

Planning Proposal

Proposed Rezoning for the Goulburn Health Hub
at 37 Ross Street, Bradfordville

Prepared for Cullingral Pty Ltd | June 2017



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Planning Proposal for Goulburn Health Hub

Final

Report J14085RP1 Prepared for Cullingral Pty Ltd | 28 June 2017

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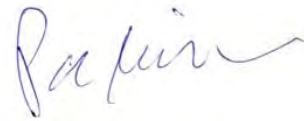
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Signature



Date 28 June 2017

Date 28 June 2017

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1 Introduction

This planning proposal has been prepared in accordance with the requirements of '*A guide to preparing planning proposals*' (Department of Planning, 2012) for the proposed rezoning of 37 Ross Street, Bradfordville, Goulburn (the site). It seeks new zoning boundaries that will provide:

- approximately 12.45 hectares (ha) of land for medical and community health facilities under the SP2 Infrastructure Zone under the Goulburn Mulwaree LEP 2009 (the LEP).

The outcome sought by this proposal will have substantial public benefits through the provision of specialist medical and health facilities to meet the future needs of the local community and surrounding area. The rezoning will allow for the establishment of a 24 hour hospital, aged care facility, oncology facility, rehabilitation hospital (both mental and physical) and ancillary shops. The development will be known as the "Goulburn Health Hub".

This report describes the site, the proposed rezoning and provides an environmental assessment of the proposed uses. It draws on various specialists technical reports appended to this proposal (refer to Table of Contents).

The proposal is made in accordance with Section 56 (Gateway Determination) of the Environmental Planning & Assessment Act 1979 (EP&A Act), which states:

- '(1) After preparing a planning proposal, the relevant planning authority may forward it to the Minister.
- (2) After a review of the planning proposal, the Minister is to determine the following:
 - (a) whether the matter should proceed (with or without variation),
 - (b) whether the matter should be resubmitted for any reason (including for further studies or other information, or for the revision of the planning proposal),
 - (c) community consultation required before consideration is given to the making of the proposed instrument (the community consultation requirements),
 - (d) any consultation required with State or Commonwealth public authorities that will or may be adversely affected by the proposed instrument,
 - (e) whether a public hearing is to be held into the matter by the Planning Assessment Commission or other specified person or body,
 - (f) the times within which the various stages of the procedure for the making of the proposed instrument are to be completed.
- (3) A determination of the community consultation requirements includes a determination under section 73A (or other provision of this Act) that the matter does not require community consultation.
- (4) The regulations may provide for the categorisation of planning proposals for the purposes of this section, and may prescribe standard community consultation requirements for each such category.

- (5) The Minister may arrange for the review of a planning proposal (or part of a planning proposal) under this section to be conducted by, or with the assistance of, the Planning Assessment Commission or a joint regional planning panel:
 - (a) if there has been any delay in the matter being finalised, or
 - (b) if for any other reason the Minister considers it appropriate to do so.
- (6) The relevant planning authority may, at any time, forward a revised planning proposal to the Minister.
- (7) The Minister may, at any time, alter a determination made under this section.
- (8) A failure to comply with a requirement of a determination under this section in relation to a proposed instrument does not prevent the instrument from being made or invalidate the instrument once it is made. However, if community consultation is required under section 57, the instrument is not to be made unless the community has been given an opportunity to make submissions and the submissions have been considered under that section.'

This planning proposal is at the first stage of the above process, that is the relevant planning authority (ie Goulburn Mulwaree Council (Council) or the Southern Region Joint Regional Planning Panel) has to decide whether or not to recommend to the Minister that the proposal should proceed.

1.1 Process to date

This planning proposal was originally submitted to Council in December 2014. Consideration of the proposal was deferred in October 2015, pending the outcomes of the now adopted *Goulburn-Mulwaree Employment Lands Strategy* (the ELS), November 2016.

The ELS concluded that the development of a Goulburn Health Hub has planning merit in both social and economic terms through the co-location of a range of health services for the community, job creation and flow-on effects to service industries.

The recommendations of the ELS are to:

- rezone 37 Ross Street from IN1 General Industrial to SP2 Infrastructure (health); and
- investigate alternate access to the site from Brewer Street as part of the rezoning.

A detailed traffic assessment was undertaken as part of the planning proposal in December 2014. This original assessment was based on the proposal that Ross Street/Taralga Road will be the main road network access point for the development.

An investigation of the proposal for an alternate access from Brewer Street (as required by the recommendation of the ELS) has been undertaken and is now included in Section 5.10 of this report. The information contained in the December 2014 traffic assessment in relation to existing roads and conditions, proposed traffic generation, parking, public transport and other modes are still relevant to this proposal and continue to be relied upon.

Council resolved to support the planning proposal at the 7 March 2017, Council meeting. Subsequent to that meeting it was discovered that in order to enable the consideration of an aged care facility to proceed on the site a modification to Schedule 1 –Additional Permitted Uses would be required.

This planning proposal has been updated to specifically seek a minor modification to the applicable planning instrument, the Goulburn Mulwaree LEP, to allow seniors housing in the SP2 Infrastructure (health services facility) zone.

To enable this use an amendment to Schedule 1 – Additional Permitted Uses of the LEP is sought. There is no requirement to change the zoning maps to give effect to this proposed amendment.

The justification for seniors housing as part of the overall health hub proposal was provided in the February 2017 PP that supported by Council. It is simply the mechanism by which to enable the consideration of the use that has been updated in this proposal.

1.2 Initial consultation

In June 2014 initial consultation occurred with officers from Council and the Department of Planning and Environment (DP&E). The DP&E recommended that three amendment options be considered to amend the LEP to facilitate the proposed development.

These options were rezoning the site to an SP2 Infrastructure or Business Zone or using Schedule 1 - Additional Permitted Uses. Based on the outcomes of the discussions with both the Department and Council, it was concluded that an SP2 Infrastructure zoning would be the most suitable given the Department's position on Schedule 1 provided in the Draft Practice Note (Schedule 1 Additional Permitted Uses). Specifically, the Department highlighted that redeveloping the site using Schedule 1 would most likely result in unnecessary complications for future development proposals or modifications. Further, rezoning the site to a business zone could introduce incompatible land uses within the industrial area. For these reasons the proposal is based on the first option, rezoning to SP2 Infrastructure.

Following this, an initial version of this proposal was published on 17 June 2015 and submitted to Council.

A draft Council officer's report raised a number of matters to be addressed, including:

- justification for the proposal;
- appropriateness of the site;
- permissibility of an aged care facility if the site is rezoned ;
- amendments and/or further information required (including flood risk, land contamination, water quality, establishment of height, floor space ratio and minimum lot size controls); and
- preparation of the Employment Lands Strategy (ELS).

An updated PP was submitted to Council in October 2015. Following this, Council further advised that consideration of the PP would be deferred pending Council's consideration of the Employment Lands Strategy.

Further feedback from Councils officers dated 7th November 2016 and as an outcome of Council's adoption of the ELS (20 November 2016), required further matters to be addressed. These included:

- a requirement to address the ELS including investigating an alternate access to the site from Brewer Street;
- a requirement for an odour assessment;

- LEP provisions related to the height, FSR and minimum lot size;
- requirement for a DCP;
- further consultation with Pejar;
- clarification of requirements of Water NSW in relation to SEPP (Sydney Drinking Water Catchment) 2011; and
- the Draft Regional Growth Plan (Southern Tablelands).

This updated proposal addresses all of the issues raised by the Council officers to date. It is noted that Council have identified the need for an odour assessment, contaminated land assessment and flood assessment in addition to the information contained within this proposal. Further council have required an investigation of proposed changed access arrangements and a DCP.

It is envisaged that the requirement for a preliminary investigation into site contamination and flood assessment be agreed to as part of the Gateway determination.

An odour assessment should be a matter for consideration at development application stage, when full details of proposed uses and location within the precinct are known.

Further consideration of the requirements for a DCP would be identified and agreed to at gateway however a DCP can be prepared anytime after the approval of the rezoning and prior to lodgement of any proposed DA for the site.

1.2.1 Consultation June 2017

At its meeting 7 March 2017, Council resolved to forward the subject proposal to the DPE for a gateway determination.

Subsequent to this and prior to lodgement with DPE, Council officers have, after consultation with the DPE, advised that State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors Housing SEPP) does not apply to land within the Goulburn Mulwaree LGA.

Specifically, Seniors Housing SEPP Clause 4 “Land to which the policy applies” contains a sub clause (6), which states that the SEPP does not apply to land described in Schedule 1 of the SEPP as “Environmentally Sensitive Land”.

Schedule 1 of the Seniors Housing SEPP identifies land in another environmental planning instrument identified as a water catchment as not subject to the Policy. The Goulburn Mulwaree local government area is within the Sydney Drinking Water Catchment as identified in the SEPP (Sydney Drinking Water Catchment) 2011.

This has the effect of not allowing for the consideration of an aged care facility on the subject land. As the aged care facility is a key component of the overall proposal for the development of the health hub this planning proposal now seeks a minor modification to the Goulburn Mulwaree LEP to allow for seniors housing (see definition below)

seniors housing means a building or place that is:

- (a) a residential care facility, or

(b) a hostel within the meaning of clause 12 of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, or

(c) a group of self-contained dwellings, or

(d) a combination of any of the buildings or places referred to in paragraphs (a)–(c),

and that is, or is intended to be, used permanently for:

(e) seniors or people who have a disability, or

(f) people who live in the same household with seniors or people who have a disability, or

(g) staff employed to assist in the administration of the building or place or in the provision of services to persons living in the building or place,

but does not include a hospital.

This proposal specifically seeks a minor modification to the applicable planning instrument, the Goulburn Mulwaree LEP, to allow seniors housing in the SP2 Infrastructure (Health Services Facility) zone. To enable this use an amendment to Schedule 1 – Additional Permitted Uses of the LEP is sought. There is no requirement to change the zoning maps to give effect to this proposed amendment.

1.3 Background

1.3.1 Regional context

Goulburn is a regional city in the Southern Tablelands of New South Wales and is approximately 195 kilometres (km) south-west of Sydney and 90 km north-east of Canberra.

The site sits on the western side of an established industrial area to the south of Bradfordville and is approximately 3.5 km north-east of the Goulburn CBD. It adjoins the Wollondilly River to the south and the western property boundary runs along the alignment of the former Goulburn-Crookwell Railway (refer Figure 1.1).

1.3.2 The site and surrounds

The site is located on land described as Lots 100 and 101 DP 1214244 in Ross Street, Bradfordville, Goulburn. It has an area of approximately 12.45 ha, (excluding roads), separated into two portions by a 20 metre (m) wide road reserve from Brewer Street which is currently unformed. The land is relatively flat and drains towards the Wollondilly River to the south-west.

Vegetation within the site is limited, consisting of isolated single trees and introduced grass and weed species on the eastern side of the property where the approved development is to be located. The majority of vegetation is located on the western side of the site along the riparian land and the public 'Town Walk'. The site is now fenced and pasture improvements are in progress to eventually remove all weeds, blackberries and privets.

It is intended that the development will occur in three stages. Stage 1, comprising the medical centre and ancillary uses (pharmacy and cafe) is completed and operational. Stage 2 has approval, and Stage 3 will be described in detail in subsequent development applications (DAs). Stage 2 consists of the day surgery, radiology unit and specialist centre. Stage 3 will incorporate the hospital, oncology and research units, aged care facility and rehabilitation clinic. The commencement of the second stage should begin within the next two years.

While the timing of the third stage is unknown, in the interim, this part of the site will be landscaped in accordance with a Landscape Plan prepared by Michael Bligh and Associates Pty Ltd (refer Appendix B) resulting in substantial aesthetic improvements.

As Figure 1.2 shows, Stage 1 and proposed Stage 2 are situated to the east of the northern portion of the site. This area is approximately 1.93 ha and is bounded by Ross Street to the east, the northern property boundary and northern boundary of the unformed Brewer Street. A storage building sits directly adjacent to the site on the north-eastern corner. Stage 3 is bounded by residential property to the north along Taralga Road, the former Goulburn-Crookwell Railway to the west and the Wollondilly River to the south.

Opposite the site on the eastern side of Ross Street are storage facilities and an earthmoving and transport supply depot. Further to the south are several public parks.

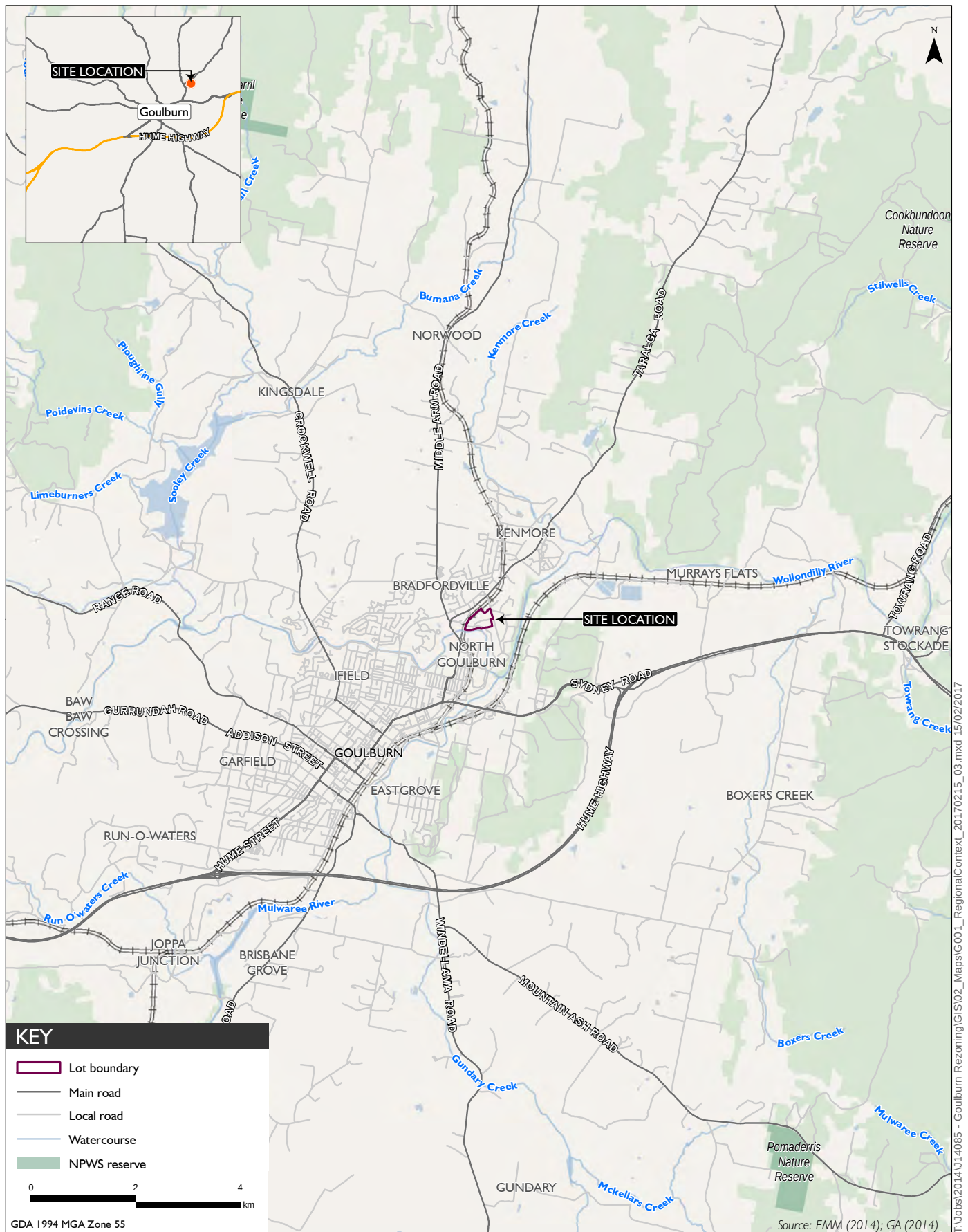
Vehicular access to the site is via Ross Street which is a sealed urban road in good condition. Ross Street links to Taralga Road which is a sealed urban road aligned in an east-west direction. These two roads provide the main access route to the site (see Figure 1.3).

The site is owned by the applicant, Cullingral Pty Ltd.

1.4 History of land use and zoning

1.4.1 Land use

The approved medical centre, cafe and pharmacy have been constructed and are operational. The remainder of the site is currently vacant and is being used for livestock agistment. The site was previously used as part of a golf course.

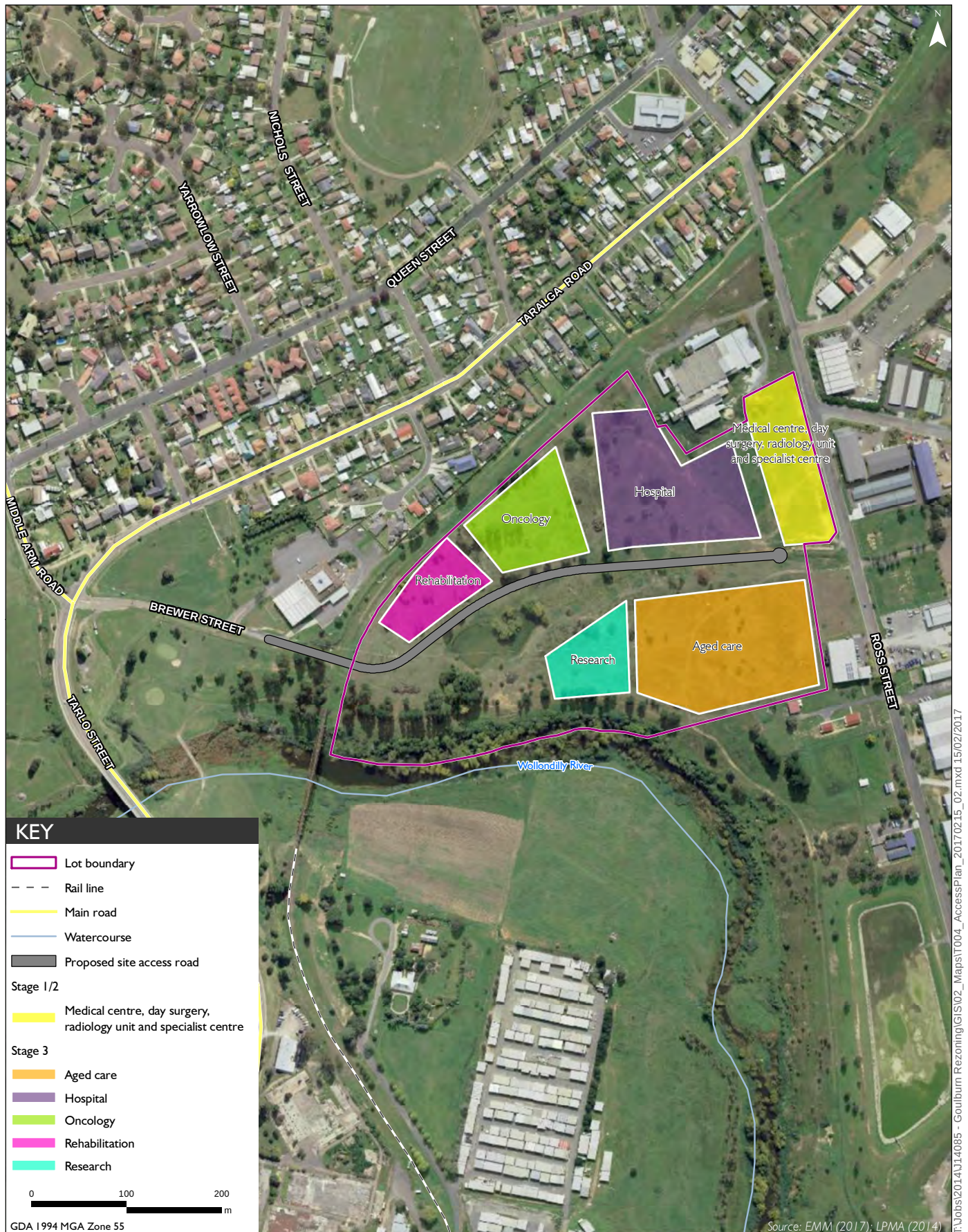


Regional context

Proposed Rezoning for the Goulburn Health Hub at 37 Ross Street

Planning Proposal

Figure I.1

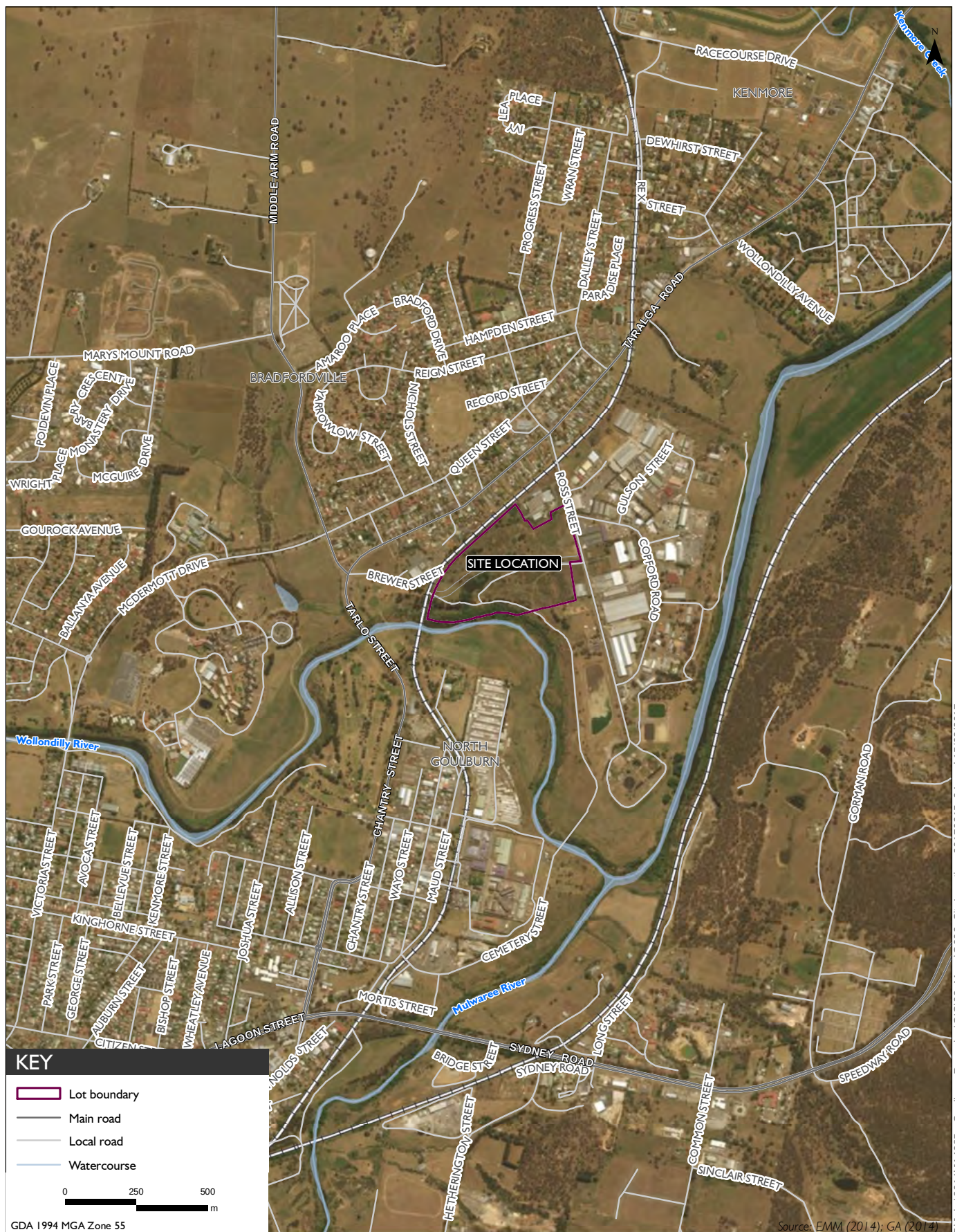


Concept plan

Proposed Rezoning for the Goulburn Health Hub at 37 Ross Street

Planning Proposal

Figure I.2



Site location

Proposed Rezoning for the Goulburn Health Hub at 37 Ross Street

Planning Proposal

Figure I.3

1.4.2 Approval history

Approval for a substantial development (the area of land shown in yellow on the Indicative Concept Plan – Figure 1.2) was recently granted by Council, as follows:

- (DA/0084/1213) - Council granted deferred commencement consent for the Goulburn Health Hub on 2 July 2013 subject to various conditions. The approved development was primarily a multi-faceted medical complex including a medical centre, consulting rooms, day surgery and child care centre.
- (MOD/0064/1314) - A deferred commencement consent for a Section 96 Modification to the above development was also granted by Council on 19 June 2014. The modifications to the approved development were:
 - removal of the childcare centre;
 - relocation of the day surgery;
 - addition of the Allied Health Facility (rehabilitation clinic) and dental services to the medical centre;
 - expansion of the pharmacy and cafeteria;
 - increasing the parking area;
 - staging of the development; and
 - other minor layout changes.

The modified development was approved in two stages. Stage 1 included the medical centre (including the Allied Health clinic and dental services), cafe and pharmacy. Stage 2 included the day surgery accompanied by the specialist and radiology treatment rooms.

Construction has yet to commence on Stage 2.

1.4.3 Current situation and future planning

Most of the site is currently zoned IN1 – General Industrial under the Goulburn Mulwaree LEP (see Figure 1.4). The objectives of the IN1 zone are:

- ‘to provide a wide range of industrial and warehouse land uses;
- to encourage employment opportunities;
- to minimise any adverse effect of industry on other landuses; and
- to support and protect industrial land for industrial uses.’

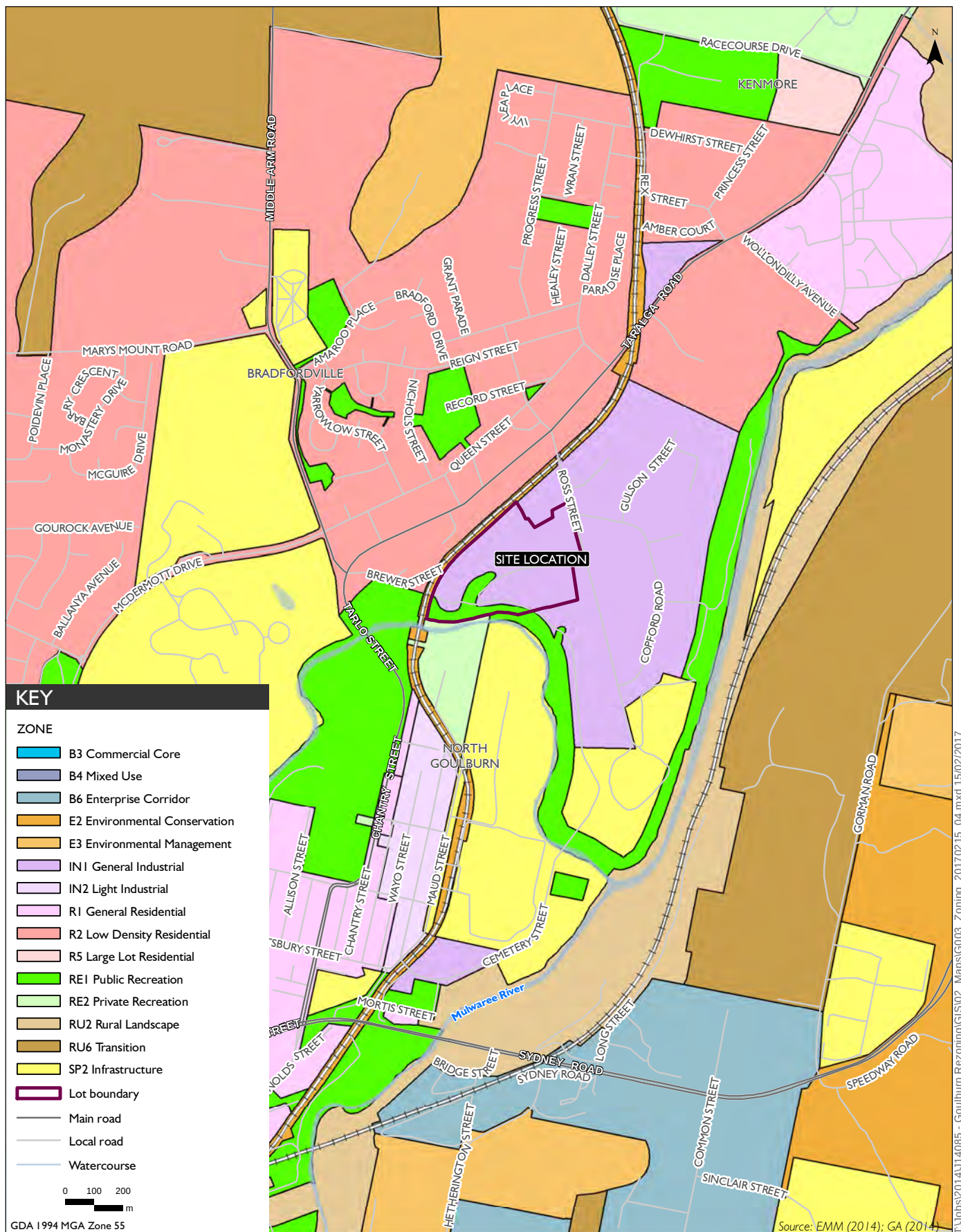
The current zoning does not permit the establishment of the hospital. It is proposed to rezone the land to SP2 Infrastructure to allow the use to be developed on the site. The proposed uses (including the medical centre and rehabilitation clinic) primarily fall within the definition of a '*medical centre*' which is a permitted use in the IN1 General Industrial Zone. The proposed hospital falls within the '*health services facility*' definition of the LEP. This use is prohibited within the IN1 Industrial Zone.

It is proposed to rezone the current Industrial zoned land to the SP2 Infrastructure Zone (Health Services Facility) and its objectives are as follows:

- 'To provide for infrastructure and related uses; and
- To prevent development that is not compatible with or that may detract from the provision of infrastructure.'

The land use restrictions imposed under the current zoning do not enable a pro-active response to the State Government's desire to increase the provision of health facilities in the region. Also, the site has remained vacant for several years and this highlights the lack of demand for industrial zoned land in the locality. The recently approved Goulburn-Mulwaree Employment Lands Strategy acknowledges and provides evidence to support a change to these restrictions and recommends this part of the Bradfordville Industrial Precinct be rezoned to SP2 Infrastructure (Health Services Facility).

A small part of the south western corner of the site is zoned RE1 Public Recreation. It will not change under the planning proposal (see Figure 1.4).



Goulburn LEP zoning

Proposed Rezoning for the Goulburn Health Hub at 35 Ross Street

Planning proposal

Figure 1.4

1.5 Balancing environmental and development values

The current IN1 Industrial zoning allows development of the land for industrial purposes. There is already an abundance of land zoned Industrial in the surrounding locality under the Goulburn LEP. The site has remained vacant for several years highlighting the lack of demand for industrial zoned land. This planning proposal presents an alternative based on an analysis of land use demands, environmental constraints and consideration of relevant planning instruments and policies.

The provision of medical facilities on this site has already been justified and approved under DA/1213/84. In summary, it was concluded by Council that the proposed medical facilities were generally in the public interest, not incompatible with the surrounding land uses and their ongoing operation would not adversely impact on the surrounding natural and built environments.

The development of the Goulburn Health Hub, with the inclusion of the hospital, aged care facility and rehabilitation clinic, will provide medical and health services to meet the future needs of the local and regional communities.

Further, no ecological or other significant environmental constraints have been identified during this assessment (refer Sections 5.6 to 5.12).

1.6 Demand for medical and health facilities

In July 2011, Infrastructure NSW was tasked with preparing a 20 year Strategy to assess the current state of infrastructure and identify strategic priorities – *‘The Strategy is independent advice to the Government on the specific infrastructure investments and reforms recommended to make NSW number one again’*. (www.infrastructure.nsw.gov.au/state-infrastructure-strategy.aspx).

The Strategy examined a broad range of sectors and identified specific projects and programs for priority consideration. It also made recommendations to the NSW Government on how to fund these recommendations.

Section 13.0 – *‘Health Infrastructure of the State Infrastructure Strategy’* is relevant to the provision of additional medical and health care facilities on the site.

The report explained that the NSW health system faces considerable challenges in meeting growing demands driven by an ageing population, lifestyle diseases and new care technologies. Further, demand for health care was forecast to grow by nearly 50 % in the next 20 years and it was noted that NSW has a smaller private health sector than Victoria and Queensland and NSW Health has a higher proportion of private patients in public hospitals than any other state – 16 % in NSW compared to 9% in Victoria and 5% in Queensland. In combination these factors discourage private investment.

This document states:

- ‘An ageing population – while population is forecast to grow by 30 percent by 2031, the forecast demand for health services may grow by 49 percent;
- Average health expenditures per person over 65 years of age is four times more than those under 65. The Productivity Commission projected ageing will account for about half the increase in health expenditure as a proportion of GDP;
- Increasing prevalence of lifestyle diseases such as obesity and diabetes;

- Increased use of high cost and advanced technologies with shorter capital cycles; and
- Community expectations for certain care models and ready access to service options. Health needs are increasingly related to lifestyle factors requiring the system to change from a focus on treating illness to more illness prevention and ultimately over time the maintenance of wellness.'

The Goulburn area has a growing and ageing population. According to the ABS, Census of Population and Housing 2006 and 2011, in 2011 the population of the district was 28,285 which represented an approximate 5.4% increase over the 2006-2011 census period compared to a 2.4% increase over the previous five year period (2001-2006). The age group between 70 and 85+ increased by 2% during the census period of 2006-2011. These are relatively high growth rates when compared to both regional NSW and the State as a whole. With a growing ageing population facilitates a greater demand for medical facilities such as those proposed.

The existing Goulburn Medical Clinic was established in 1946 and is the most longstanding medical practice in the area. Historically, it has been identified as one of the first multi-disciplinary practices of any size established in New South Wales. It is acknowledged that the clinic has a mixture of general practitioners and specialists that provide a range of healthcare facilities. However, it is considered that the proposed development will provide more modern technology and services that will better meet the current health needs of the local and wider community than existing medical and health care facilities in Goulburn.

Further discussion on the demand for medical and health facilities in the Goulburn area is provided in Chapter 4.

1.7 Concept Plan

1.7.1 Vision and principles of the concept plan

To achieve the objectives and outcomes set out in Section 2.1, an indicative concept plan which underpins the planning proposal has been produced (refer Figure 1.2). Artist Impressions have also been prepared for the medical facilities that form part of Stage 1/2 on the indicative concept plan. Specifically, these illustrate the conceptual design for the medical centre, day surgery and surrounding buildings (refer Appendix A).

As described in Section 1.2.2, it is intended that the development will occur in three stages, all of which will be described in detail in subsequent development applications (DAs). Stage 1 is in operation, and, comprises the medical centre and ancillary uses including a pharmacy and cafe. Stage 2 will consist of the day surgery, radiology unit and specialist centre. Stage 3 will incorporate the remainder of the proposal on the balance of the site including: a proposed private hospital, oncology and research units, an aged care facility and rehabilitation (mental and physical) clinic.

Access to the site has been shown via Brewer Street, in such a way as to minimise the impact of traffic on Ross Street and to provide a separation of the industrial precinct and medical precinct traffic.

Landscaping and open space will be a key element in the overall development of the site, adding to the amenity for the proposed range of uses. The landscaping will build on the key features of the site including a wetland in the south western corner. A Landscape Master Plan has been prepared by Michael Bligh and Associates Pty Ltd to outline the proposed landscape concept. (refer Appendix B). A Riparian Concept Plan (Appendix F), prepared by Wariapendi Nursery proposes the creation of a fully functioning and sustainable riparian zone consisting of indigenous plants.

2 Objectives and intended outcomes

2.1 Objectives and intended outcomes

The outcome sought by this planning proposal is to enable the development of land at 37 Ross Street for high quality medical and community health facilities.

The intended outcome is to provide a 24 hour hospital, medical centre, rehabilitation hospital (inclusive of mental and physical rehabilitation), aged care facility, research centre and oncology unit. Ancillary shops, such as a pharmacy and coffee shop, will also be provided.

To achieve this intended outcome, the objective of this amendment is to:

- rezone the subject land from IN1 - General Industry to SP2 – Infrastructure (Health Services Facility); and
- amend Schedule 1 – Additional Permitted Uses of the Goulburn Mulwaree LEP to allow seniors housing with consent.

The land which adjoins the Wollondilly River to the south of the site, which is contained within the RE1 Public Recreation zone, does not form part of this planning proposal. This land is also identified on Council's Flood Planning Map as a flood planning area. This part of the site has been excluded from the proposal to enable this land to be used for public open space or recreational purposes and to avoid potential interferences with the existing local flood behaviour.

It is a further objective of the proposal to ensure that development on the site does not impact on the amenity of neighbouring properties and the general locality. Therefore, it is proposed to amend the height of building, the floor space ratio and the minimum lot size layers in LEP 2009.

3 Explanation of proposed provisions

3.1 Proposed zoning

The proposed outcome will be achieved by:

- amending the Goulburn Mulwaree LEP 2009 Land Zoning Map at 37 Ross Street in accordance with the proposed zoning map see Appendix C; and
- amending “Schedule 1 – Additional Permitted Uses” of the Goulburn Mulwaree LEP, to enable seniors housing on the subject land.

The current zoning is shown at Figure 1.4.

The objectives of SP2 – Infrastructure zone are:

- to provide for infrastructure and related uses; and
- to prevent development that is not compatible with or that may detract from the provision of infrastructure.

Land uses permitted with consent in the SP2 – Infrastructure zone are those shown on the Land Zoning Map, in this case ‘Health Services Facility’ including any development that is ordinarily incidental or ancillary to development for that purpose. Any other use is prohibited.

3.1.1 Modification to Schedule 1

Restrictions under the proposed SP2 zoning do not enable an efficient use of the land that takes into consideration the potential for aged care facilities to be developed within the proposed health hub precinct. As an overall development concept the health hub and its proposed medical and support facilities are ideal to support seniors housing.

The location and accessibility of services and facilities is a key consideration for developing seniors housing and the health hub precinct will be able to provide these including:

- shops, bank services and other retail and commercial services residents may reasonably require;
- community and recreation services;
- the practice of a general medical practitioner; and
- suitable public or private transport options which can be developed.

This proposal seeks a minor modification to the Goulburn Mulwaree LEP, to allow seniors housing within the proposed SP2 – Infrastructure Zone (Health Services Facility). To enable this use an amendment to Schedule 1 – Additional Permitted Uses of the LEP is sought.

This amendment is sought in accordance with Part 2.5 in the LEP which states:

'2.5 Additional permitted uses for particular land

(1) Development on particular land that is described or referred to in Schedule 1 may be carried out:

(a) with development consent, or

(b) if the Schedule so provides—without development consent, in accordance with the conditions (if any) specified in that Schedule in relation to that development.

(2) This clause has effect despite anything to the contrary in the Land Use Table or other provision of this Plan.'

The proposed amendment to Schedule 1 is outlined below.

Amendment applies to	Explanation of provisions
Schedule 1 - Additional Permitted Uses	Use of certain land in Bradfordville in the SP2 Infrastructure Zone (Health Services Facility) (1) This clause applies to Lot 100 and 101, DP 1214244 in the SP2 Infrastructure Zone (Health Services Facility) at 37 Ross Street and 23 Brewer Street, Bradfordville (2) Development for the purposes of seniors housing is permitted with consent

3.2 Development standards

Development standards to manage the impact of development on the site will be achieved by amending the following LEP 2009 layers: height of building (HOB), lot size (MLS) and floor space ratio (FSR), (refer Appendix C).

3.2.1 Height of buildings

The height of a building on any land within the subject site is not to exceed the maximum height of 12 m. It is considered that this maximum height is in keeping with the objectives of the maximum height clause, as discussed below.

'(1) The objectives of this clause are as follows:

- (a) to ensure the height of buildings complements the streetscape or the rural character of the area in which the buildings are located,

A maximum building height of 12 m is in keeping with surrounding industrial development and will allow the development of a feasible health services facility of up to three storeys while ensuring the height of the building complements the character of the area, which is primarily industrial. A maximum building height of 12 m will complement the Ross Street streetscape, which has industrial buildings of a similar height from 1 to 3 storeys.

It is noted that the proposed upgrades to the Goulburn Base Hospital are likely to exceed 12 m in height. The existing hospital is over five storeys in height and the newly constructed rehabilitation unit (approved in 2012) included a variation to the 8 metre height limit to allow a more efficient use of the site.

Each of the buildings within the proposed development will be designed, landscaped and positioned so as to not dominate the skyline or streetscape. The proposal will therefore incorporate sufficient environmental planning grounds to support the 12 m height control.

- (b) to protect the heritage character and significance of buildings and avoid an adverse effect on the integrity of heritage items,

The site is not located in a heritage conservation area under the Goulburn Mulwaree LEP and the site itself has no historical significance.

State Heritage item 302 'Riversdale' is listed under the Goulburn LEP 2009 Schedule 5 – Environment heritage, Part 1 – Heritage Items. This item is a single storey Georgian dwelling house and situated some 660 m to the south of the site at 107 Wayo Street. It is not considered that a maximum building height of 12 m will detrimentally impact the integrity of this heritage item.

- (c) to ensure the height of buildings protects the amenity of neighbouring properties in terms of visual bulk, access to sunlight, privacy and views.'

Adjoining development to the north and east of the site is industrial in character and if anything, the proposed health services facility will enhance the amenity of the area. It is not considered that a maximum building height of 12 m will impact the amenity of adjoining properties with regard to visual bulk, access to sunlight, privacy and views. Although residential development is located to the north of the site, this residential area is separated from the site by the intervening disused railway corridor. Further, the indicative concept plan shows the hospital area in stage 3 will be setback from the boundary and landscaping would be provided in this set back to further reduce the visual impact. It is noted that while the proposal seeks a maximum height limit of 12, this will not be the maximum height of all buildings across the site, with a range of one to three storeys provided across the facility.

3.2.2 Floor space ratio

The floor space ratio of buildings on a site is the ratio of the gross floor area of all buildings within the site to the site area. Given this, and the proposed development of the site for a health services facility, it is proposed that the site has a maximum floor space ratio 0.7:1. It is considered that this floor space ratio is keeping with the objectives of the floor space ratio clause, as discussed below.

- (1) The objectives of this clause are as follows:
 - (a) to ensure the bulk and scale of development does not have an unacceptable impact on the streetscape and character of the area in which the development is located.

The site is located in an industrial area and it is considered that a floor space ratio of 0.7:1 is in keeping with the character of the area and will not result in an overdevelopment of the site.

- (2) The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map. The floor space ratio for the site is shown in the amended FSR layer, (refer to appendix C).

3.2.3 Minimum subdivision lot size

It is proposed that the minimum lot size for the subdivision of land within the site would be 1000m². It is considered that this minimum subdivision lot size is keeping with the objectives of the relevant clause.

1. The objectives of this clause are as follows:
 - a) to provide a minimum lot size for the subdivision of land.
2. This clause applies to a subdivision of any land shown on the Lot Size Map that requires development consent and that is carried out after the commencement of this Plan;
3. The size of any lot resulting from a subdivision of land to which this clause applies is not to be less than the minimum size shown on the Lot Size Map in relation to that land;
4. This clause does not apply in relation to the subdivision of individual lots in a strata plan or community title scheme:
 - a) This clause does not apply in relation to the subdivision of land for the purpose of erecting an attached dwelling or a semi-detached dwelling in a residential zone.

The amended MLS layer is included in Appendix C.

4 Justification

4.1 Need for the planning proposal

4.1.1 Is the planning proposal a result of any strategic study or report?

The Goulburn-Mulwaree Employment Lands Strategy supports the rezoning of the subject land to facilitate the development of the proposed health hub.

Specifically the ELS states that:

The development of a medical centre on Ross Street has led to a proposal to develop a health hub within this sub-precinct on a large lot. It is assumed that the proposal is in response to an underlying demand within Goulburn for health related services. Rezoning would be required to facilitate the intent to provide a private hospital.

The ELS concluded that the development of a Goulburn Health Hub has planning merit in both social and economic terms through co-location of a range of health services for the community, job creation and flow on effects to service industries.

The ELS takes into consideration any concerns that were raised in relation to the loss of industrial land (20% of the precinct), and the precedent a rezoning of this kind may have on the remainder of the Bradfordville Industrial Precinct.

Notwithstanding the loss of industrial land, on balance the ELS recommends a rezoning to SP2 Infrastructure be supported and progressed in the short term.. The reasons given include:

- a medical centre is permissible and already approved on the site;
- the Goulburn Mulwaree LGA like many others is moving towards a more serviced based economy, and coupled with an ageing population there is demand for increased health facilities. The nearest private hospitals are located in Bowral and Canberra;
- the potential for land use conflict is considered minimal as the site is located on the west of the Bradfordville Precinct and is adjacent to residential land which lies to the north west of the site as well as public and private recreation zoned land to the north west. It is considered that interface issues with the general industrial area can be adequately addressed (large building setbacks, landscaping etc.);
- there is opportunity to open up access to the subject site from Brewer Street which would minimise traffic on Ross Street; and
- the economic and social benefits are considerable and will provide employment opportunities as well as increased facilities for the community.

The proposal is also compatible with applicable regional plans as explained in Section 5.1.

4.1.2 Is the planning proposal the best means of achieving the objective or intended outcomes, or is there a better way?

As stated in Section 1.1 of this Planning Proposal, it is argued that the rezoning of land to SP2 Infrastructure and the modification to Schedule 1 to allow seniors housing is the best means of achieving the desired outcome. The proposal makes use of a site that has been zoned for industrial purposes but which has remained largely vacant for several years. It would thus promote 'orderly and economic use of land' (s5(a)(ii) of the EP&A Act). Also, the proposal would facilitate a greater and improved range of medical and community health facilities for the locality and wider region with minimal impacts on the environment.

4.2 Justification for the planning proposal

4.2.1 Goulburn health facilities requirements

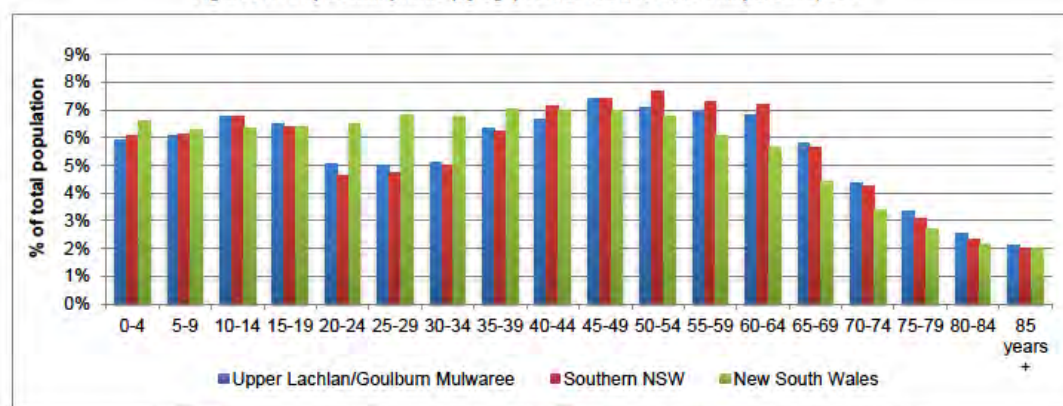
Additional health facilities will be required in Goulburn over the coming two decades. The primary reasons are:

1. Population Growth

The combined Goulburn Mulwaree and Upper Lachlan Shire population is projected to increase from 37,800 in 2011 to 38,750 in 2021 (8.2% increase), and to 41,000 in 2031 (14.8%).

2. Ageing Population

Figure 2.1: Population profile (by age) versus ML and state comparators, 2011



Source: Public Health Information Development Unit and Australian Bureau of Statistics (2012)

Goulburn features a significantly higher percentage of residents older than 45 years of age as compared to the NSW average. The difference is especially acute in the 55-64 age bracket.

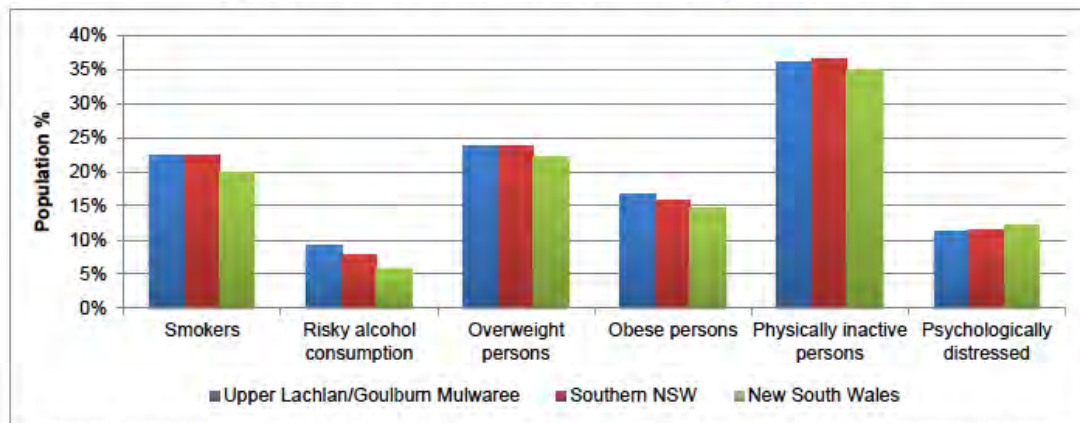
The average health expenditure per person over 65 years of age is four times more than for those under 65. An increased demand for surgical interventions and chronic and complex medical conditions can be anticipated. This will pose a significant burden on the current facilities.

5. Health Risk Profile

Our region has a troubling health risk profile. Some key comparators are:

- a) Prevalence of health risk factors in Upper Lachlan/Goulburn Mulwaree; and

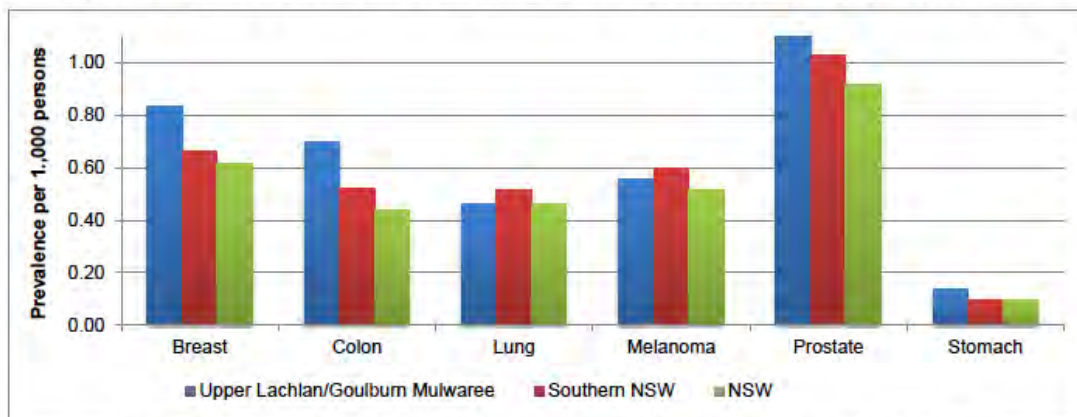
Figure 3.1: Health risk factors versus ML and state comparators, 2007-08



Source: Public Health Information Development Unit and Australian Bureau of Statistics 2007-08 National Health Survey

- b) Incidence of cancers;

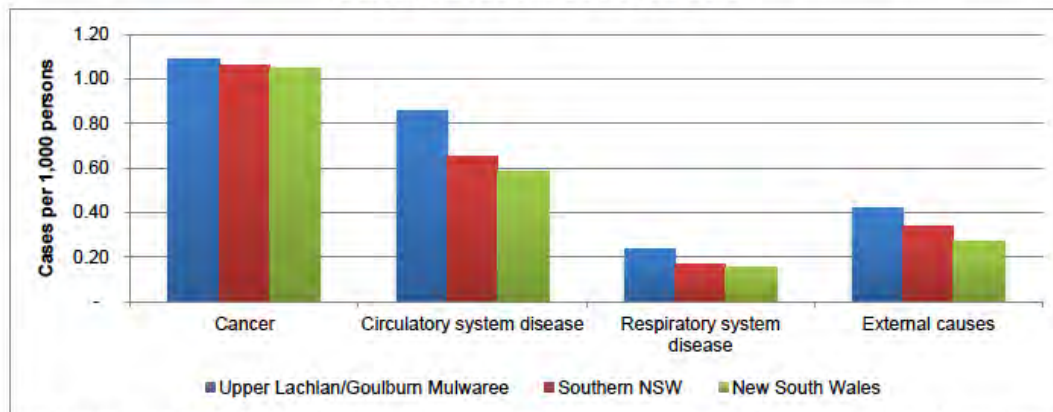
Figure 4.2: Incidence of selected cancers per 1,000 persons versus ML and state comparators, 2004 to 2008



Source: Cancer Institute NSW (2010); Note: Incidences reported are crude rates (not age-standardised)

- c) Rate of premature mortality from all chronic diseases; and

Figure 4.3: Premature mortality* from chronic disease (ages 0 to 74 years) and external causes per 1,000 persons versus ML and state comparators, 2003 to 2007



Source: Public Health Information and Development Unit and Australian Bureau of Statistics (2012). Note: * 'Premature mortality' is defined by PHIDU as mortality occurring prior to 75 years of age; 'Circulatory system conditions' include ICD-10-AM codes I00 to I99; 'Respiratory system diseases' include ICD-10-AM codes J00 to J99; 'External causes' include deaths arising from transport accidents, accidental falls, accidental poisoning, assault and suicide; Death rates reported are crude rates (not age-standardised).

- d) Our region has the highest suicide rate (0.15 cases per 1,000 persons) across the Local Health District (LHD) catchment. The rate is 30% higher than LHD averages and 40% higher than NSW average.

Summary

Clearly, this growing, ageing population with significant health risks will continue to be the main demand driver for health services, placing pressure on health services unless appropriate responsive models are developed.

4.2.2 Justification for a Medical Precinct

All round the world, medical precincts are becoming the future of the delivery of health. The Goulburn Health Hub allows private operators to plan and establish services on the same site and derive the benefits of shared infrastructure, workforce and ancillary services. The patients would also have a better experience because of co-located facilities.

Australia is also now starting to adopt the global trend of specialist medical facilities as opposed to multi-purpose hospitals. Each facility relates to a specific area e.g. dialysis, cancer treatment centres, cardiology diagnostics and sleep disorder therapy. These facilities are purpose built and operate more efficient delivery models. Efficiency is derived partially from the medical specialisation, use of cutting edge technology and the ability to attract specialist staff who wish to work in the given field.

Infrastructure NSW presentations and The Southern NSW LHD reports advocate further investigation and development of specialist medical facilities as alternatives for expanding existing hospitals. Such initiatives are expected to improve efficiencies in delivery to public patients, cut waiting times and reduce capital costs.

4.2.3 Justification for a Private Hospital

1. Flow Reversal

Currently, the only private hospitals within driving distance are in Bowral and Canberra (over 100km from Goulburn). It is estimated that about 17.4% of Goulburn Mulwaree/ Upper Lachlan total separations (hospital procedures) flowed out of Goulburn for Private care. Flows to private NSW hospitals accounted for 19% of demand within the Local Health District (LHD) with the top Service related Groups being Orthopaedics, Diagnostic GI Endoscopy, Ophthalmology, Rehabilitation and Urology. Additionally, in 2010/11 about 6,500 separations flowed from our LHD to ACT private hospitals.

A level of flow reversal is possible for a proportion of the current non-tertiary flows from the Goulburn region, Yass Valley and Braidwood. The estimated size of the catchment including Yass Valley and Palerang shires is around 40,000 in 2011. Approximately 40% of Yass Valley LGA separations are currently flowing to the ACT each year, a proportion of which could be serviced from Goulburn. The achievement of substantial and sustainable reversal of historical patient flows and referral patterns requires the development of facilities that will attract workforce and patients.

The convenience of accessing a modern health facility right in one's town will likely be well received and appreciated by the community.

2. Benefits to Base Hospital

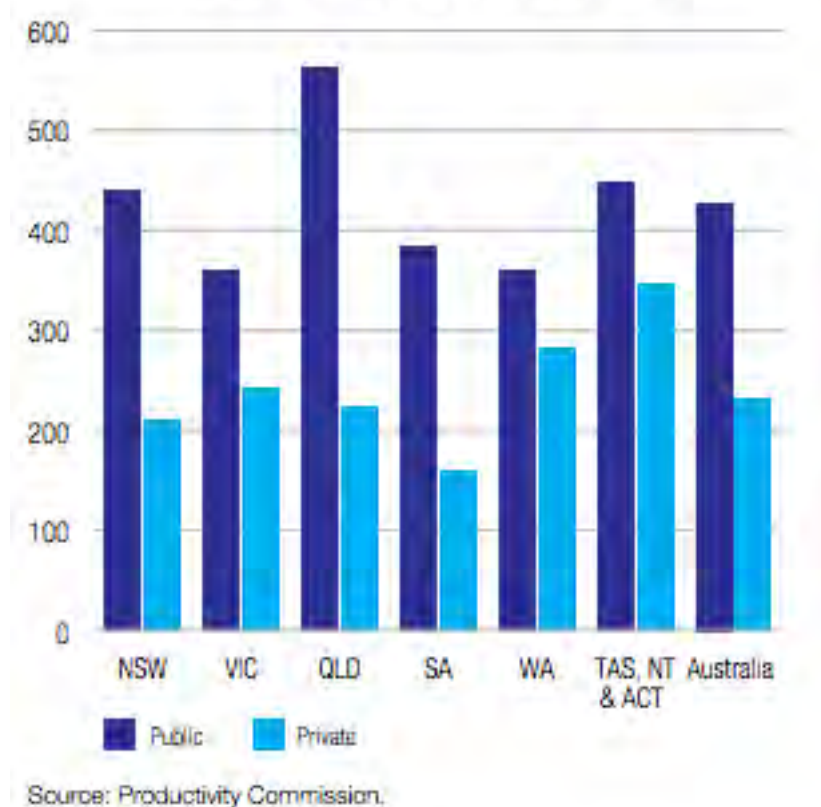
Some of Goulburn Base Hospital figures are below:

Procedure	Self Sufficiency Rate	Waiting Times (days)	NSW Avg Wait times (days)
Orthopaedics	71%	264	76
Ophthalmology	58%	337	82
General Surgery	52%	44	29
Urology	52%	41	13

The public health system is clearly under strain and private providers could help offload some of it in a mutually beneficial scenario.

At the end of 2014, Goulburn Base Hospital had 15 Visiting Medical Officers and no Local Medical Officers. The presence of a private hospital would attract specialists and surgeons who could work both privately and at the Base Hospital.

Figure13.5 Cost per casemix-adjusted separation by Jurisdiction and Sector, 2007-08



The above comparisons of private and public hospital activity between states are telling. They indicate the presence of multiple opportunities for lowering costs by increasing the private sector's proportion of supply of public health services in NSW. A stated goal of Health Infrastructure over the short term is to develop partnerships with the private sector to improve efficiencies in delivery to public patients and cut waiting times. The Goulburn Health Hub would be well positioned for such a development.

The Base Hospital would clearly gain by having a private hospital operate within the town. Less use of public hospital beds by private patients would provide additional hospital beds for public care, reducing waiting times and reduce the need for new capital expenditure.

4.2.4 Justification for Oncology Unit

The Cancer Institute NSW predicts that the incidence of cancer will increase overall in NSW by 44% between 2007 and 2021; the major reason for the rise in incidence is due to increasing population. Southern NSW LHD is predicted to have a 70% increase in cancer diagnosis by 2021 and cancer deaths in SNSW LHD are expected to increase by 33%, mainly due to the increase in the number of patients aged 65 or older. It is vital, therefore that access to cancer treatment and associated services are planned accordingly.

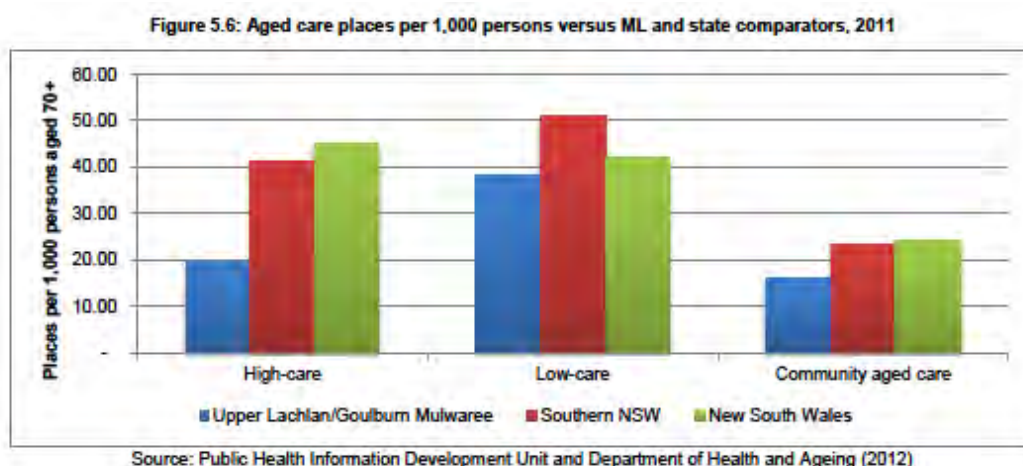
Currently, we rely heavily on specialists from the ACT for clinical leadership, for example cancer and renal services. Most types of outpatient chemotherapy can be administered locally, however inpatient chemotherapy is not administered within the Southern NSW LHD hospitals and patients requiring such treatment travel to either Canberra or Sydney. All patients who require radiotherapy are required to travel either to Canberra, Wollongong, Nowra or to Sydney.

The Goulburn Health Hub oncology unit will look to provide these treatments so that locals from Goulburn and our LHD can access treatment closer to home.

4.2.5 Justification for aged care (seniors housing)

The Southern NSW Medicare Local Population Study found that there are a high proportion of residents in all age groups requiring assistance with core activities in our region. Core activities are defined as needing help in one or more of the three activity areas of self-care, mobility and communication.

The Upper Lachlan/Goulburn Mulwaree region has six residential aged care homes providing a total of 123 high care places and 240 low care places. From the diagram below, our region appears to be under serviced in terms of aged care places, with the number of high, low and community aged care places per 1,000 persons aged 70+ being less than the number across the LHD catchment area overall.



With a higher percentage of older residents, assistance required for aged persons must be taken into consideration for planning to ensure appropriate access to aged care, allied health and rehabilitation services.

Notwithstanding the above, there is site specific merit to having a seniors housing development on part of the subject land. This includes the following:

- the land is largely level and appropriate gradients to enable access within and from the site will be provided;
- the proposal includes landscaped public open space forming a high quality and accessible public recreation area;
- there is an existing medical practice, pharmacy and cafe;

- a private hospital and associated rehabilitation and other health service will be located within the precinct;
- it is envisaged that any future operator will facilitate the evening use of seminar rooms by community groups;
- while a bank service provider will not be on site, ATM(s) will; and
- a transport service can be provided to the residents (e.g a minibus). In addition the current public bus service runs along Taralga road and could be extended to include a bus stop within the subject site. Refer to traffic assessment in Section 5.10.

The location and accessibility of services and facilities is a critical component of developing seniors housing. The proposal will ensure that residents will have suitable access to:

- shops, bank service providers and other retail services that residents may reasonably require;
- community and recreation facilities;
- the practice of a general medical practitioner.

Suitable access to these services will be within 400m of the proposed seniors housing development. The existing regular scheduled public bus services operating in the Bradfordville area (via routes 821A and 821B) provide the primary public transport connections in the locality. Subject to negotiation with the bus operator, some or all of the bus services along these routes will be extended to also travel via the section of Ross Street adjacent to the site, as this would reduce walking distances for persons travelling by public transport.

4.2.6 Justification for Rehabilitation

Demand for rehabilitation services will grow. Due to advancements in cancer care, patients will live longer, and sometimes experience multiple episodes of cancer during their lifespan. This, alongside the growth in an elderly population will see more people with dementia accessing rehabilitation services. Projections show a need for sub-acute rehabilitation centres around the District. While Goulburn Base hospital has recently built a 20 bed sub-acute ward, projections still indicate the need for more beds in the region. It is suggested by NSW Health Infrastructure that 20 rehabilitation beds, 4 palliative care and 10 GEM beds be planned for the future. Clearly, the public expenditure capability is limited and the possibility to offer these beds privately should be explored.

4.2.7 Employment

An analysis of employment within Goulburn reveals that the top employment industry sector is Health Care and Social Assistance (13.8%) as compared to NSW (11.6%). Many of these workers would be exiting Goulburn to carry out their jobs. The proposed health services facility would give local residents the opportunity to work locally as well as providing an opportunity to attract skilled practitioners from other regions, which in turn would provide a beneficial impact on the local economy.

Table 4.1 **Indicative number of employees at the proposed health services facility**

Facility	Staff numbers
Medical centre	38
Day surgery	30
Private hospital	30-50
Physical rehabilitation unit	30-40
Mental rehabilitation unit	30-40
Aged care facility	40-50
Oncology unit	25- 37
Research centre	25- 37
TOTAL	248-328

It is anticipated that the proposed facility would employ between 208 and 268 full-time staff, as shown in Table 4.1. Based on these figures, it is clear that the proposal has the potential to provide a significant amount of employment within the Goulburn area. There is also potential for further job creation in businesses servicing the hospital ie laundry, cleaning and catering services. There is opportunity for these service industries to be located within the Bradfordville industrial estate.

If the industrial zoned site were to be subdivided into five lots (as planned back in 2012) and became fully occupied, an optimistic assumption would be that each lot employed an average of 10 people. Therefore, assuming the site was fully occupied the site would create 50 jobs. This is significantly less than the employment numbers generated by the current proposal. It should be noted that the owner has not received any interest from industrial business operators over the past 5 years to develop the site.

4.2.8 Loss of industrial land

A valuer's assessment of the demand for industrial zoned land in Goulburn was prepared in August 2015 (refer Appendix D). This report identifies that due to a demand for industrial land in 1999, numerous areas were rezoned for commercial or industrial purposes in the following years, with approximately 100 ha of land made available for this type of development.

After 2005, demand declined due to rising interest rates and fuel prices and then the global financial crisis (GFC). This resulted in the failure of a number of industrial/commercial subdivisions, including land at 37 Ross Street (12.45 ha). Further to the above, an employment land demand forecast for industrial land was undertaken as part of the ELS. The ELS concluded that using the results of the land audit it is estimated that approximately 2,267ha of vacant industrial land exists within the industrial precincts in the LGA. This is more than sufficient to accommodate the projected growth in associated employment.

The ELS concludes that, the loss of industrial land in Bradfordville will not have a significant effect on the future supply of employment land as there is enough available land elsewhere in the LGA and within the Bradfordville Industrial Precinct.

Table 4.2 Recorded sales of vacant industrial/commercial sites over 2,000m²

Year	2,000m ² +	1-5 ha	Total
2008	0	0	0
2009	1 (3,158m ²)	0	1
2010	0	1 (1.3 ha)	1
2011	0	4 (14.9 ha)	4
2012	2 (8,076m ²)	0	2
2013	5 (1.6 ha)	0	5
2014	1 (2,150 m ²)	2 (3.5 ha)	3
2015 (to date)	1 (4,890m ²)	0	1
TOTAL	10 (3.42 ha)	7 (19.7 ha)	17 (23.1 ha)

Source: Goulburn Industrial Market - valuer's report, Douglas Walker and Associates, 28 August 2015.

Figures shown in Table 4.2, relating to the recorded sales of vacant industrial/commercial sites over 2,000 m², indicate that only 3.06 ha per annum of vacant commercial/industrial land has been sold in the last 7.5 years. It is also noted that the Bradfordville industrial area has become less favoured due to its distance from the Hume Highway, compared to other industrial areas, such as Tait Crescent, which is in closer proximity to Goulburn's southern interchange with the Hume Highway.

Further evidence of the over-supply of industrial land, particularly in the Bradfordville industrial area, was provided by the land owner directly opposite the site who has been attempting to sell land on the site for over five years, with no expressions of interest received to date. The owner's of the subject site have also not received any offers in the last five years.

The site for the proposed health services facility accounts for approximately 4 % of general industrial land within Goulburn and approximately 20 % of industrial land in the Bradfordville Industrial Precinct. Despite this, it is evident that the resulting loss of industrial land due to the proposal would not have a significant impact on the supply of industrial land within the local and wider regional context.

4.2.9 Potential for land use conflict

The proposed health services facility is located on the edge of the Bradfordville industrial estate, which is used for a range of light and general industry including glaziers, hydraulic and plant repairs, timber supplies, agricultural machinery sales and servicing, softdrink supplier, storage, concrete suppliers and and yurt (round wooden house) manufacturers.

Within the IN1 zone, general industrial uses including; freight transport facilities, sawmill or log processing works, warehouse or distribution centres and landscaping material supplies are permissible with consent. Despite this, it is far more likely that such an industrial use would result in a significant land use conflict in relation to the site, as it is located in close proximity to residential properties to the northwest ie a minimum of approximately 20 metres at the closest point. While located within the Bradfordville industrial estate, it is important to note that the site itself is located on the western edge of the estate and, as shown in Figure 1.4, is adjoined by public and private recreation zoned land to the west and south, environmental conservation and residential zoned land to the northwest and general industrial land to the east. Significantly, there is a large area of land zoned SP2 Infrastructure located directly to the south (used by NSW Correctional Services) and west of the Bradfordville industrial estate. If it was considered that the permissible uses within the general industrial and SP2 Infrastructure zones were incompatible, then the application of these zonings in this location would never have occurred.

The proposed rezoning of the site to SP2 Infrastructure (see Figure 3.1) is not inconsistent with the mix of zonings within the surrounding area and it can be argued that it is more appropriate zone in the context of adjacent residential development than a general industrial zone. The proposal provides a transition between the more sensitive uses to the north, west and south and industrial land to the east.

In relation to the potential for land use conflicts between the proposal and surrounding industrial uses in terms of noise, odour and truck movements the interface between the site and general industrial zone is limited to the northeast corner, the eastern portion of the site fronting Ross Street and the south east corner of the site.

Industrial land to the northeast is developed with a self-storage facility that would have minimal amenity implications for the proposal. The portion of the site fronting Ross Street has already been granted approval for a multi-faceted medical complex. The proposal identifies that this portion of the site (known as Stage 1) will be used as a medical centre, day surgery, radiology unit and specialist centre and these uses do not differ significantly from those already approved in this location. Land directly opposite Stage 1 is developed with a glass factory and given the industrial nature of its operations would unlikely to be adversely affected if the proposal were to proceed.

The south east portion of the site that has an interface with the general industrial zone is proposed to be used as an aged care facility. The ELS, in recommending support for the rezoning, noted that any interface issues between 37 Ross Street and the industrial land can be dealt with through controls such as large setbacks and landscaping, This can be included in the requirements of a future DCP for the precinct.

Currently, land to the south, at 37 Ross Street, is undeveloped apart from a shed in the south east corner. As stated in section 4.2.7, this land has been for sale for over five years, with no offers made. Notwithstanding this, the proposal provides for significant building setbacks from these boundaries and the landscape masterplan (refer Appendix B) identifies screening using native trees to all interfaces with industrial zoned land other than the Ross Street interface and a small section of land in the south east corner.

A noise impact assessment (refer Appendix I) was undertaken for this planning proposal and it concludes that with the implementation of the recommendations in this report, noise levels within the site from external sources will be within desirable 37dB L_{Aeq} internal goal recommended by relevant Australian standards. In addition, the traffic impact assessment (refer Appendix I) identified that even with the traffic generated by the proposal, indicators of traffic impacts, such as degree of saturation at intersections would not change significantly as traffic volumes are not large to start with. This demonstrates that amenity impacts on the proposed health services facility from traffic, particularly trucks, are unlikely to be significant.

It is considered that the proposed health services is sufficiently remote from general industry that it will not be adversely impacted by noise, odour or truck movements generated within the Bradfordville industrial estate. Specifically in relation to the Sewerage Treatment Plant at the southern end of Ross Street, there have been no reported issues relating to odour emissions from the facility. Further, given the zoning of nearby land, it appears that the SP2 Infrastructure and general industrial are appropriate zones to have next to each other. An odour assessment would be required as part of any future development assessment for the site.

4.2.10 Conclusion

The NSW Government is delivering a prioritised capital program to establish pro-actively planned "health care precincts". These precincts will have easy access to related private and public health services delivered by both government and non-government providers. In essence, this proposal to build a health precinct at Bradfordville establishes health services on the same site to derive benefits of shared infrastructure, shared workforce and ancillary services. This is recognised and supported by the recently adopted Employment Lands Strategy which recommends the rezoning of this land for the proposed health hub.

5 Relationship to strategic planning framework

5.1 Regional plans

5.1.1 Regional Growth Plan (South East Tablelands)

The locality of Goulburn Mulwaree falls within the DP&E's Regional Growth Plan for the South East and Tablelands (the Regional Plan). The regional plan was placed on public exhibition from 23 May to 23 August 2016 and submissions are now being considered.

The draft Plan outlined four (4) main goals for the region including:

- sustainably manage opportunities for new homes and jobs arising from the relationship with the ACT;
- protect and enhance the regions natural environment;
- strengthen the economic opportunities of the region; and
- build communities that are strong, healthy and well connected.

Of most relevance to this planning proposal is Goal 4, direction 4.2.

The draft Regional Plan states that delivering health and education facilities that meet the needs of the South East and Tableland's growing and changing population, will be integral to maintaining the region's standard of living. Demand for the region's health facilities is expected to increase due to the ageing population, overall population growth and the substantial seasonal influx of tourists. The rural and isolated nature of part of the region is a consideration for delivering health facilities. Health services in the region are delivered with a reliance on Canberra Hospital – the principal referral hospital in the region. The ACT and NSW Governments recognise the importance of closer working relationships between health systems in the region and are committed to developing an action plan to improve crossborder health service coordination.

Action 4.2.1 outlines specifically how the State Government proposes to achieve this goal.

ACTION 4.2.1 Identify capacity and provide flexibility for investment to upgrade and deliver health services to the community

The NSW Government is looking at both short and long term plans for the redevelopment of its health campuses across the South East and Tablelands. The new South East Regional Hospital at Bega recently opened. Initial planning is under way for the Goulburn, Cooma, Yass and Braidwood Health Services. A master planning exercise is also being undertaken at the Moruya Campus. The NSW Government will:

- identify the capacity for growth of the region's hospitals, and consider opportunities for future expansion; and
- put in place planning controls that facilitate the growth of complementary health uses around the region's hospitals.

The planning proposal provides an opportunity to help deliver Action 4.2.1 of the Regional Plan. The planning proposal will allow the provision of high quality medical and health facilities to support Goulburn's regional role. The rezoning will facilitate the growth of complementary health uses in Goulburn to take the pressure off the burdened public hospital. The proposed facilities will assist in caring for the needs of the ageing and growing population and provide employment opportunities in the locality.

5.1.2 Sydney-Canberra Corridor Regional Strategy

The Sydney-Canberra Corridor Regional Strategy represents an agreed NSW Government position on the future of the Sydney-Canberra Corridor. Its primary purpose is to accommodate and manage growth while ensuring that the rural landscapes and environmental settings that define the Region's character are not compromised. It does this by ensuring that land is available and appropriately located to sustainably accommodate the projected population growth and associated housing, employment and environmental needs over the period until 2031.

The document specifically states that *'Some communities (within the Region) that have historically been service centres supporting growing populations (e.g. Goulburn) have seen a slowing in growth and the population, as in many regions, is increasingly ageing.'* The document further states that *'Goulburn, Australia's first inland city plays an important role as the regional service centre for the central part of the Region.'*

Goulburn is identified as being the administrative and commercial centre of this central part of the Region. The Sydney-Canberra Corridor Regional Strategy Map states that *'the provision of services and housing in the central part of the Region should be generally consolidated in Goulburn to support its regional role.'*

The planning proposal will allow the provision of high quality medical and health facilities to support Goulburn's regional role. The proposed facilities will assist in caring for the needs of the ageing and growing population and provide employment opportunities in the locality. In this regard, it is considered that the proposal accords with the relevant aims of the Sydney-Canberra Corridor Regional Strategy.

Once finalised, the South East and Tablelands Regional Plan will replace the Sydney-Canberra Corridor Regional Strategy.

5.2 Consistency with State Environmental Planning Policies

Is the planning proposal consistent with applicable State Environmental Planning Policies?

i State Environmental Planning Policy No.55 – Remediation of Land

The aim of this policy is to provide the framework and requirements for the remediation and management of contaminated land. The site is listed as a suspected contaminated site on Goulburn Council's internal register of Contaminated Lands.

Stage 1 of the development was investigated for contamination by environmental consultants ZOIC Environmental Pty Ltd (Zoic) in 2013. These reports were prepared in relation to DA/0084/1213 (refer Section 1.3.2 of this planning proposal).

The site specific contamination and remediation reports prepared by Zoic have been reviewed and an assessment of site contamination is provided. The contamination reports are:

- Zoic 2013a Targeted Stage 2 Environmental Site Assessment Report for the Goulburn Health Hub Redevelopment, Part Lots 100 and 101, DP 1214244, 37 Ross Street Goulburn NSW (May 2013); and
- Zoic 2013b Delineation and Remediation Options Assessment – Goulburn Health Hub Redevelopment, 37 Ross Street Goulburn NSW (October 2013).

The review of site contamination reports by EMM has been undertaken in accordance with the State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55).

a. Targeted Stage 2 Environmental Site Assessment

A desktop Stage 1 contamination investigation (also undertaken by Zoic in May 2013) indicated that a portion of the study area (shown as Stage 1 on Figure 5.1) on the northern boundary was originally part of an industrial complex, and that the adjoining site has historically been used as a tannery or wool cleansing facility. Historic sampling events have confirmed the presence of pesticides and heavy metals in shallow soil near the northern property boundary.

An initial site investigation comprising the drilling and sampling of 18 boreholes was undertaken in May 2013.

The investigations showed that the subsurface comprised shallow uniform, dry, grey silty clay with small gravelly fill to approximately 0.2m below ground level. Underlying the silty clay was natural dry to moist, yellow and red mottled clay with minor silt or sand. Small ironstones and gravels were observed in a majority of the boreholes in the clay and fill respectively. During drilling no seepage or groundwater was recorded. Brick rubble amongst dark brown silty sand to a depth of approximately 0.8m was observed in boreholes BH1 and BH2. At BH4 ash-like fill material containing fragments of glass, wood, scrap leather, metal and wire was observed to a depth of 1m below ground level and it was speculated that a former incineration pit may have been located in this area.

Nineteen soil samples were submitted for laboratory analysis, comprising shallow (0-0.2 m) soil samples from each investigation location, and one deeper soil sample (0.5 m) from location BH4 where ashy fill material was encountered. The analytical suite included: heavy metals and organochlorine and organophosphate pesticides (OCP and OPP) at all locations and polycyclic aromatic hydrocarbons (PAH) at two locations. Asbestos analysis was also performed on eight primary samples and one duplicate sample, despite no visual indicators of asbestos containing material (ACM) during this initial investigation. Two quality control (QC) samples were also collected, comprising blind duplicate samples from two locations.

Due to the investigation being completed prior to official endorsement of the revised NEPM guidelines by the NSW EPA, the initial investigation results were assessed with respect to the soil investigation levels in Appendix II of the NSW DEC (2006) Guidelines for the NSW Site Auditor Scheme (2nd Edition). The adopted site assessment criteria included health based investigation levels (HILs) for low density residential land use (HIL-A), which are the recommended criteria where the land use includes a child care facility and commercial / industrial use (HIL-F), as well as the provisional phytotoxicity-based investigation levels (PIL) to assess potential ecological impacts.

The noteworthy laboratory results from the soil sampling included:

- the OCPs dieldrin, endrin and DDE were reported above the laboratory limit of reporting (LOR) in the shallow samples from BH1, BH2 and BH17. The dieldrin concentration at BH1 (47 mg/kg) exceeded HIL-A criterion (sensitive land use, 10 mg/kg), but was below the HIL-F criterion (industrial land use, 50 mg/kg). Dieldrin is an insecticide and by-product of the pesticide aldrin, it is persistent and bioaccumulates;
- the following exceedances of health-based heavy metal criteria were also reported:
 - copper, lead and nickel concentrations at BH4 (0.5 m), found in the ashy fill material, exceeded the HIL-A criteria, and the copper result also exceeded the HIL-F criterion. Arsenic, mercury and zinc results at BH4 also exceeded the more conservative PIL criteria; and
 - copper results at BH5 exceeded the PIL criteria.
- total PAHs and benzo(a)pyrene concentrations were reported above the laboratory LOR but were below the site assessment criteria at BH4 (0.5 m), ie within the ashy fill material; and
- the relevant percentage difference between the primary and blind duplicate samples indicated that the laboratory results were within the acceptable limits.

The laboratory results confirmed that the majority of the investigation locations sampled were below the adopted human health and environmental criteria for the proposed land use, with the exception of some exceedances close to the northern site boundary. The sampling results confirmed the presence of dieldrin in Lot 2 (refer Stage 2 Contamination Investigation Plan – Figure 5.1 below), an area previously identified as being impacted with pesticides. It is considered that the land adjoining the site to the north (former tannery / wool cleansing operations) is the source of pesticide contamination via either historical surface spraying along the boundary or via surface water runoff. In the north west of the site, at BH4, elevated heavy metal results appear to be isolated to the ashy fill, which is suspected to comprise incineration wastes.



Figure 5.1 Stage 2 contamination investigation plan

b. Delineation and remediation options assessment

In August 2013 Zoic undertook targeted ‘step out’ sampling in the vicinity of BH1 and BH4 to quantify the lateral extent of potentially contaminated soil, estimate the volume of impacted soil, and provide remedial options and cost estimates to render the site suitable for the proposed development.

Six near surface soil samples were collected 5-10m to the north, east and south of BH1 and six soil samples from test pits were collected along the fence line of Lot 9, to the west of BH1 (refer Delineation Sample Locations – Figure 5.2). The samples were submitted for OCP analysis; a fragment of suspected ACM adjacent to BH1 was also submitted for asbestos analysis. Five samples from testpits and surface scrapes to the east and south of BH4 were submitted for heavy metal analysis and two samples were submitted for waste classification, which included toxicity characteristic leaching procedure (TCLP) testing. The assessment criteria for this investigation referenced the National Environment Protection (assessment of site contamination) Measures (2013), as the revised NEPM had been officially endorsed by the NSW EPA by the time this supplementary investigation was performed. The PIL (plant phytotoxicity) guideline was omitted from the assessment criteria.

The laboratory results indicated concentrations of aldrin and dieldrin above the laboratory LOR at six locations; the reported concentrations at BH1K and BH1B, to the south east of BH1, exceeded the HIL-D criteria (the commercial / industrial land use criteria in the revised NEPM), and the reported concentrations at BH1C and BH1D exceeded the HIL-A criteria. Pesticide contamination was reported to be confined to the upper 0.2 m of the soil profile at the northern property boundary (Lot 2), and the volume of OCP-impacted soil was estimated at 15 m³. OCPs are the subject of a Chemical Control Order under the *Environmentally Hazardous Chemicals Act 1985*, which states that waste material containing greater than 2 mg/kg of total OCPs is considered a Scheduled Chemical Waste. In addition, the fragment of suspected ACM collected adjacent to BH1A was confirmed to contain asbestos.

Laboratory assessment of the heavy metal results around BH4 indicated all concentrations were below the HIL-D criteria; however two lead concentrations (BH4A and BH4C) and one nickel concentration (BH4A) exceeded the HIL-A criteria. Heavy metal impact at Lot 1 was considered to be limited to the ashy fill material, with an estimated volume of 100 m³ (or approximately 180 tonnes) exceeding the HIL-A criteria.

The 'step out' results indicated that Lot 1 is suitable for commercial/industrial land use, but not for more sensitive land uses such as a childcare centre unless the fill is remediated and/or managed. Soils are also considered to be an unsuitable growing medium for landscaping. Part of Lot 2 does not meet the commercial/industrial and childcare land use criteria unless the dieldrin impacted soil is remediated and/or managed. Visible fragments of ACM in surface soils also need to be removed to facilitate the future land use.

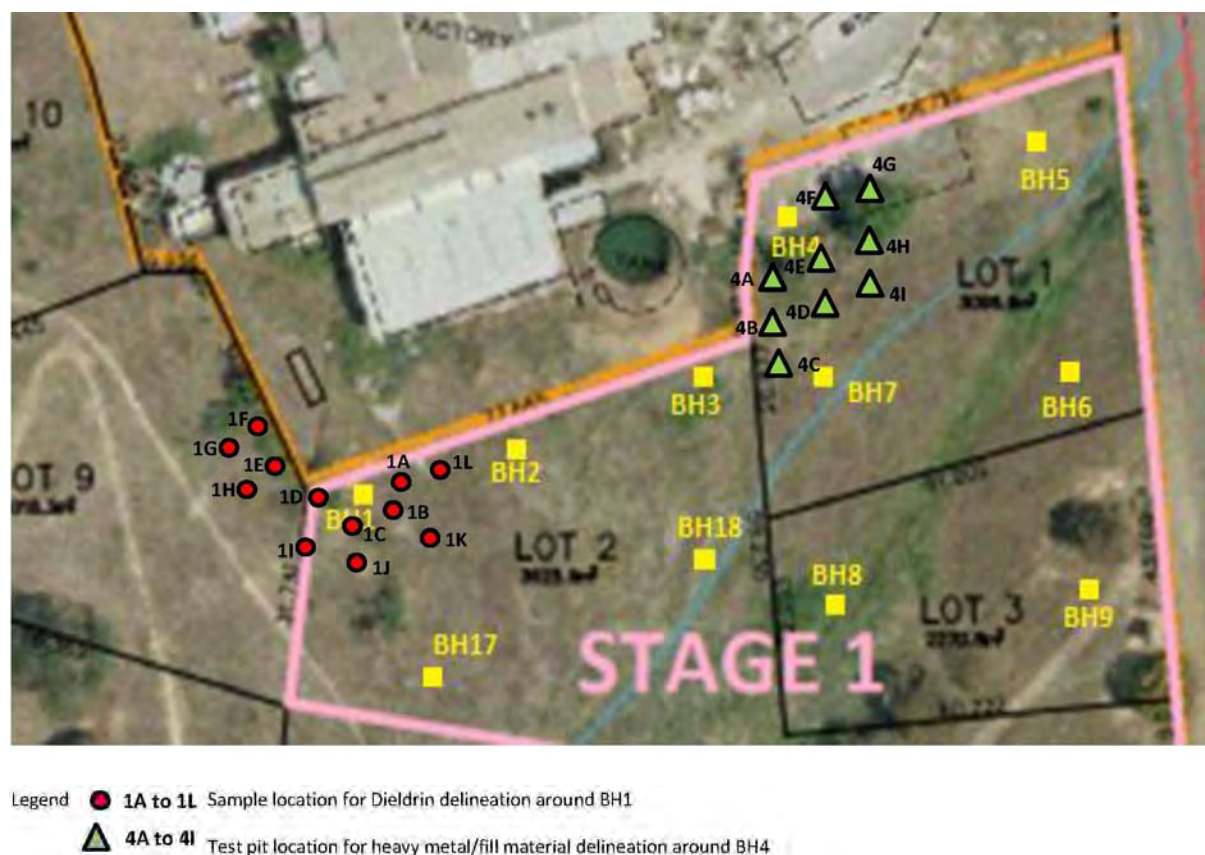


Figure 5.2 Delineation sample locations

c. Conclusions and recommendations

The metals concentrations reported in fill material in Lot 1 were below the commercial/industrial land use criteria, and are therefore considered to be suitable for the proposed land use as long as more sensitive land uses are not located in the vicinity of the metals-impacted fill. The investigation results indicated that the dieldrin-impacted soil along the northern boundary of Lot 2 is not suitable for either sensitive or commercial/industrial land uses, and will require remediation or management to facilitate the proposed land use.

Zoic does not consider that there is a Duty to Report contamination to the EPA under Section 60 of the *Contaminated Land Management Act 1997* as contamination is unlikely to migrate and the requirements regarding onsite contamination management can be adequately addressed by the planning process under the EP&A Act. Remediation works are not deemed to be categories 1 or 2 under the State Environmental Planning Policy No.55 – Remediation of Land.

Zoic recommends that the dieldrin-impacted material is excavated, stockpiled and re-characterised during development earthworks, with the possibility of on-site reuse if the material was statistically validated as being below the commercial/industrial land use criteria, or by isolating the material beneath a roadway, car park or other paved surface if the material exceeds the commercial/industrial land use criteria. The latter option would require the material to be recorded and managed in accordance with a long-term environmental management plan to prevent unintentional exposure during future site activities.

The effectiveness of any remediation or management of the dieldrin-impacted soil along the northern boundary of Lot 2 would need to be verified by an EPA accredited auditor, including validation sampling from the excavated area, to demonstrate that the land has been rendered suitable for the proposed land use(s) prior to the land being used for those purposes.

d. Implications for rezoning

SEPP 55 promotes the remediation of contaminated land to reduce the risk of harm to human and or environmental health. It states that the planning authority must be satisfied that land is suitable for the purposes proposed, and that any contaminated land will be remediated to a satisfactory level before being used for that purpose.

This assessment of potential contamination was undertaken for only the Stage 1 part of the development site. This indicated contamination in a small part on the northern boundary associated with historic pesticide use and uncontrolled fill containing heavy metals. Specifically, the dieldrin-impacted soil along the northern boundary is not suitable for either sensitive or commercial/industrial land uses, and will require remediation or management to facilitate the proposed land use. It is important to highlight that the affected land is within the area covered by the current Stage 2 consent for a medical centre, consulting rooms, day surgery, community health centre and rehabilitation clinic (MOD/0064/1314). This consent contains a deferred commencement consent condition requiring remediation of the contaminated land as follows:

2. A Stage 2 - Detailed Investigation under State Environmental Planning Policy No.55 ~ Remediation of Land is required. If this Investigation reveals that the degree of contamination exceeds NSW Environmental Protection Authority Guidelines then a Stage 3 - Remedial Action Plan (RAP) should be prepared and separate development consent will be required for the implementation of this RAP.

The assessment by ZOIC suggests that the remainder of the site (beyond Stage 1 of the development) is largely free of contamination. A preliminary investigation will be undertaken across the whole of the site should the proposal be given a positive Gateway determination.

ii SEPP (Infrastructure) 2007

The aim of this Policy is to facilitate the effective delivery of infrastructure across the State by:

- (a) improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and
- (b) providing greater flexibility in the location of infrastructure and service facilities, and
- (c) allowing for the efficient development, redevelopment or disposal of surplus government owned land, and
- (d) identifying the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development), and
- (e) identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and
- (f) providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.

It is important to highlight that the SP2 zone is a prescribed zone for health services facilities under the SEPP. In accordance with the provisions of the SEPP the proposal seeks to amend the Land Zoning Map to include the land in the SP2 'Health Services Facility' zone. This will allow for the establishment of the proposed uses as described in Section 1 of this report. The proposal is considered to be consistent with this SEPP as it will deliver necessary infrastructure to this part of the State.

iii SEPP (Sydney Drinking Water Catchment) 2011 (Wollondilly River)

The site is located within the Mulwaree River sub-catchment of the Sydney Drinking Water Catchment to which the State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 applies. This SEPP requires compliance with the Neutral or Beneficial Effects on Water Quality Guidelines (Sydney Catchment Authority 2011).

Consultants SEEC were engaged in 2012 to undertake a Water Cycle Management Study (WCMS) and MUSIC Model Assessment for Stage 1 of the proposed development (refer Appendix E). The WCMS included a bio-basin of approximately 300m² for an area which is 12.5% of the total site area. In accordance with the Neutral or Beneficial Effects on Water Guidelines, Stage 1 was identified as a module 5 development and the concurrence of the Chief Executive of the then Sydney Catchment Authority (SCA) was required prior to any development consent being given. SCA gave its approval for Council to grant consent for Stage 1 subject to a number of conditions, including that any revisions to the site layout or works must be agreed to by the SCA (now Water NSW).

A concept plan relating to the enhancement of the existing onsite dam and upstream wetlands has been prepared by (refer Appendix F). This plan includes the reconfiguration of the dam into a permanent wetlands basin and additional areas of wetlands upstream.

The total area available for runoff treatment is over 5,000m² or more than 16 times the comparative treatment area of 300m² that was required for one eighth of the current site development approved by Water NSW. This indicates the following:

- Water NSW has approved a more intensive development for the locality;
- there is significantly more area available to ensure neutral or beneficial effect can be achieved based upon the current approval; and
- the proposal would be able to easily comply with Water NSW's developed strategic land and water capability assessments for the catchment.

The proposed land uses in Stage 3 will be presented in detailed development application(s) that will demonstrate how the requirements of the Drinking Water SEPP will be met. The current recommended practices and standards adopted by Water NSW will be incorporated into the planning and design for the proposed uses. Accordingly, stormwater and drainage control measures will be implemented to ensure that the proposed development has a neutral or beneficial effect on water quality in accordance with the requirements of Water NSW.

5.3 Other relevant policy/legislation

5.3.1 Local Environmental Plans

The site is subject to the provisions of the Goulburn Mulwaree LEP 2009. The proposal's consistency and otherwise with the relevant requirements of the LEP is set out in Table 5.1.

Table 5.1 Compliance with LEP provisions

Clause	Comments	Compliance
Cl.1.2 – Aims of Plan	The proposed development is consistent with the aims of the plan as it involves the orderly use of the land for medical and community health facilities and seniors housing that can be constructed and operated with due consideration to the site constraints and opportunities. The development will not create ongoing adverse impacts on the site or lasting environmental impacts on the soil or water quality. Any potential impacts on the drinking water catchment can be effectively managed to achieve a beneficial effect on water quality. The facility can be operated on the site without adversely impacting on the surrounding land uses.	YES
Cl.1.9 – Application of SEPPs and REPs	The provisions of the State Environmental Planning Policies that apply to the land and the proposed development have been addressed in Section 5.2 of this report.	YES
Cl.2.2 – Zoning of land to which Plan applies	The site is mostly located within the IN1 General Industrial Zone, with a small portion zoned Public Recreation (RE1).	Rezoning of the IN1 General Industry land to the SP2 Infrastructure Zone is sought under this planning proposal.

Table 5.1 Compliance with LEP provisions

Clause	Comments	Compliance
Cl.2.3 - Zone objectives and land use table	The proposed development is generally consistent with the objectives of the proposed SP2 Infrastructure Zone The proposed development will generate employment in both the construction and operational phases of the development. The proposed development will not interfere with efficient use of surrounding land and operation of existing developments. The proposed development will have minimal potential impacts on the surrounding environment. The anticipated potential impacts such as traffic and drainage can be appropriately managed or as outlined in this proposal to prevent impacts on the amenity of surrounding properties. Medical centres are permissible with consent within the zone.	N/A The establishment of a hospital and aged care facility on the site requires the rezoning of the land as they are prohibited uses within the current IN1 General Industrial Zone.
Cl.4.3 – Height of Buildings	There is no maximum allowable height of buildings applicable to the development site.	The proposal seeks a maximum building height of 12 m. The HOB layer map in LEP 2009 is to be amended to reflect the proposed height provision for the site. Refer to appendix C. Refer also Section 3.2 of this report.
Cl.4.4 – Floor space Ratio	There is no floor space ratio applicable to the development site.	The proposal seeks a maximum floor space ratio of 0.7:1. The FSR layer map in LEP 2009 is to be amended to reflect the proposed FSR provision for the site. Refer to appendix C. Refer also Section 3.2 of this report.
Cl.4.6 – Exceptions to development standards	There are no proposed exceptions to the development standards.	
Cl.5.1 – Relevant acquisition authority	Land adjoining the site to the south which coincides with the Town Walk adjacent to the Wollondilly River has been identified on the Land Reservation Acquisition Map as land to be acquired for local open space (RE1). Council is the relevant acquisition authority. This land is not included in the planning proposal.	YES
Cl.5.9 – Preservation of trees and vegetation	The site has been highly modified over time and its biodiversity values have been significantly degraded. The majority of vegetation within the site is located along the riparian corridor and around the existing dam on the western side of the site. There are a small number of isolated trees as well as sparse grass and weedy groundcover. Some existing trees on the peripheral areas of the site will be retained. Whilst Stage 1 of the development is being constructed, the remaining area under Stage 2 will be landscaped in accordance with a Landscape Master Plan. This will improve the overall amenity and biodiversity value of the site.	YES

Table 5.1 Compliance with LEP provisions

Clause	Comments	Compliance
Cl.5.9AA - Trees or vegetation not prescribed by development control plan	Small patches of isolated eucalypts Argyle Apple (<i>Eucalyptus cinerea</i>), Candlebark (<i>E. rubida</i>), Narrow-leaved Ironbark (<i>E. crebra</i>) and Mugga Ironbark (<i>E. sideroxylon</i>) are present in the northwest, west and south of the site. It is likely that some of these eucalypts have been planted, particularly the Narrow-leaved Ironbark as it does not occur locally. The Narrow-leaved Ironbark will be removed following the DA stage to facilitate development. It is not listed as a threatened flora species under the DCP and it is not part of any threatened ecological community predicted to occur in the local area, therefore does not pose a constraint to development.	YES
Cl.5.10 – Heritage conservation	There are no anticipated impacts on historic or Aboriginal Heritage as a result of the proposed development. The site is currently vacant and is not located in a heritage conservation area under the Goulburn Mulwaree LEP. Previous site inspections with representatives of the Pejar Local Aboriginal Land Council did not reveal any evidence of relics, artefacts or items of interest within the site. There are recorded items of Aboriginal significance adjacent to the Wollondilly River west of the site. However, it has been confirmed they will not be impacted by the proposed development and the development area of the site has no heritage significance.	
Cl.5.10 – Bush fire hazard reduction	The site is not identified as bushfire prone land.	NA

Table 5.1 Compliance with LEP provisions

Clause	Comments	Compliance
Cl.7.1 – Flood planning	The western portion of Lot 101 is identified as flood planning land (Illustrated on Council’s Flood Planning Map – Sheet FLD_001D, see Figure 5.3) The affected area involves the western side of the southern portion of the site and part of the road reserve of the unformed Brewer Street. The development will not result in unsustainable social or economic costs to the community as a consequence of flooding and will not obstruct the safe occupation or evacuation of the land.	The council ‘Flood Planning Area’ shown on the maps relates to the 1% AEP event. As the proposal relates to medical facilities and therefore significant or critical infrastructure it will be necessary to use a lower frequency flood event which at the very least would be the 0.5% AEP. The extent of the 0.5% AEP was identified for the Health Hub stages 1 to 3 development. So in effect the flood event to be applied will be more than what is shown on the ‘Flood Planning Area’ maps. If required a detailed flooding analysis will be undertaken for the site if the proposal receives a positive Gateway determination. The analysis will be based upon the current Wollondilly and Mulwaree Rivers Flood Study (WMA Water,2016). Part of the required flood analysis will be to identify and discuss a number of issues such as: • applicable flood planning levels including freeboard for items such as minimum floor levels, carpark levels, evacuation levels etc; • low to high hazard areas; • flow velocities; • access during flood events; • evacuation location, warning etc; • maintaining power supply such as generator backup location and level; and • cost implications if damaged; building materials
Cl.7.1A - Earthworks	No major earthworks would be required in the proposed development as the site is relatively flat and generally ready for proposed construction works.	YES
Cl.7.2 – Terrestrial biodiversity	The site is not identified as environmentally sensitive land in terms of biodiversity.	NA
Cl.7.4 Restrictions on development adjoining mineral resource areas	The site is not identified as land adjoining, or in the vicinity of, land that is identified as ‘Mineral resources’ on the Mineral Resource Area Map.	NA

5.3.2 Consistency with Ministerial Directions

The proposal’s consistency with applicable Ministerial or s.117 Directions is set out in Table 5.2 below.

Table 5.2 Ministerial (s.117) Directions

Direction	Comment
1. Employment and Resources	
1.1 Business and Industrial Zones	The objectives of this direction are to: (a) encourage employment growth in suitable locations; (b) protect employment land in business and industrial zones; and (c) support the viability of identified strategic centres. As detailed in Section 1.4 of this report, there is currently an abundance of land zoned for industrial purposes in the Goulburn LEP. The site has remained vacant for several years which highlights the lack of demand for industrial zoned land. The recently adopted ELS supports the rezoning of the subject site concluding that the resultant loss of industrial land in Bradfordville will not have a significant effect on the future supply of employment land as there is enough available land elsewhere in the LGA and within the Precinct;
1.2 Rural Zones	The provision of medical facilities on the site has already been justified and approved under DA/1213/84. The proposed health facilities not only represent an appropriate land use for the site but will encourage employment growth in this part of Goulburn in accordance with the objectives of this Direction.
1.3 Mining, Petroleum Production and Extractive Industries	Not applicable Not applicable
1.4 Oyster Aquaculture	Not applicable
1.5 Rural Lands	Not applicable

Table 5.2 Ministerial (s.117) Directions

Direction	Comment
2. Environment and Heritage	
2.1 Environment Protection Zones	Objective The objective of this direction is to protect and conserve environmentally sensitive areas. What a relevant planning authority must do if this direction applies: (5) A planning proposal that applies to land within an environment protection zone or land otherwise identified for environment protection purposes in a LEP must not reduce the environmental protection standards that apply to the land (including by modifying development standards that apply to the land). This requirement does not apply to a change to a development standard for minimum lot size for a dwelling in accordance with clause (5) of Direction 1.5 <i>"Rural Lands"</i>. Land adjoining the site is identified on the Land Reservation Acquisition Map as Local Open Space (RE1) under the LEP. A detailed flora and fauna survey has been undertaken as part of this study and the identified sensitive areas would either be avoided or any clearing would be compensated for by offsets. The planning proposal will not result in a reduction in environmentally sensitive areas and is consistent with this Direction.
2.2 Coastal Protection	Not Applicable
2.3 Heritage Conservation	Objective (1) The objective of this direction is to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance. What a relevant planning authority must do if this direction applies (4) A planning proposal must contain provisions that facilitate the conservation of: (a) items, places, buildings, works, relics, moveable objects or precincts of environmental heritage significance to an area, in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item, area, object or place, identified in a study of the environmental heritage of the area, (b) Aboriginal objects or Aboriginal places that are protected under the <i>National Parks and Wildlife Act 1974</i>, and (c) Aboriginal areas, Aboriginal objects, Aboriginal places or landscapes identified by an Aboriginal heritage survey prepared by or on behalf of an Aboriginal Land Council, Aboriginal body or public authority and provided to the relevant planning authority, which identifies the area, object, place or landscape as being of heritage significance to Aboriginal culture and people. State Heritage item 302 'Riversdale' is listed under the Goulburn LEP 2009 Schedule 5 – Environment heritage, Part 1 – Heritage Items. This item is a single storey Georgian dwelling house and situated to the south of the site at 107 Wayo Street. Prior to finalisation of the design of the proposed uses a Statement of Heritage Impact (SOHI) will be prepared to assess impacts to heritage items in the vicinity including 'Riversdale' with particular attention emphasis on views and vistas and settings of the item.
2.4 Recreation Vehicle Areas	Not applicable

Table 5.2 Ministerial (s.117) Directions

Direction	Comment
3. Housing, Infrastructure and Urban Development	
3.1 Residential Zones	Not Applicable
3.2 Caravan Parks and Manufactured Home Estates	Not applicable
3.3 Home Occupations	Not Applicable
3.4 Integrating Land Use and Transport	Objective (1) The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives: (a) improving access to housing, jobs and services by walking, cycling and public transport, and (b) increasing the choice of available transport and reducing dependence on cars, and (c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and (d) supporting the efficient and viable operation of public transport services, and (e) providing for the efficient movement of freight. The planning proposal is consistent with Direction 3.4 where applicable.
3.5 Development Near Licensed Aerodromes	Not applicable
3.6 Shooting Ranges	Not applicable

Table 5.2 Ministerial (s.117) Directions

Direction	Comment
4. Hazard and Risk	
4.1 Acid Sulfate Soils	Objective (1) The objective of this direction is to avoid significant adverse environmental impacts from the use of land that has a probability of containing acid sulfate soils. What a relevant planning authority must do if this direction applies (4) The relevant planning authority must consider the Acid Sulfate Soils Planning Guidelines adopted by the Director-General of the Department of Planning when preparing a planning proposal that applies to any land identified on the Acid Sulfate Soils Planning Maps as having a probability of acid sulfate soils being present. (5) When a relevant planning authority is preparing a planning proposal to introduce provisions to regulate works in acid sulfate soils, those provisions must be consistent with: (a) the Acid Sulfate Soils Model LEP in the Acid Sulfate Soils Planning Guidelines adopted by the Director-General, or (b) such other provisions provided by the Director-General of the Department of Planning that are consistent with the Acid Sulfate Soils Planning Guidelines. (6) A relevant planning authority must not prepare a planning proposal that proposes an intensification of land uses on land identified as having a probability of containing acid sulfate soils on the Acid Sulfate Soils Planning Maps unless the relevant planning authority has considered an acid sulfate soils study assessing the appropriateness of the change of land use given the presence of acid sulfate soils. The relevant planning authority must provide a copy of any such study to the Director-General prior to undertaking community consultation in satisfaction of section 57 of the Act. (7) Where provisions referred to under paragraph (5) of this direction have not been introduced and the relevant planning authority is preparing a planning proposal that proposes an intensification of land uses on land identified as having a probability of acid sulfate soils on the Acid Sulfate Soils Planning Maps, the planning proposal must contain provisions consistent with paragraph (5). Not applicable to this site.
4.2 Mine Subsidence and Unstable Land	Not applicable

Table 5.2 Ministerial (s.117) Directions

Direction	Comment
4.3 Flood Prone Land	Objectives (1) The objectives of this direction are: (a) to ensure that development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the <i>Floodplain Development Manual 2005</i>, and (b) to ensure that the provisions of an LEP on flood prone land is commensurate with flood hazard and includes consideration of the potential flood impacts both on and off the subject land. What a relevant planning authority must do if this direction applies (4) A planning proposal must include provisions that give effect to and are consistent with the NSW Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005 (including the Guideline on Development Controls on Low Flood Risk Areas). (5) A planning proposal must not rezone land within the flood planning areas from Special Use, Special Purpose, Recreation, Rural or Environmental Protection Zones to a Residential, Business, Industrial, Special Use or Special Purpose Zone. (6) A planning proposal must not contain provisions that apply to the flood planning areas which: (a) permit development in floodway areas, (b) permit development that will result in significant flood impacts to other properties, (c) permit a significant increase in the development of that land, (d) are likely to result in a substantially increased requirement for government spending on flood mitigation measures, infrastructure or services, or (e) permit development to be carried out without development consent except for the purposes of agriculture (not including dams, drainage canals, levees, buildings or structures in floodways or high hazard areas), roads or exempt development. (7) A planning proposal must not impose flood related development controls above the residential flood planning level for residential development on land, unless a relevant planning authority provides adequate justification for those controls to the satisfaction of the Director-General (or an officer of the Department nominated by the Director-General). (8) For the purposes of a planning proposal, a relevant planning authority must not determine a flood planning level that is inconsistent with the Floodplain Development Manual 2005 (including the Guideline on Development Controls on Low Flood Risk Areas) unless a relevant planning authority provides adequate justification for the proposed departure from that Manual to the satisfaction of the Director-General (or an officer of the Department nominated by the Director-General). The planning proposal is consistent with Direction 4.3. If deemed necessary a flood study will be undertaken for the entire site should the planning proposal receive a positive determination from the Gateway.

Table 5.2 Ministerial (s.117) Directions

Direction	Comment
4.4 Planning for Bushfire Protection	Objectives (1) The objectives of this direction are: (a) to protect life, property and the environment from bush fire hazards, by discouraging the establishment of incompatible land uses in bush fire prone areas, and (b) to encourage sound management of bush fire prone areas. As stated in Table 5.1, the site is not identified as bushfire prone land. Therefore the planning proposal is consistent with Direction 4.4.
5. Regional Planning	
5.1 Implementation of Regional Strategies	Planning proposals must be consistent with a regional strategy released by the Minister for Planning. As discussed in Section 5.1.1, this proposal is consistent with the Sydney-Canberra Regional Strategy.
5.2 Sydney Drinking Water Catchments	The Planning Proposal will affect land within the Sydney drinking water catchment, and therefore the Section 117(2) Direction 5.2 applies. Under this Direction, planning proposals are required to be prepared in accordance with the principle that water quality in the Sydney drinking water catchment must be protected, that development have a neutral or beneficial effect (NorBE) on water quality, and that future land use be matched to land and water capability. The s117(2) Direction includes requirements that the relevant planning authority must: • ensure that planning proposals are consistent with State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 (Drinking Water SEPP), and • give consideration to the outcomes of any strategic land and water capability assessment (SLWCA), and • consult with Water NSW describing the means by which the proposal gives effect to water quality protection principles before issuing a gateway determination under section 56 of the <i>Environmental Planning and Assessment Act 1979</i>. The SLWCA constraints mapping provides a broad scale assessment of the potential risk to water quality from development. Preliminary advice from NSW Water (November 21 2016) is that a SLWCA assessment will be done at the time the Council sends the proposal to them for comment.
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	Not applicable
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	Not applicable
5.5 Development in the vicinity of Ellalong, Paxton and Millfield (Cessnock LGA) (Revoked 18 June 2010)	Not applicable
5.6 Sydney to Canberra Corridor (Revoked 10 July 2008. See amended Direction 5.1)	Not applicable

Table 5.2 Ministerial (s.117) Directions

Direction	Comment
5.7 Central Coast (Revoked 10 July 2008. See amended Direction 5.1)	Not applicable
5.8 Second Sydney Airport: Badgerys Creek	Not applicable
6. Local Plan Making	
6.1 Approval and Referral Requirements	This is an administrative requirement for Council.
6.2 Reserving Land for Public Purposes	This is an administrative requirement for Council. Part of the site is identified on the Land Reservation Acquisition Map as Public Recreation (RE1) under the LEP. This land does not form part of the planning proposal.
6.3 Site Specific Provisions	Objective (1) The objective of this direction is to discourage unnecessarily restrictive site specific planning controls. What a relevant planning authority must do if this direction applies (4) A planning proposal that will amend another environmental planning instrument in order to allow a particular development proposal to be carried out must either: (a) allow that land use to be carried out in the zone the land is situated on, or (b) rezone the site to an existing zone already applying in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already contained in that zone, or (c) allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended. (5) A planning proposal must not contain or refer to drawings that show details of the development proposal. The planning proposal adopts existing development standards and a zone contained in the principal LEP. It is therefore consistent with Direction 6.3.
7. Metropolitan Planning	
7.1 Implementation of the Metropolitan Plan for Sydney 2036	Not applicable

5.3.3 Development Control Plan

Development will accord with the standards set out in relevant planning instruments and policies. In addition, a site specific DCP will be prepared, to be included in Chapter 8 Site Specific .Provisions of the Goulburn Mulwaree DCP 2009 (DCP 2009). The DCP will be based upon a master plan. A master plan in the form of a DCP generally means a document consisting of written information, maps and diagrams that outlines the guidelines for development of the site. A DCP can be performance based and provide for flexibility to enable a development to occur over an extended period of time. This is consistent with some of the DCPs currently contained in Chapter 8 of DCP 2009.

The DCP will outline a set of performance objectives to guide the future development of the site in relation to a range of matters including:

- building setbacks, in particular in relation to the separation of the medical precinct from the industrial precinct;
- access including public transport, traffic, pedestrian and cycleway linkages;
- landscaping for public areas and open space; and
- building types and design; and
- matters relating to the development of seniors housing on the site

It is intended that the Master Plan and DCP be submitted to council following the rezoning process.

5.3.4 Compliance with Goulburn Mulwaree Council's Community Strategic Plan

The Goulburn Mulwaree Community Strategic Plan (CSP) 2030 identifies the priorities and aspirations for Goulburn as a community. The key strategic goals have been identified as follows:

- quality infrastructure;
- a strong economy;
- a vibrant economy;
- a sustainable environment;
- a leading organisation; and
- a retained heritage.

It is considered that this planning proposal provides more than adequate justification to change the zoning of the subject site in accordance with strategic policy. It concludes that there will be no adverse environmental impacts relating to traffic, noise, flooding, ecological, heritage and land use planning.

In accordance with the business and industry directions of the CSP, the proposal will facilitate the establishment of a health services facility that will promote a strong and vibrant economy. This will be achieved through the provision of high quality medical and health services and by generating employment within Goulburn.

The land zoned RE1 Public Open Space on the southern boundary of the site will be maintained for public access and to avoid potential interferences with existing local flood behaviour. In accordance with the strategic goals, the retention of the RE1 land will ensure that the local residents of Goulburn have access to existing areas public open space within their community.

One of the key strategic goals of the CSP is to promote a vibrant community. One of the primary objectives identified is:

...continuing to improve the lifestyle options, care services and community support structures available to its residents.

Section 3.1 of the CSP outlines the strategies in relation to health care. Clause 3.1.1 states:

To ensure the community has access to appropriate health care, services and facilities particularly for the aged, vulnerable and minority groups.

The CSP further outlines how the strategies could be achieved, including:

Council to advocate and facilitate discussions with relevant authorities to improve health care services and facilities.

In accordance with the goals and objectives of the CSP, this planning proposal provides Council with the opportunity to facilitate the establishment of medical and health care facilities on this centrally located site. These facilities will be available to all residents within the Goulburn community.

In support of the goals and objectives relating to the provision of a sustainable environment, the proposal will protect the RE1 zoned land adjoining the Wollondilly River and maintain the area designated for the 'town walk'. The site will also be landscaped in accordance with a detailed landscape plan to provide aesthetic improvements to the site and enhance the existing areas of public open space.

The potential for ecological and heritage impacts has been addressed in detail in sections 5.8 and 5.10 of this report. It is concluded that there will be no adverse impacts associated with the proposed development, which further meets the goals and objectives of the CSP to achieve a sustainable environment.

5.3.5 Goulburn Mulwaree Strategy 2020

Two key issues identified in the Goulburn Mulwaree Strategy that would be likely to affect the future growth and development of the local government area to 2020 are:

- *'Goulburn's role as a regional centre for Goulburn Mulwaree and the Upper Lachlan must be supported by ensuring social support systems such as health care, education, commercial and retail services are adequate; and*
- *Employment opportunities are required to retain young people in the area.'*

The document further states that:

Services within Goulburn should be extended as there is a lack of entertainment, health, aged care and youth facilities.

The document highlights that with the successful promotion of Goulburn as a regionally significant centre within the Sydney to Canberra Corridor together with local employment expansion, the population of Goulburn Mulwaree would be capable of reaching 32,000 residents by 2020. Together with housing affordability, growth within Goulburn Mulwaree will generally be achievable where employment opportunities continue to be realised together with the provision of appropriate services and infrastructure to support a growing population base.

The strategy also states that

Council, together with supporting agencies have a primary role in providing the most appropriate environment and infrastructure for social and economic development including facilitating the delivery of services such as education and health and enhanced lifestyle factors such as cultural and recreational facilities.

As stated in section 5.1.2 of this report, this planning proposal will facilitate the establishment of necessary medical and health facilities and provide substantial opportunities for employment. The proposal is a positive response to the expanding population and demand for upgraded, higher quality medical and health facilities in the region. This in turn will assist in promoting Goulburn as a regionally significant centre within the Sydney to Canberra Corridor.

5.3.6 Employment Lands Strategy 2016

Council adopted the Goulburn Mulwaree Employment Lands Strategy (ELS) on December 20, 2016. This Strategy is part of a broader Council agenda to inform an evidence-based review of its planning controls (Local Environmental Plan etc), and as part of the 'Growing & Sustaining Goulburn Mulwaree – Your Future, Your Say' program, The ELS will guide future decision-making by Council and other stakeholders by:

- assessing the availability and demand for employment lands;
- considering the drivers for economic growth and emerging industries;
- establishing recommendations upon which to consider future amendments to the Goulburn Mulwaree Local Environmental Plan 2009; and
- integrating the planning analysis and recommendations to support the economic development/marketing activities of Council, in particular to future industries and employers.

As part of its resolution to approve the ELS, Council resolved that:

Council staff continue to process REZ/0001/1415 – Health Hub (Ross Street, Bradfordville) Planning Proposal and report back to Council prior to forwarding the Planning Proposal to the Department of Planning and Environment for a Gateway Determination under Section 56 of the Environmental Planning and Assessment Act 1979.

The above resolution is consistent with the short, medium and long term recommendations for employment land contained within the ELS

The short term recommendations for the Bradfordville Industrial Estate Precinct within which the subject land is located, are:

- rezone Ross Street from IN1 General Industrial to SP2 Infrastructure (Health Services Facility); and
- investigate alternate access to 37 Ross Street from Brewer Street as part of the rezoning process.

Ministerial guidelines for LEP amendments state that planning proposals must not reduce the potential floor space area for industrial uses in industrial zones unless it is justified by a strategy, land use study or deemed of minor significance. The subject planning proposal for the health hub has clear strategic justification based on the following:

- the ELS concluded that the development of a Goulburn Health Hub has planning merit in both social and economic terms through co-location of a range of health services for the community, job creation and flow on effects to service industries;
- the ELS takes into consideration any concerns that were raised in relation to the loss of industrial land (20% of the precinct), and the precedent a rezoning of this kind may have on the remainder of the Bradfordville Industrial Precinct; and
- notwithstanding the loss of industrial land, on balance the ELS recommends that a rezoning to SP2 Infrastructure is supported.
-

5.4 Physical constraints

5.4.1 Topography

As stated in Section 1.2.2 the site is relatively flat and drains towards the Wollondilly River to the south-west. Overall, the site's topography does not constrain the development.

5.5 Drainage, flooding and water quality

The western portion of Lot 101 is identified on Council's Flood Planning Map – Sheet FLD_001D as a flood planning area. The affected area involves the western side of the southern part of the site and part of the road reserve of the unformed Brewer Street (see Figure 5.3). Within this flood affection portion is the area zoned Public Recreation (RE1).

The upstream catchment has both residential areas and industrial areas that contribute to the flows through the site. The residential areas are generally upstream of the railway lines, and are drained by a pipe network beneath the railway line and into the site directly at the northern boundary, or into the existing drainage network in Ross Street which then discharges into an open channel within the Brewer Street alignment. The channel eventually discharges into existing wetlands just upstream of the existing dam on the site. Refer to Photograph 5.1 below.



Photograph 5.1 **Aerial photograph – approximate extent of wetlands**

It is understood that Goulburn Mulwaree Council had a catchment analysis undertaken some ten years or so ago for the whole of the urbanized area of Goulburn. A Gross Pollutant Trap (GPT) was intended to be located within Ross Street near the intersection with Taralga Road to cleanse the stormwater runoff from the residential area upstream. The current approved industrial subdivision for the site included a GPT sized to cater for the whole upstream catchment as well as the contributing industrial areas and the proposed development. The cost of this was to be shared between the developer and Council based upon contributing catchment areas.

It is intended as part of this development that the existing wetlands and dam be retained and enhanced to replace the intended GPT. This would include a trash collector and sediment fore-bay upstream of the existing wetlands to prevent debris and sediment being deposited into this area. Current best practice would be adapted and include reshaping the dam to enable additional macrophetic planting and possibly a floating wetlands within the dam.

The existing wetlands upstream of the dam already has a good coverage of native grasses with 30-40% of the area having *Carex* and *Juncus* species growing in the wetter areas. It is intended that this area be developed into a riparian zone to allow for recreational, therapeutic and educational purposes and to include the following:

- the area dominated by exotic grasses and weeds - planting of select areas with trees and shrubs to create pockets of shade and habitat;
- the area modified by earthworks - planting of select areas with trees and shrubs to create pockets of shade and habitat; and
- the area with existing native grasses and sedges - management of exotic grasses with weed control and supplementary planting where needed.

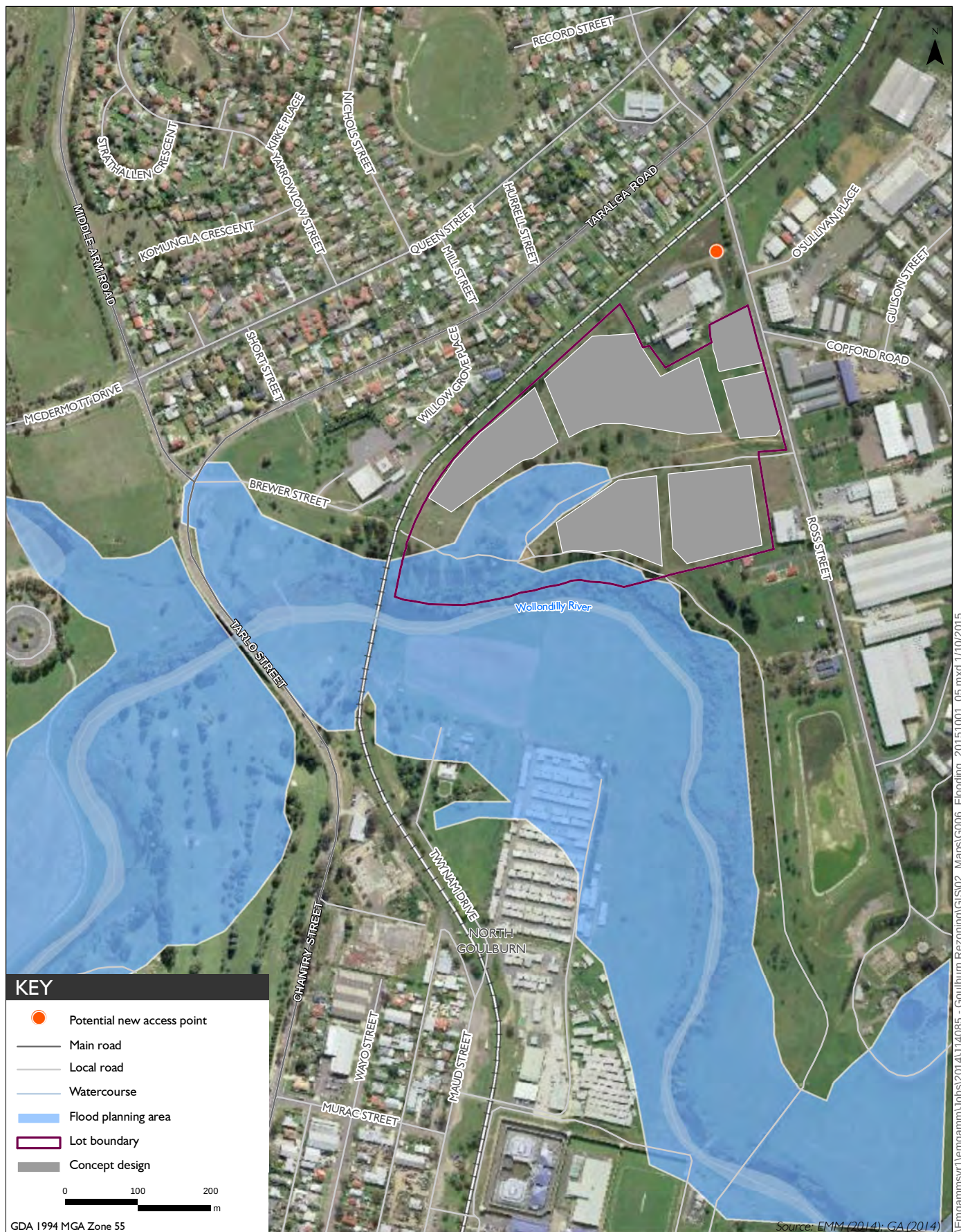
The proposed enhancement of the existing dam and wetlands will be advantageous to the installation of a GPT as it will create a more scenic area as well as reducing the ongoing maintenance costs that are associated with a GPT.

As part of this enhancement of the exiting water treatment facilities, it is proposed that the Brewer Street alignment is deleted to avoid the impacts this road would have upon the existing wetlands. A private internal road will provide access to the development. Further to this, the proposed revised development will not require the connection to the arterial road system that an industrial development would benefit from. Heavy vehicles that currently serve the industrial area to the east would most likely prefer the Taralga Road/Ross Street route.

The development will not result in unsustainable social or economic costs to the community as a consequence of flooding and will not obstruct the safe occupation or evacuation of the land. Notwithstanding, a flood study would be undertaken should the proposal proceed to the Gateway.

5.6 Bushfire risk

The site is not identified as bushfire prone land on Council's Bushfire Prone Land Map.



Flood planning map (Goulburn LEP 2009)

Proposed Rezoning for the Goulburn Health Hub at 35 Ross Street

Planning proposal

Figure 5.3

5.7 Aboriginal cultural heritage

Previous site inspections with representatives of the Pejar Local Aboriginal Land Council did not reveal any evidence of relics, artefacts or items of interest within the site (refer correspondence from Pejar Local Aboriginal Land Council – Appendix G). There are recorded items of Aboriginal significance adjacent to the Wollondilly River west of the site, however, it has been confirmed they will not be impacted by the proposed development and the development area of the site has no heritage significance.

If deemed necessary, an Aboriginal Due Diligence Assessment in accordance with the Department of Environment, Climate Change and Water (DECCW 2010) code of practice will be prepared. An ACHA (Aboriginal Heritage Cultural Assessment) Report in accordance with the code of practice might be required prior to the final building design.

There are no anticipated impacts on Aboriginal heritage as a result of the proposed development.

5.8 Historic heritage

The site is currently vacant and is not located in a heritage conservation area under the Goulburn Mulwaree LEP. The site itself has no historical significance.

State Heritage item 302 'Riversdale' is listed under the Goulburn LEP 2009 Schedule 5 – Environment heritage, Part 1 – Heritage Items. This item is a single storey Georgian dwelling house and situated to the south of the site at 107 Wayo Street. Prior to finalisation of the design of the proposed uses a Statement of Heritage Impact (SOHI) will be prepared to assess impacts to heritage items in the vicinity including 'Riversdale' with particular attention emphasis on views and vistas and settings of the item.

5.9 Ecology

A detailed ecology report has been prepared in support of the proposal (refer Appendix H). The site is currently used for cattle grazing, and was previously used as a golf course. Accordingly, it is in a highly disturbed state. It is characterised by exotic pasture that contains numerous planted exotic shrubs, with occasional eucalypts present that are likely to have been planted. One of these eucalypts, a Mugga Ironbark (*Eucalyptus sideroxylon*) will be removed during the DA stage of the project to facilitate the works. This tree is not a threatened flora species, or part of any endangered ecological community that occurs in the locality. No native vegetation communities or threatened flora species occur at the site due to the high degree of disturbance.

A number of scheduled Class 4 Noxious Weeds occur at the site including Basket Willow (*Salix viminalis*), Serrated Tussock (*Nassella trichotoma*), Patersons Curse (*Echium plantagineum*) and Blackberry (*Rubus fruticosus* spp. agg). Their management will be considered at the DA stage.

A drainage line flows from the eastern site boundary to pond in the centre of the site, which would flow into to the Wollondilly River after heavy rainfall. The drainage line and pond are considered to provide minimal fish habitat, however the Wollondilly River into which it flows is classed as a major fish habitat as it is a permanently flowing river.

Given the level of disturbance and modification, the site provides limited habitat for native fauna species, almost entirely limited to common bird species. The site may contain habitat for some threatened and migratory fauna species on an infrequent basis including:

- pond and surrounding grassland: the Cattle Egret (*Ardea ibis*) and Great Egret (*Ardea alba*) (listed as migratory species under the EPBC Act) may forage in these areas when inundated;
- scattered trees and shrubs: may provide occasional foraging habitat for listed threatened species the Gang-gang Cockatoo (*Callocephalon fimbriatum*) and Grey-headed Flying-fox (*Pteropus poliocephalus*); and
- Wollondilly River adjacent to the site: may provide occasional foraging habitat and a migration corridor for the migratory White-bellied Sea Eagle (*Haliaeetus leucogaster*), and potential hunting habitat for the threatened Little Eagle (*Hieraeetus morphnoides*).

However, the site does not contain core habitat for any migratory or threatened fauna species (ie important habitat for breeding, foraging, shelter or dispersal).

No immediate terrestrial or aquatic ecological constraints to development were identified during the desktop review and site inspection. However, a number of issues have been identified that will require further consideration during the next stage of the development:

- further assessment would be required for threatened species considered likely to occur in accordance with Section 5a of the EP&A Act for TSC Act listed, and in line with the Environment Protection and Biodiversity Conservation Act 1999 (EPBC) Act for matters of National Environmental Significance (ie migratory species);
- development of a noxious weeds control plan as the Noxious Weeds (NW) Act requires landowners to manage the growth of Class 4 Noxious Weeds in a manner that continuously inhibits the ability of the plant to spread and the plant must not be sold, propagated or knowingly distributed; and
- development of a sediment and erosion control plan to minimise risks of pollution from the development to the aquatic habitat in the adjacent Wollondilly River.

5.9.1 Impact assessment

Assessments of significance were completed in accordance with Section 5a of the *Environmental Planning and Assessment Act 1979* and the *Environment Protection and Biodiversity Conservation Act 1999* for listed species with potential habitat at the site. Table provides a list of the species assessed and the outcomes of the assessments (Appendix H).

Table 5.3 Assessments of significance

Species/guild	Outcome of assessment	Justification for outcome
Threatened raptors: Little Eagle	Not significant	- breeding habitat is absent from the site; and - potential hunting habitat will not be directly impacted.
Species that forage in trees and shrubs: Gang-gang Cockatoo and Grey-headed Flying-fox	Not significant	- breeding habitat is absent from the site; and - there will be no direct impacts to potential foraging habitat.
Migratory wetland species: Cattle Egret and Great Egret	Not significant	- an ecologically significant proportion of these species are not known to reside in or surrounding the site; and - the site and surrounds do not contain important habitat for these species.
Migratory raptors: White-bellied Sea Eagle	Not significant	- an ecologically significant proportion of these species are not known to reside in or surrounding the site; and - the site and surrounds do not contain important habitat for the species.

5.9.2 Ecological constraints

No immediate ecological constraints to development were identified during the desktop review and site inspection. However a number of issues have been identified that will require further consideration during the next stage of the development:

- development of a noxious weeds control plan as the NW Act requires landowners to manage the growth of Class 4 Noxious Weeds in a manner that continuously inhibits the ability of the plant to spread and the plant must not be sold, propagated or knowingly distributed; and
- development of a sediment and erosion control plan to minimise risks of pollution from the development to the aquatic habitat in the adjacent Wollondilly River.

Refer to Appendix G for further detail.

5.10 Traffic and transport

A detailed traffic study was undertaken to support the proposal in December 2014 (refer Appendix I).

This original assessment was based on the proposal that Ross Street/Taralga Road will be the main road network access point for the development.

An investigation of the proposal for an alternate access from Brewer Street (as required by the recommendation of the ELS) has been undertaken and is now included in Section 5.10.6 of this report. The information contained in the December 2014 traffic assessment in relation to existing roads and conditions, proposed traffic generation, parking, public transport and other modes are still relevant to this proposal and continue to be relied upon.

The following general matters have been considered, which are outlined in the Roads and Maritime Services (RMS) Guide to Traffic Generating Developments (RTA 2002):

- the site locality;
- the existing road network and intersections;
- the likely traffic generating and car parking characteristics of the proposal; and
- a summary of the potential impacts and required mitigation measures.

The traffic and transport impacts from the proposal have been assessed and the following conclusions are made.

5.10.1 Existing Roads and Traffic Conditions

The existing daily traffic volumes using the surrounding roads, including Ross Street, Taralga Road, McDermott Drive and the Old Hume Highway route via Sydney Road, Lagoon Street and Auburn Street, have been quantified for this report from RTA/RMS and other traffic surveys. The roads considered are all currently operating well within their peak hourly and daily traffic capacity thresholds and have relatively free-flowing traffic conditions as a result.

Taralga Road (MR 256) is a major road which provides the arterial route connection between Goulburn and Taralga. Within the Goulburn area the route connects via Tarlo Street, Chantry Street and Union Street to the Old Hume Highway (now MR 676) through Goulburn.

Ross Street is a wide industrial road which has a straight and generally level alignment in the vicinity of the site and rises slightly towards its intersection with Taralga Road. There are no traffic signal controlled intersections in the localities of Bradfordville and North Goulburn, north of the Old Hume Highway access intersection at Union Street.

The historic trend in daily traffic volumes for Taralga Road is recorded in RTA/RMS traffic surveys for location 94.942 (Taralga Road north of Dalley Street) which is east of Ross Street. The following daily traffic volumes were recorded, which indicate relatively low annual growth between the two survey years:

- 2,731 vehicles per day in the year 2000; and
- 2,836 vehicles per day in the year 2003.

The following peak hourly traffic volumes were determined for Ross Street in a survey conducted in October 2012 by GTA Traffic Consultants:

- Ross Street, south of Taralga Road, morning peak hour = 160 vehicles; and
- Ross Street, south of Taralga Road, afternoon peak hour = 180 vehicles.

Elsewhere in Goulburn, the historic RTA/ RMS daily traffic volumes for the year 2003 indicate the following range of daily traffic volumes for other roads which are more heavily trafficked routes:

- Old Hume Highway east of Taralga Road (Sydney Road) = 8,668 daily vehicles (axle pair count);
- Old Hume Highway south of Taralga Road (Auburn Street) = 13,807 daily vehicles (axle pair count); and
- McDermott Drive, at Wollondilly River Bridge = 9,964 daily vehicles (axle pair count).

5.10.2 Proposal generated traffic after rezoning

Additional traffic generated by the proposal in the vicinity of the Taralga Road and Ross Street intersection, which will be the primary site access route, will be 198 additional morning and 272 additional afternoon peak hourly vehicle movements. The future intersection operations have been assessed with this additional traffic and also with the additional traffic movements from the approved medical centre (288 additional morning and 245 afternoon peak hourly vehicle movements).

The additional traffic from both these future land uses will be distributed approximately 50% via Taralga Road to and from the west, 37% via Ross Street and other routes to and from the north and 15% via Taralga Road to and from the east.

The future site traffic from the rezoning (after adjustment to the base traffic conditions to accommodate the approved medical centre traffic) will generate the following approximate daily traffic increases on roads in the immediate locality: 22% on Taralga Road to the west; 37% on Ross Street to the north; and 11% on Taralga Road to the east. These traffic increases are considered to be acceptable in the locality due to the current major road classification, or non-residential nature of the traffic routes affected.

Elsewhere, on other traffic routes such as the Old Hume Highway intersection at Union Street the future traffic increases generated by the proposal would not be significant. Both peak hour and daily traffic increases would typically be less than 10% and not warrant detailed analysis of intersection impacts given the low baseline traffic volumes.

Brewer Street will be deleted and a private road will be constructed to meet the design requirements of AS 2890 Part 2 (refer section 3.1 of the Traffic Report – Appendix I).

With regard to the Taralga Road and Ross Street intersection, traffic analysis indicates that a roundabout will not be necessary. The hospital precinct will not generate large numbers of daily truck movements or many movements by large trucks to warrant land acquisition for the construction of a roundabout. It is also considered that the acute angle of the intersection is within the normal range of angles which is 70 degrees to 110 degrees which are considered as normal for either a T intersection or a cross intersection.

5.10.3 Intersection performance

Existing safety conditions at the Taralga Road and Ross Street intersection, including sight distances, have been reviewed and are considered to be acceptable. The intersection safety would not be adversely affected by additional traffic generated from the proposed rezoning assuming no changes to car parking arrangements occur in the vicinity of the intersection.

SIDRA intersection analysis shows generally minimal changes in the intersection levels of service which generally remain at either LoS A or B (which corresponds to good traffic conditions) in all scenarios. The intersection degrees of saturation and maximum traffic queue lengths do increase noticeably in the full rezoning development traffic scenarios. However, the future intersection degree of saturation still remains below 0.500 in all the scenarios and the predicted future maximum traffic queues generally occur on the northern and the southern (Ross Street) approaches to the intersection and would not generally affect the traffic movements on the two major road (Taralga Road) approaches to the intersection.

5.10.4 Parking provision

Employee and visitor car parking (including disabled car parking) and bicycle parking for each building within the rezoned land will be provided in accordance with the standards specified in the Goulburn Mulwaree DCP 2009. Where no car parking rate is specified, alternative standard car parking provision rates from the RMS Guide and/or other council standards in the region would be considered and the most appropriate standard applied.

5.10.5 Public transport and other travel modes

The existing regular scheduled public bus services operating in the Bradfordville area (via routes 821A and 821B) provide the primary public transport connections in the locality. Subject to negotiation with the bus operator, some or all of the bus services along these routes will be extended to also travel via the section of Ross Street adjacent to the site, as this would reduce walking distances for persons travelling by public transport.

Walking and cycling access will also generally be feasible to and from the site for persons living in North Goulburn. It will generally be necessary to provide a 1.25 m wide paved footpaths along the western side of Ross Street between the site and Taralga Road to accommodate pedestrian and cycle access.

5.10.6 Alternate access off Brewer Street

The following summarises the likely changes to the proposed Health Hub (Medical Precinct) traffic impacts if alternative vehicular access is provided to either all or part of the subject land via a new local road connection (Brewer Street extension) which would be constructed on the subject land to connect to Taralga Road via the existing short section of Brewer Street which forms a four way intersection with Taralga Road and Middle Arm Road, approximately 800 m west of the Ross Street intersection.

It is understood that the intention of the proposed additional access is to minimise traffic on Ross Street and to achieve a separation of the future industrial and medical precinct access in the Bradfordville area.

It is recommended that the future 'extension' to Brewer Street should effectively only serve the future medical precinct and not actually connect to Ross Street at the eastern end, in order to achieve separation of the industrial area traffic from the future medical precinct traffic. (Refer to Concept Plan Figure 1.2).

The main positive aspect of the alternative Brewer Street access proposal is that the future medical precinct traffic movements using Ross Street and the Ross Street/Taralga Road intersection would be significantly reduced. This would also result in fewer residential properties along Taralga Road in the vicinity of Ross Street being affected by additional traffic from the future medical precinct and lower future peak hour intersection traffic delays at the Ross Street/Taralga Road intersection.

The alternative (Brewer Street extension) access proposal would also have some local travel efficiency benefits for the future Medical Precinct employee and visitor traffic as there would be shorter travel distances via Brewer Street than via Ross Street, for this traffic, when travelling to or from most of the other urban areas of Goulburn which are either to the south or west of Bradfordville.

The future intersection traffic impacts of the Medical Precinct – Health Hub traffic will be significantly reduced by distributing this traffic between two major intersection access points from Taralga Road (ie both Brewer Street and Ross Street) such that the future need for intersection improvements (such as a roundabout) should be avoided at either location.

The high level investigation of the proposed access off Brewer Street identifies that future traffic efficiencies can be achieved. However it should be recognised that feasible road access via an existing public road (Ross Street) can still be achieved as identified in the traffic assessment summarised in this section and contained in Appendix I.

The most appropriate access for the site can be determined as part of any future planning and development assessment bearing in mind the intention to minimise conflict between future industrial traffic and medical precinct traffic. Future SIDRA modelling of the impact of the access on the four way intersection between Taralga Road, Middle Arm Road and Brewer Street will be required as part of a future development application.

5.11 Noise impact assessment

5.11.1 Noise impacts from the development

EMM has completed a noise impact assessment (operational and construction) as part of this planning proposal for the construction and operation of the Goulburn Health Hub.

For operational noise from the development impacting neighbouring landuses, the results indicate that Stage 1 and 2 operations will comply with relevant criteria. For Stage 3, maximum recommended sound power levels for plant and equipment to meet the relevant criteria have been provided. Where future plant and equipment exceed these levels, noise controls and management strategies would be required to satisfy relevant criteria.

It is envisaged that no significant operational noise impacts would arise from the proposed rezoning of the project site.

The construction noise assessment demonstrates that construction activities for Stages 1 and 2 would comply with standard hour construction criteria at all assessment locations.

Noise levels will exceed criteria during the majority of Stage 3 construction at assessment locations R1 and R2 for calm and inversion conditions.

It is envisaged that no significant construction noise impacts would arise from the proposed rezoning of the project site for construction works performed during standard hours.

In summary, the report concludes that the overall impacts will be negligible and the proposed development will comply with the relevant noise standards, guidelines and policies. Refer to Appendix .

5.11.2 Noise impact on the development

A noise assessment by Acoustic Consulting Engineers (ACE) was completed in June 2014 on the noise affects on the development from the existing environment (eg traffic and existing industry noise). This report is appended to the EMM acoustic report (Appendix J).

The ACE study concludes that with the implementation of the recommendations in this report, noise levels from external sources will be within desirable 37dB L_{Aeq} internal goal recommended by relevant Australian standards. The recommendations include modest improvement to glazing and adoption of acoustic seals and otherwise general good practice construction detail to ensure acoustic performance of such is not compromised.

6 Community consultation

The proponent has undertaken extensive community consultation over the past two and a half years. Generally, the feedback from most individuals and organisations has been extremely positive. Extensive consultation has been undertaken with existing health and community services within the area in order to gain an understanding of the current situation and what key services need to be provided as part of the Goulburn Health Hub. Consultation has also been undertaken with owners and operators within the Bradfordville industrial estate, which identified support without exception for the proposal.

Consultation with the local community has been also been undertaken and the outcomes have been extremely positive. Many individuals have voiced concern over the existing Goulburn Hospital stating that it is outdated and unsuited to the delivery of contemporary health care. Further, the principles underlying the proposed health care facility will enable a co-ordinated approach to care and one which is responsive to the changing needs of an ageing population on a greenfield site is supported. A summary of the consultation held is provided in Appendix K – Table K.1.

A site assessment was undertaken in consultation with Pejar, the local Aboriginal Land Council, in the context of a proposed industrial subdivision in September 2005. The results of this assessment are contained in Appendix G. Further consultation with Pejar will be undertaken as necessary as part of any development assessment process for future stages of development.

In addition to the above, the recently adopted ELS was supported by a stakeholder engagement plan, which involved an integrated program of engagement activities structured around consultation meetings with a focus on awareness raising and issues identification.

Goulburn Mulwaree Council hosted four stakeholder consultation meetings in October 2015. The stakeholder groups consisted of Council officers, real estate agents, local business/community groups and surveyors/planners involved in the development industry. Ongoing engagement, including one-on-one meetings, continued throughout the development of the ELS.

The consultation process provided stakeholders with an opportunity to build and test the findings from the review of current strategies, and identify issues associated with employment lands within the LGA.

7 Conclusions

This proposal would enable future land uses which have substantial planning and environmental benefits in their own right and particularly over the current zoning. In accordance with the requirements of 'A guide to preparing planning proposals' (DoP 2009), a review of relevant strategic plans has been undertaken. It shows that the proposal is consistent with applicable regional and local strategic objectives.

In particular, the 2016 Employment Lands Strategy for Goulburn Mulwaree supports the proposed rezoning. The ELS acknowledges that the loss of general industrial land in Bradfordville will not have a significant effect on the future supply of employment land as there is enough available land elsewhere in the LGA and within the Bradfordville Industrial Precinct.

The ELS recommends that a rezoning to SP2 Infrastructure is supported for the following reasons:

- a Medical Centre is permissible and already approved on the site;
- the loss of industrial land in Bradfordville will not have a significant effect on the future supply of employment land as there is enough available land elsewhere in the LGA and within the Precinct;
- the Goulburn Mulwaree LGA like many other areas is moving towards a more serviced based economy, and coupled with an ageing population there is demand for increased health facilities. The nearest private hospitals are located in Bowral and Canberra;
- the potential for land use conflict is considered minimal as the site is located on the west of the Precinct and is adjacent to residential land which lies to the north west of the site as well as public and private recreation zoned land to the north west. It is considered that interface issues with the general industrial area can be adequately addressed (large building setbacks, landscaping etc);
- there is opportunity to open up access to the subject site from Brewer Street which would minimise traffic on Ross Street; and
- the economic and social benefits are considerable and will provide employment opportunities as well as increased facilities for the community.

The site is considered appropriate for the proposal as it is located on the edge of the Bradfordville industrial estate, where it will provide a transition between more sensitive adjoining land uses to the north, west and south (residential, conservation and recreation) and the industrial estate.

Traffic and noise assessments demonstrate that there are unlikely to be any significant acoustic or traffic impacts from the proposal.

Development on this site will be guided by a concept plan specifying building design, siting, materials and landscaping standards. The standards will be incorporated into a site specific DCP.

The overall outcome will be a positive resolution of planning outcomes for Goulburn. The proposal is a direct response to government strategies seeking to meet the growing demands for a range of medical and healthcare facilities driven by an ageing population, lifestyle diseases and new care technologies.

References

Zoic 2013a, *Targeted Stage 2 Environmental Site Assessment Report for the Goulburn Health Hub Redevelopment*, Part Lot 10 DP1095440, 37 Ross Street Goulburn NSW.

Zoic 2013b, *Delineation and Remediation Options Assessment – Goulburn Health Hub Redevelopment*, 35 Ross Street Goulburn NSW (October 2013).

National Healthcare Agreement 2012 (Intergovernmental Agreement on Federal Financial Relations).

Roads and Traffic Authority 2002.