SOHI has been prepared in accordance with the NSW Heritage Manuals *Assessing Heritage Significance* (DPE 2023a) and *Statements of Heritage Impact* (DPE 2023b) guidelines. The philosophy and process adopted is that guided by the Australia ICOMOS Burra Charter 2013.

Figure 1-2: Aerial showing the study area.



1.5 PROPOSED WORK

The proposal includes the construction of modern housing accommodation within the Broken Hill Base Hospital precinct to provide short- and long-term housing to specialist health workers. This involves the construction of two (2) two-storey modular accommodation blocks containing 20 units. External staircases and footpaths will connect the staff accommodation to existing health care facilities.

2 BACKGROUND

2.1 HISTORICAL BACKGROUND OF THE BROKEN HILL HOSPITAL

The original stone and wood hospital building was constructed in 1887 on the hill between Thomas and Morgan Street. Sir Henry Parkes placed the foundation stone (State Library SA 2023). The hospital initially consisted of six beds with the construction costing £260. The need for a local hospital arose from a spike in typhoid cases and was only a temporary structure (Kearns 1973).

A segment from *The Evening News*, a Sydney newspaper published on Friday 28 December 1888 describes the situation in Broken Hill:

A large number of deaths from typhoid fever has occurred lately. Messrs. Hanna, road superintendent, and Whysall, telegraph master, two highly esteemed Civil servants, have contracted the disease, and are at present located in a private hospital near Adelaide. The town is in a terrible state owing to defective sanitary arrangements. People continue to leave by trains daily in hundreds in view of the impending drought.

The temporary hospital became permanent in 1889 when the main building was constructed (State Library SA 2023). Other infrastructure was also constructed in 1890 to better cater to the health needs of mine workers and the general population of the town. Michael Birks, the Medical Superintendent for the Broken Hill Hospital, ascribed the poor health condition of miners to the absence of systematic examination of employees resulting in a nine-month strike by workers (Birks 1921:121). A total of £80,000 was deducted from the pay of employees so that the hospital could continue to operate and treat mine associated diseases such as pneumonia, silicosis, nystagmus, and lead poisoning (Birks 1921).

The women's and children's nightingale ward also had recorded financial contribution from workers. *The Australian Woman's Mirror* (1930:64), states a small "flea-bite" sized contribution per week to the maternity ward provided prenatal advice, serious operations, and post-natal care to the workers' families.

As a result of its deteriorating condition, the 1889 hospital was replaced by new hospital on Wednesday 24 September 1941 by Lord Wakehurst, the Governor of NSW, and was renamed the 'Broken Hill Base Hospital' (FBAA 1942). The Federate Builders' Association of Australia (FBAA, 11) described the opening of 'one of Australia's most interesting hospitals – that at Broken Hill'.

The 1941 hospital building featured a modernist design with a T-shaped plan, reinforced concrete frame construction, terracotta partition walls, and brick external walls (FBAA 1942). Wide balconies encircled each of the four floors (wards), and air-conditioning and ventilation was installed within the main building and the other hospital buildings (FBAA 1942).

The 1941 hospital was demolished in 1999 and the modern hospital complex was established on the corner of Chloride Street and Thomas Street in 2000. The decision was made to demolish the main building despite its heritage significance due to the presence of asbestos (AICOMOS 2010).

The northern areas of the hospital grounds comprise several buildings with identified historic significance (see **Section 3.1.4**). These buildings are shown on **Figure 2-1** and consist of:

- Former Refractory (built 1890)
- Former Operating Theatre repurposed as staff residence (built 1890)
- Elleoura Lodge, formerly the women's and children's nightingale wards (built 1890)
- Workshop Store, formerly the changing and x-ray rooms (built 1890)
- Kincumber House (built 1890 with later modifications in 1907, 1941, and 1961)
- Corrindah House, formerly the nightingale wards (built 1930).

Figure 2-2 shows historical views of the hospital precinct and **Figure 2-3** shows current views of items near the study area.

Figure 2-1: Old Hospital precinct and heritage items.

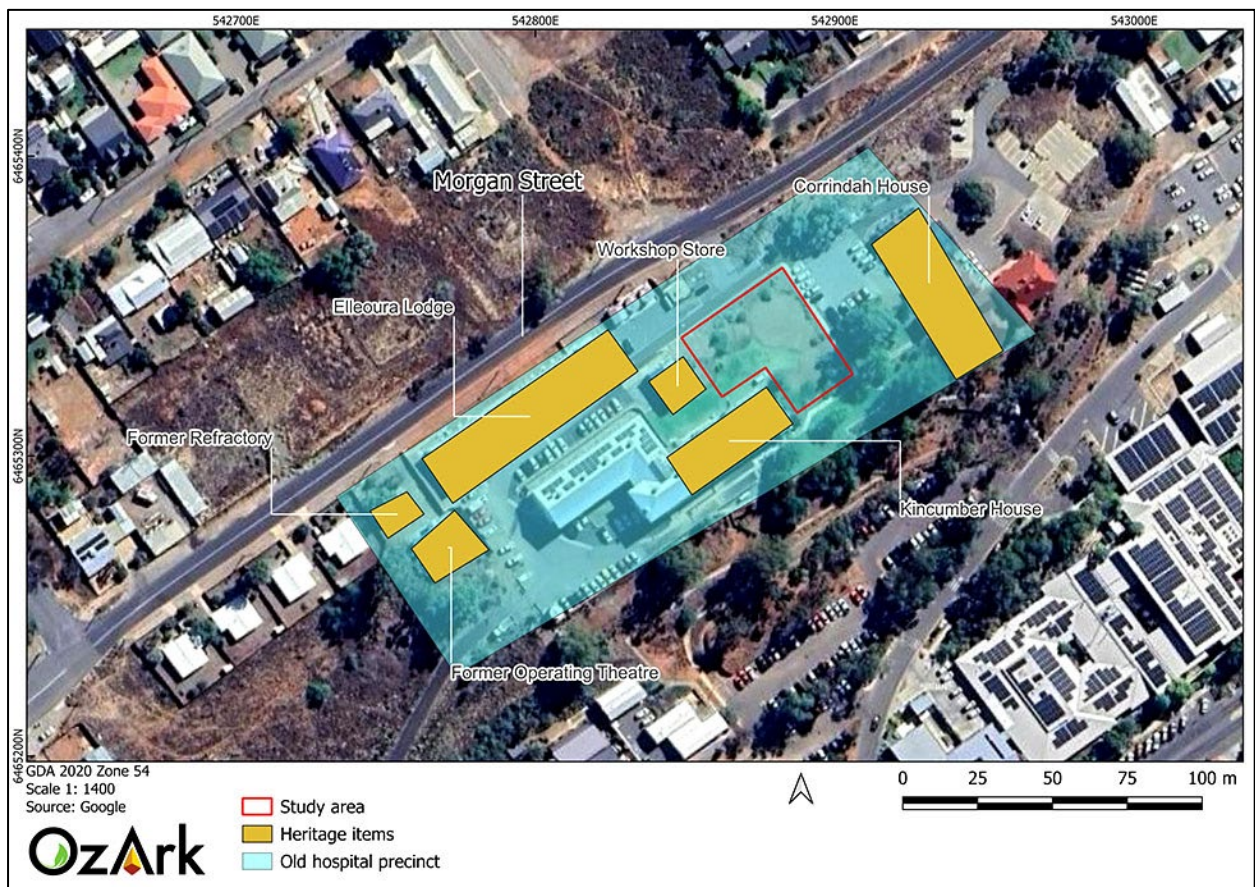


Figure 2-2: Historic views of the Broken Hill Base Hospital.


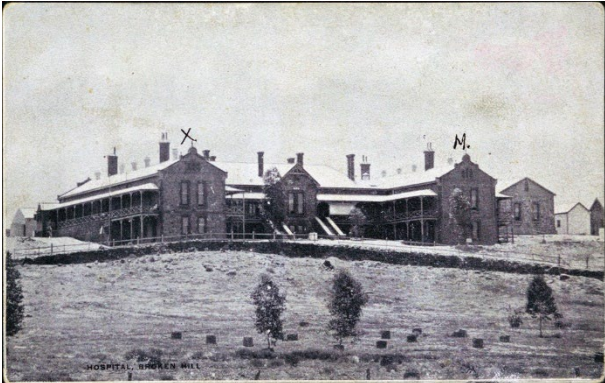


	
<p>1. Photograph of the permanent Broken Hill Hospital c. 1907 (image source: State Library South Australia).</p>	<p>2. Photograph of the permanent Broken Hill Hospital, Workshop Store, and other associated buildings c. 1909 (source: Wollongong University).</p>
	
<p>3. Photograph of the permanent Broken Hill Hospital c. 1930 (image source: State Library SA).</p>	<p>4. Photograph of the front of the redeveloped 1941 Broken Hill Base Hospital on 24 January 1942 (image source: State Library SA).</p>

Figure 2-3: Current views of the old hospital precinct.

1. Former approach to Kincumber House.



2. Kincumber House



3. Elleoura Lodge.



4. Workshop Store.

3 HERITAGE ASSESSMENT

3.1 RELEVANT LEGISLATION

3.1.1 City of Broken Hill National Heritage Listing

The City of Broken Hill was entered in the National Heritage List on 20 January 2015 (place ID 105861) due to its outstanding significance in Australia's mining and industrial history under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (DCCEEW 2015). The city was assessed against criteria to establish its contribution to the heritage of Australia through several specific values relating to the regions mining industry:

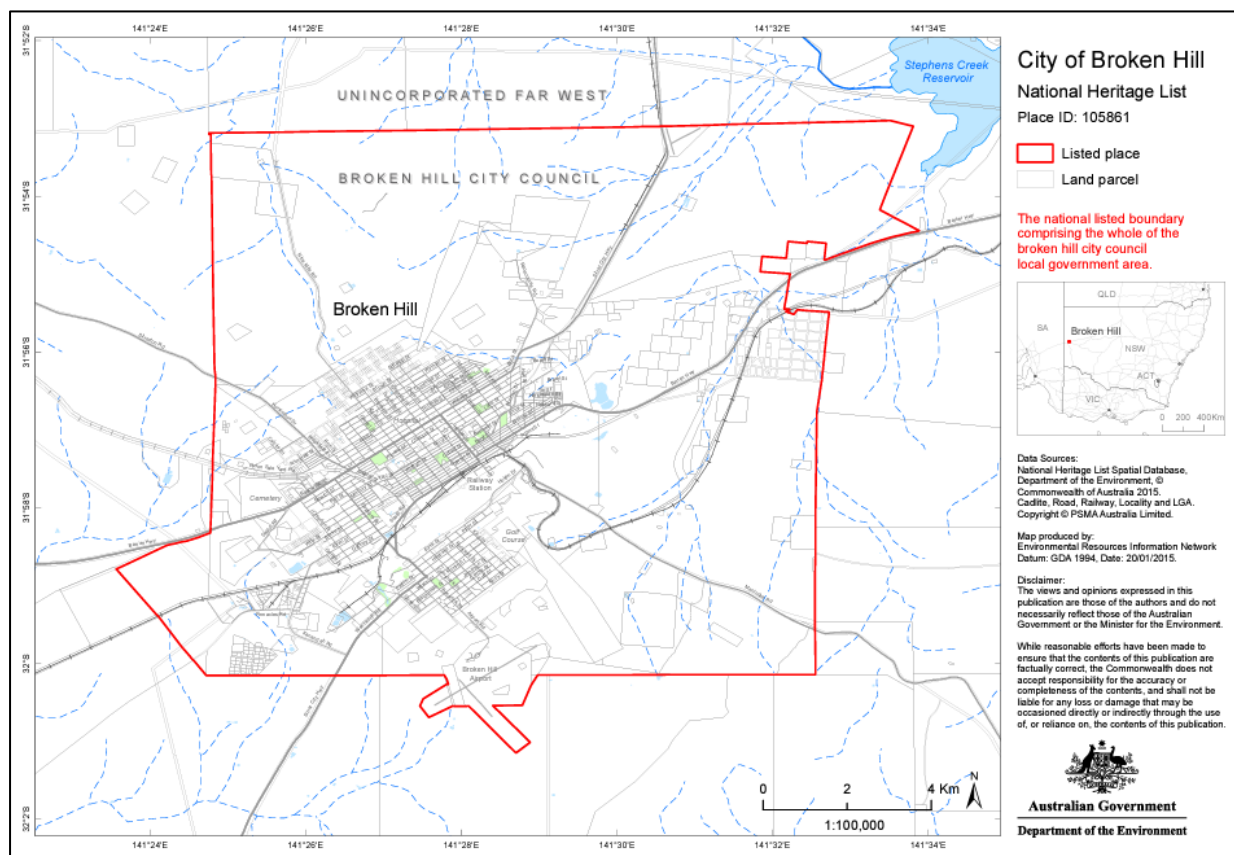
- Continued identification of new geological rare and uncommon species
- World leader in innovation of new mining practices, social characteristics, and mining practices
- Played a decisive role in national development through creation of wealth
- Long mining history since 1883 as one of the world's largest deposits of silver, lead, and zinc
- Demonstrates principal characteristics of mining towns from establishment
- Aesthetic qualities of mining landscape and rural town in late Victorian and Federation era
- Strong community spirit that symbolises importance of the mining industry and challenges of living in the outback
- Association with famous figures of the mining and film industry.

Within this listing are individual built items which are identified as of national heritage significance due to their function within the City of Broken Hill.

The hospital is not individually identified, and the item only has associative significance to the to the mining heritage values of the listing.

Figure 3-1 shows the boundary of the national heritage item which encompasses most of the City of Broken Hill.

Figure 3-1: Boundary of the City of Broken Hill National Heritage Listing (source: Department of Climate Change, Energy, the Environment and Water).



3.1.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes requirements relating to land use and planning. This Act, amended by the *Environmental Planning and Assessment Amendment Act 2017*, establishes requirements relating to land use and planning.

The framework governing environmental and heritage assessment in NSW applicable to the proposal is contained within the following part of the EP&A Act:

- Division 3.4: Environmental planning instruments—LEPs

A Council for its Local Government Area may make environmental planning instruments for the purpose of environmental planning. Any such instrument is called a Local Environmental Plan (LEP).

3.1.3 State Environmental Planning Policy (Transport and Infrastructure) 2021

Section 2.11 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) notes that works '*likely to affect the heritage significance of a local heritage item, or of a heritage conservation area, that is not also a State heritage item, in a way that is more than minor or inconsequential*' must have the impact assessed and written

notice provided to the relevant Council.

3.1.4 *Heritage Act 1977*

The *Heritage Act 1977* (Heritage Act) establishes the Heritage Council of NSW. The Heritage Council's role is to advise the government on the protection of heritage assets, make listing recommendations to the Minister in relation to the State Heritage Register (SHR), and determination of proposals that involve modification to heritage items or places listed on the SHR. Ordinarily, proposals involving the modification of a listed heritage item will require approval under Part 4 of the Heritage Act.

Automatic protection is afforded to 'relics', defined as 'any deposit or material evidence relating to the settlement of the area that comprised New South Wales, not being Aboriginal settlement, and which holds state or local significance' (note: formerly the Heritage Act protected any 'relic' that was more than 50 years old. The age criterion has since been dropped from the Act and relics are protected according to their heritage significance assessment by a qualified archaeologist rather than purely based on their age). Excavation of land on which it is known or where there is reasonable cause to suspect that 'relics' will be exposed, moved, destroyed, discovered, or damaged is prohibited unless authorised by an excavation permit issued under Section 140 Heritage Act.

3.1.5 Broken Hill LEP

The 'old areas of Broken Hill Hospital' are listed on the Broken Hill LEP 2013 as Item I25. The listing includes part Lots 3751, 4375 and 4376, DP757298. The heritage inventory for I25 does not provide information on the specific items within the I25 listing and it is assumed it is restricted to the surviving historic buildings detailed in **Section 2.1**.

The heritage conservation objectives of the Broken Hill LEP are as follows:

- To conserve the environmental heritage of Broken Hill
- To conserve the heritage significance of heritage items and heritage conservations areas, including associated fabric, settings, and views
- To conserve archaeological sites.

3.1.6 Applicability to the proposal

The proposal is within the heritage curtilage of an item protected by the EPBC Act, however, the hospital only has an associative significance to the identified national heritage values that mostly relate to the mining history of the city. Referral to the Commonwealth under the EPBC Act would only be required if it is determined that national heritage significance values will be harmed by the proposal.

The proposal will be assessed under the Part 5 of the EP&A Act and any significant heritage values within the study area are afforded protection under the Heritage Act.

3.2 HERITAGE SIGNIFICANCE OF THE 'OLD AREAS OF BROKEN HILL HOSPITAL'

Table 3-1 provides a heritage assessment of the old areas of Broken Hill Hospital following the assessment criteria within *Assessing Heritage Significance* (DPE 2023a).

Table 3-1: Heritage criteria relevant to the 'old areas of Broken Hill Hospital'.

Criterion	Response	Level of significance
a) Historical significance	The original Hospital was built in response to a health crisis in the region. The medical buildings in the old hospital precinct and the phases of construction reflect the growth of the area and the health needs of mine workers. The elements contained within the 'old areas of Broken Hill Hospital' have a contributory role to this historical significance.	Local
b) Associative significance	Sister Drummond Memorial Park celebrates the memory of Sister Irene Melville Drummond who is of local significance for her heroic sacrifice as an Australian Army nurse who died at the hands of Japanese soldiers on the 16 February 1942. Sister Drummond was a nurse at the hospital.	Local
c) Aesthetic significance	The stone and wood structures of the 'old areas of Broken Hill Hospital' depict the medical health infrastructure of rural mining regions and the construction method of the time. The spaces between the buildings of the old hospital precinct provided a relaxing environment to aid recovery of patients.	Local
d) Social significance	Hospitals have always been of social health importance as it is a place where activities relating to birth and death occur. The Hospital is a major rural health centre which has provided a range of primary and community health services in its history. The construction of these heritage items reflects the developing needs of the population of the City of Broken Hill. The mine workers of Broken Hill financially supported the hospital in addition to contributions by the Government and Mining Companies. This formed a financial and social connection between various stakeholders. The value extends beyond the physical structures to the spaces between the buildings as the function of the Hospital involved interaction between the different wards and rooms. The elements contained within the 'old areas of Broken Hill Hospital' have a contributory role to this social significance.	Local
e) Research potential	The old hospital precinct does not meet the criteria for research potential.	Nil
f) Rarity	The old hospital precinct is not a rare example of its type.	Nil
g) Representativeness	The old hospital precinct does not meet the criteria for representativeness.	Nil

3.3 ARCHAEOLOGICAL ASSESSMENT

A search of historical imagery was able to identify that the proposed KWA buildings will be situated on the land occupied by the eastern extent of Kincumber House prior to its partial demolition (**Figure 3-2**). As there are ground disturbing works being undertaken for the proposal, there is a minor risk of harm to archaeological deposits of heritage significance, if present. As such, the unanticipated find protocol must be followed (**Appendix 1**) in the unlikely event that significant heritage items are encountered during the construction of the proposal.

Figure 3-2: Aerial showing original Kincumber House location.



3.4 ANALYSIS OF THE PROPOSED WORKS

The heritage values of the 'old areas of Broken Hill Hospital' as defined in the LEP are associated with the physical fabric of the building structures located within the old hospital precinct and the spaces between these buildings. The value of these features stems from their association with significant life events for individuals within the Broken Hill region and surrounding areas.

The heritage values of the items have an aesthetic, social, associative, and historic dimension, as the 'old areas of Broken Hill Hospital' provided treatment for the Broken Hill region and surrounding areas and assisted in overcoming major health crises and mine related health issues which allowed the city to grow and flourish.

4 STATEMENT OF HERITAGE IMPACT

The *Guidelines for preparing a statement of heritage impact* (DPE 2023b) poses a series of questions that comprise the minimum information to form a SOHI which is required to properly address proposals impact items of heritage significance.

- Do the proposed works comply with Article 22 of *The Burra Charter*, specifically *Practice note 22 – new work* (Australia ICOMOS 2013b)?

Practice note 22 states that new work should respect the significance of a place through consideration of its siting, bulk, form, scale, character, colour, texture, and material. Imitation should generally be avoided.

- The proposed works comply with Article 22 of *The Burra Charter* as they will not disturb or obscure the cultural significance of the place, nor will they detract from its interpretation and/or appreciation.
- Are the proposed alterations/additions sympathetic to the heritage item? In what way (e.g. form, proportion, scale, design, materials)?
 - The proposed additions are sympathetic to the ‘old areas of Broken Hill Hospital’ as they are in an area which no longer contains built heritage items. The proposed structures will be restricted to two-storey accommodation blocks so as not to impede or obstruct the existing heritage buildings nearby, including Kincumber House and the Workshop Store.
- Will the proposed works impact on the significant fabric, design or layout, significant garden setting, landscape, and trees or on the heritage item’s setting or any significant views?
 - The proposed works will not impact the fabric, design, or layout of existing buildings within the ‘old areas of Broken Hill Hospital.’ However, the external landscape setting of the western section of the upper precinct will be affected by the new KWA additions. The relationship between the group of historic buildings includes external spaces and as such the spaces around these buildings must also be conserved. The open space between buildings formed part of the recovery environment and forms a precinct. It is not only the individual buildings that have significance but also the interaction between the different buildings.
- How have the impact of the alterations/additions on the heritage item been minimised?
 - The location of the proposed works is adjacent to multiple buildings and spaces which are part of the ‘old areas of Broken Hill Hospital’ listed in the LEP. However, it will not introduce elements that will dominate or distract from heritage values of items in the area.

- Are the additions sited on any known or potentially significant archaeological relics? If yes, has specialist advice from archaeologists been sought? How will the impact be avoided or mitigated?
 - The KWA development is located on the same land which previously housed the eastern extent of Kincumber House. Although all above ground sections of Kincumber House have been demolished within the study area, subsurface archaeological deposits, including remanent foundational infrastructure may be present. Therefore, an unanticipated finds protocol will be followed (**Appendix 1**) in the unlikely event that significant heritage relics or items are discovered during the construction phase of the proposal.
- Has specialist advice from a heritage consultant, architect, archaeologist, or services engineer been sought?
 - A heritage architect has not been engaged for the proposal; however, this report constitutes advice from a heritage professional and will be implemented by an architect.
- Do the proposed works impact views to, from and within adjacent heritage items?
 - The proposed works will not impede any significant views to and from the old hospital precinct and will allow the residents of the newly constructed KWA buildings to view the item from the upper levels of their dwellings. Existing pathways and access points will allow continued access to the heritage items by the public and hospital staff.

5 CONCLUSION AND RECOMMENDATIONS

The local heritage significance of the old hospital precinct is derived from its contribution to the health history of the Broken Hill region and its aesthetic contribution to the heritage environment of the city.

The addition of the KWA buildings will not have a physical or visual impact on the heritage values of the buildings of the old hospital precinct. The new additions will follow the Broken Hill Development Control Plan 2016. The Development Control Plan (2016:16) provides a design guide that states that all external materials of developments should be made of materials that are sympathetic in colour, texture, and range to be harmonious to the aesthetic heritage of the City of Broken Hill. This will allow the building design to not detract from the heritage significance of listed heritage sites and Heritage Conservation Areas (DCP 2016:50). Room forms should be sympathetic to ground slope and neighbouring buildings, which in the instance of the development, are the heritage items within the old hospital precinct.

As a result, the proposal will not introduce elements to the landscape that will detract or diminish the public's appreciation of the mining history of Broken Hill, the aesthetics of the mining landscape of Broken Hill, or impact places with a known association to well-known individuals. It is therefore concluded that the proposal will not have a significant impact on the heritage values of the 'old areas of Broken Hill Hospital'.

As the proposal will have a minor or inconsequential impact on the heritage values contained within the I25 listing, the proposal can be considered as 'development permitted without consent' under Section 2.61 of the Transport and Infrastructure SEPP.

The proposal will have negligible impacts to the heritage values of the nationally listed City of Broken Hill. The National Heritage listing of the City of Broken Hill relates largely to the city's mining history. The old hospital precinct does not relate directly or contribute to the values identified in the National Heritage listing of the City of Broken Hill and detailed in **Section 3.1.4**. As such, national heritage values will not be harmed. However, while the 'old areas of Broken Hill Hospital' is not of national significance, modification to the design of the Hospital must take care not to diminish the aesthetic values of the wider City of Broken Hill.

To ensure the greatest possible protection to the Hospitals' historical and aesthetic heritage values, the following recommendations are made:

1. The proposal can proceed unless there are changes in plan design resulting in impacts outside the proposal footprint, in which case further investigation may be required.
2. The works are occurring within the heritage curtilage of a locally listed item but will have a '*minor or inconsequential*' impact on the historic items within this curtilage. Under the Transport and Infrastructure SEPP (Section 2.61), the development can therefore

proceed without consulting Broken Hill City Council. While further consultation with the Broken Hill City Council is not required under Section 2.11 of the Transport and Infrastructure SEPP.

3. No referral to the Commonwealth under the EPBC Act is required as the proposal will not harm the national heritage values of the City of Broken Hill heritage listing. However, the design of the modification and new construction should be consistent with the Broken Hill Development Control Plan and not impact the aesthetics of the nationally listed City of Broken Hill.
4. The risk of impact to significant archaeological deposits has been assessed as low. If potential historic artefacts with heritage significance are identified during works, the unanticipated finds protocol (**Appendix 1**) should be followed.

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APPENDIX 1: HISTORIC HERITAGE: UNANTICIPATED FINDS PROTOCOL

A historic artefact is anything which is the result of past activity not related to the Aboriginal occupation of the area. This includes pottery, wood, glass, and metal objects as well as the built remains of structures, sometimes heavily ruined.

Heritage significance of historic items is assessed by suitably qualified specialists who place the item or site in context and determine its role in aiding the community's understanding of the local area, or their wider role in being an exemplar of state or even national historic themes.

The following protocol should be followed if previously unrecorded or unanticipated historic objects are encountered:

1. All ground surface disturbance in the area of the finds should cease immediately, then:
 - a) The discoverer of the find(s) will notify machinery operators in the immediate vicinity of the find(s) so that work can be halted
 - b) The site supervisor will be informed of the find(s).
2. If finds are suspected to be human skeletal remains, then NSW Police must be contacted as a matter of priority.
3. If there is substantial doubt regarding the historic significance for the finds, then gain a qualified opinion from an archaeologist as soon as possible. This can circumvent proceeding further along the protocol for items which turn out not to be significant. If a quick opinion cannot be gained, or the identification is that the item is likely to be significant, then proceed to the next step.
4. Notify Heritage NSW as soon as practical on (02) 9873 8500 (heritagemailbox@environment.nsw.gov.au), providing any details of the historic find and its location.
5. If in the view of the heritage specialist or Heritage NSW that the finds appear not to be significant, work may recommence without further investigation. Keep a copy of all correspondence for future reference.
6. If in the view of the heritage specialist or Heritage NSW that the finds appear to be significant, facilitate the recording and assessment of the finds by a suitably qualified heritage specialist. Such a study should include the development of appropriate management strategies.
7. If the find(s) are determined to be significant historic items (i.e. of local or state significance), any re-commencement of ground surface disturbance may only resume following compliance with any legal requirements and gaining written approval from Heritage NSW.