

HEALTH INFRASTRUCTURE

Review of Environmental Factors – Griffith Base Hospital

Community Health Building 33

21/12/2023

Version 1



Version Control

Version	Date	Author	Description	Reviewed by	Approved by
1	02/08/2022	GM	Draft for HI review	PS	PS
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Declaration

This Review of Environmental Factors (REF) has been prepared for NSW Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from the primarily internal to fit-out works to the existing redundant ambulatory care building for a community health services building at Griffith Base Hospital located at 5-39 Animoo Avenue, Griffith.

This REF has been prepared in accordance with the relevant provisions of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and *State Environmental Planning Policy (Transport and Infrastructure) 2021*.

This REF provides a true and fair review of the activity in relation to its likely impact on the environment. It addresses to the fullest extent possible, all the factors listed in clause 171 of the EP&A Regulation and the Commonwealth Environmental Protection and Biodiversity Conservation Act 1999 (EPBC ACT).

On the basis of the information presented in this REF it is concluded that by adopting the recommended mitigation measures it is unlikely there would be any significant environmental impacts associated with the activity. Consequently, an Environmental Impact Statement (EIS) is not required.

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Date: 03/10/2023

Document Management, Tracking and Revision History

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Appendices

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A	Section 10.7 Certificate	Griffith City Council	Certificate no. 7031/2022
B	Architectural Plans	DJRD Architects	Issue 3 and 4 (04.06.2021)
C	Building Code of Australia Report	Blackett Maguire and Goldsmith	30 August 2022
D	Construction Methodology Plan	Adco	31 January 2023
E	Site Survey Plan	Rivland Surveyors	Rev B 13.12.2017
F	Notification letter to Council and Community letters	Health Infrastructure	
G	Aboriginal and Cultural Assessment Report	Comber Consultants	January 2021
G	Aboriginal Heritage Impact Permit	Heritage NSW - Aboriginal Cultural Heritage Regulation – South	12 November 2020
H	Traffic and Parking Report	PTC	16 April 2021
I	Mitigation Measures Summary	Urbis	28 November 2023
J	Consultation Summary	N/A	28 November 2023

Abbreviations

Abbreviation	Description
AEC	Area of Environmental Concern
AHD	Australian Height Datum
AHIP	Aboriginal Heritage Impact Permit
AHIMs	Aboriginal Heritage Information Management System BC Regulation
AMG	Australian Map Grid
BC Act 2016	Biodiversity Conservation Act 2016
BC Act 2017	Biodiversity Conservation Act 2017
BC Regulation	Biodiversity Conservation Regulation 2017
BAM	Biodiversity Assessment Method
CA	Certifying Authority

Abbreviation	Description
CE	Chief Executive
CM Act	Coastal Management Act 2016
CMP	Construction Management Plan
CRA	Conservation Risk Assessment
DPC	Department of Premier and Cabinet
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EES	Environment, Energy and Science
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act (Cwth)	Environment Protection and Biodiversity Conservation Act 1999
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
FM Act	Fisheries Management Act 1994
Ha	Hectares
HHIMS	Historic Heritage Information Management System
HI	NSW Health Infrastructure
Transport	State Environmental Planning Policy (Transport and Infrastructure) 2021
LEP	Local Environmental Plan
LGA	Local Government Area
MPS	Multipurpose Service
MNES	Matters of National Environmental Significance
NPW Act	National Parks and Wildlife Act 1974
NPW Regulation	National Parks and Wildlife Regulation 2009
NPWS	National Parks and Wildlife Service (part of EES)
NT Act (Cth)	Commonwealth Native Title Act 1993
OEH	(Former) Office of Environment and Heritage
PCMP	Preliminary Construction Management Plan
POEO Act	Protection of the Environment Operations Act 1997
Proponent	NSW Health Infrastructure

Abbreviation	Description
REF	Review of Environmental Factors
RF Act	Rural Fires Act 1997
RFS	Rural Fire Service
SEPP	State Environmental Planning Policy
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
Planning Systems SEPP	State Environmental Planning Policy – (Planning Systems) 2021
SIS	Species Impact Statement
WM Act	Water Management Act 2000

Executive Summary

The Proposal

This Review of Environmental Factors (REF) has been prepared by Urbis on behalf of NSW Health Infrastructure (HI) for the determination of the proposed development activity under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act)

This Review of Environmental Factors (REF) has been prepared by Urbis Pty Ltd on behalf of Health Infrastructure (HI). It involves primarily internal fit-out works to the existing ambulatory care building for a community health services building at Griffith Base Hospital located at 5-39 Animoo Avenue, Griffith, also referred to as 1 Noorebar Avenue. The purpose of this REF is to describe the proposed works, to document the likely environmental impacts and to detail mitigation measures that will be implemented.

This REF has been prepared in accordance with the requirements of all potentially relevant NSW and Commonwealth legislation including clause 171 of the Environmental Planning and Assessment Regulation 2021 (EP&A Reg). In doing so it satisfies Section 5.5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), which requires the Proponent to examine and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the activity.

The Proponent (Health Infrastructure) is the determining authority for the project under Part 5 of the EP&A Act.

The proposed REF works are required to repurpose the existing redundant ambulatory care hub building to a community health building. Specifically, the REF scope includes:

- Minor internal removal and fit out works including:
 - Removal of internal floor finishes
 - Modification of the existing oncology chair bay area into community health interview rooms
 - Alterations to a treatment room and waiting room
 - Alterations to a meeting area within the open office
- Removal of a portion of the existing covered walkway
- Install three new entry signs that indicate 'Community Health'
- Soffit and landscaping enhancements.

Options Considered

Following the completion of the Clinical Services Building and subsequent relocation of the existing ambulatory care services to the new building, the existing Ambulatory Care hub will be adapted and repurposed for a community health services building.

As the former ambulatory care services represents a clear option for re-use for the community health services building (without the need to construct an additional building on site), no other options were investigated.

The 'Do Nothing' approach would result in an unused building within the Griffith Hospital site. The proposed fit-out will replace the ambulatory health building with a community health building that will benefit the Griffith community. The new facility will provide a range of health services for the community.

Site Details

The development site is located on the broader Griffith Hospital site located at 5-39 Animoo Avenue, Griffith and is legally described as Lot 2 DP1043580. The Griffith Hospital site is located approximately 500m north of the Griffith Town Centre and is an irregular shaped parcel of land occupying an area of approximately 6.4 hectares. The particular area of the development is located in the southern portion of the broader site.

State significant development application (SSD-9838218) was approved in October 2021 for the construction of a new four-storey hospital building, demolition of remaining buildings vacated after commissioning of the new hospital, site works including roads and on-grade car parking, landscaping and signage.

Construction has commenced on the site in accordance with SSD-9838218.

Planning Approval Pathway

State Environmental Planning Policy (*Transport and Infrastructure*) 2021 (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the Transport and Infrastructure SEPP outlines the approval requirements for health service facilities.

The site is zoned R1 General Residential under the *Griffith Local Environmental Plan 2014*. The R1 General Residential zone is a prescribed zone under the Transport and Infrastructure SEPP.

The proposal involves the alteration of a building that is a *health services facility* which is classified as ‘development without consent’ pursuant to Clause 2.61 of the Transport and Infrastructure SEPP.

2.61 Development permitted without consent

(1) Any of the following development may be carried out by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility—

- (a) the erection or alteration of, or addition to, a building that is a health services facility,
- (b) development for the purposes of restoring or replacing accommodation or administration facilities,
- (c) demolition of buildings carried out for the purposes of a health services facility,
- (d) development for the purposes of patient transport facilities, including helipads and ambulance facilities,
- (e) development for the purposes of car parks to service patients or staff of, or visitors to, the health services facility (or to service staff of, or visitors to, other premises within the boundaries of the facility).

The project becomes an ‘activity’ for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment (REF). The proposal is considered an ‘activity’ in accordance with clause 5.1 of the EP&A Act because ‘the carrying out of a work’, is explicitly referenced under the definition of ‘activity’ in clause 5.1(1)(d).

Statutory Consultation

The Council and adjoining property occupiers were notified under Division 10 (Clause 2.62) of the *State Environmental Planning Policy (Transport and Infrastructure)* 2021 (Transport and Infrastructure SEPP) as the proposal involves the alteration of, or addition to, a building that is a health services facility. There are no other consultation requirements under Division 1 of the Transport and Infrastructure SEPP.

No (0) responses were received from Council and adjoining occupiers.

Environmental Impacts

As part of its obligations under Section 5.5 of the EP&A Act, Health Infrastructure is required to take into account, to the fullest extent possible, all matters likely to affect the environment. To comply with this obligation, a wide range of potential environmental impacts have been assessed for this REF. Where considered necessary, mitigation measures have been proposed to ensure that the impacts of the proposed works are no more than minor.

Justification and Conclusion

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the activity, it is determined that:

- The extent and nature of potential impacts will not have significant adverse effects on the locality, community and the environment.

- Potential impacts can be appropriately mitigated and managed to ensure that there is minimal effect on the locality and community.
- The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an Environmental Impact Statement (EIS) to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5.1 of the EP&A Act.
- The proposed development will not have any effect on matters of national significance and approval of the activity under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 is not required.
- There are no separate approvals, authorisations or notifications required in relation to the proposed development activity prior to determination under Part 5 of the EP&A Act or under any other Acts.

On this basis it is recommended that Health Infrastructure approve the proposed activity in accordance with Part 5 of the EP&A Act and subject to adoption and implementation of matters outlined in Section 6.3.

1. Introduction

This Review of Environmental Factors (REF) has been prepared by Urbis Pty Ltd on behalf of Health Infrastructure (HI) with respect to the proposed fit-out works to the community health building at Griffith Base Hospital located at 5-39 Animoo Avenue, Griffith, also referred to as 1 Noorebar Street. The purpose of this REF is to describe the proposed works, to document the likely environmental impacts and to detail mitigation measures that will be implemented.

This REF has been prepared in accordance with the requirements of all potentially relevant NSW and Commonwealth legislation including clause 171 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Reg). In doing so it satisfies section 5.5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), which requires the Proponent to examine and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the activity. The Proponent is the determining authority for the project under Part 5 of the EP&A Act. This REF has been prepared in accordance with the Department of Planning and Environment Guidelines for Division 5.1 Assessments (June 2022).

1.1 Proposal Identification

The proposed REF works are required to repurpose the existing and redundant ambulatory care hub building to a community health building. Specifically, the REF scope includes:

- Minor internal removal and fit out works including:
 - Removal of internal floor finishes
 - Modification of the existing oncology chair bay area into community health interview rooms
 - Alterations to a treatment room and waiting room
 - Alterations to a meeting area within the open office
- Removal of a portion of the existing covered walkway
- Install three new entry signs that indicate 'Community Health'
- Soffit and landscaping enhancements.

The REF works are considered 'development without consent' under clauses 2.61 of *State Environmental Planning Policy (Transport and Infrastructure) 2021*. The works become an 'activity' for the purposes of Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and are subject to an environmental assessment (Review of Environmental Factors).

1.2 Site Location

The development site is located on the broader Griffith Hospital site located at 5-39 Animoo Avenue, Griffith and is legally described as Lot 2 DP1043580. The Griffith Hospital site is located approximately 500m north of the Griffith Town Centre and is an irregular shaped parcel of land occupying an area of approximately 6.4 hectares. The particular area of the development is located in the southern portion of the broader site.

1.3 Purpose of the Report

This Review of Environmental Factors (REF) has been prepared by Urbis on behalf of NSW Health Infrastructure (HI) to determine the environmental impacts of the proposed community health building at Griffith Base Hospital. For the purposes of these works, HI is the proponent and the determining authority under Part 5 of the EP&A Act.

The purpose of the REF is to describe the proposal, to document the likely impacts of the proposal on the environment and to detail protective measures to be implemented to mitigate impacts.

The description of the proposed works and associated environmental impacts have been undertaken in the context of clause 171 of the EP&A Regulation and the Australian Government's Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

The assessment contained within the REF has been prepared having regard to:

- whether the proposed activity is likely to have a significant impact on the environment and therefore the necessity for an EIS to be prepared and approval to be sought from the Minister for Planning under Part 5.1 of the EP&A Act; and
- the potential for the proposal to significantly impact Matters of National Environmental Significance (MNES) on Commonwealth land and the need to make a referral to the Australian Government Department of Environment and Energy for a decision by the Commonwealth Minister for the Environment on whether assessment and approval is required under the EPBC Act.

The REF helps to fulfil the requirements of section 5.5 of the EP&A Act, which requires that HI examine, and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the proposed activity.

2. Site Analysis and Description

2.1 The Site and Locality

Griffith is a major regional city in the Riverina area of New South Wales, located approximately 570km west of Sydney, 360km north-west of Canberra, and 180km north-west of Wagga Wagga. It has a population of approximately 26,000 people however it services a far greater population catchment area. It is within the Murrumbidgee Local Health District (MLHD).

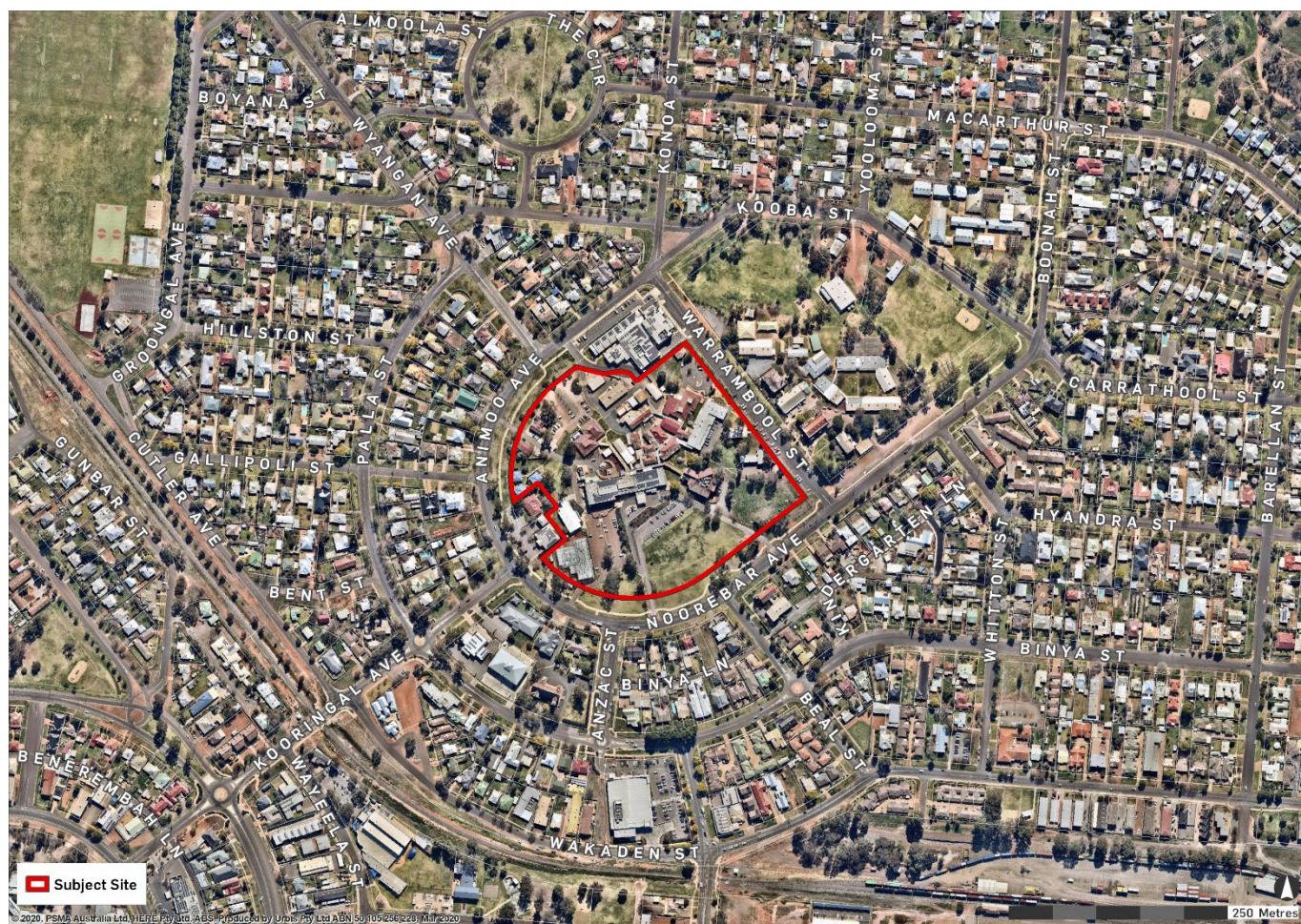
Griffith can be accessed by road from Sydney and Canberra via the Hume Highway and the Burley Griffin Way and from Melbourne via the Newell Highway. The population has a strong multi-cultural community and attracts tourists and backpackers throughout the year. Griffith is the third largest centre for education in the Riverina after Wagga Wagga and Leeton, with three high schools, 13 primary schools and various day care and pre-school facilities. Griffith also has one of the largest campuses of Riverina TAFE.

Figure 1 – Site context



Source: Nearmaps / Urbis

Figure 2 – Aerial view of Site



Source: Nearmaps / Urbis

The development site is located on the broader Griffith Hospital site located at 5-39 Animoos Avenue, Griffith and is legally described as Lot 2 DP1043580. The Griffith Hospital site is located approximately 500m north of the Griffith Town Centre and is an irregular shaped parcel of land occupying an area of approximately 6.4 hectares. The particular area of the development is located in the southern portion of the broader site.

The site is situated mid-slope on a hill which slopes down at approximately 3° to the south (Noorebar Avenue), with a portion falling toward the north-west corner to Animoos Avenue.

2.1.1 Existing Development

State significant development application (SSD-9838218) was approved in October 2021 for the construction of a new four-storey hospital building, demolition of remaining buildings vacated after commissioning of the new hospital, site works including roads and on-grade car parking, landscaping and signage.

Construction has commenced on the site and preparatory excavation for the construction process now underway.

Figure 3 – Photograph of the existing development



Source: ADCO/ Google Street View

2.1.2 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 7031/2022 dated 28/07/2022 identifies that the site is located within the R1 General residential zone under *Griffith Local Environmental Plan 2014*.

Table 1: Section 10.7 Planning Constraints

Affectation	Yes	No
Conservation area		✓
Item of environmental heritage	✓	
Affected by section 38 or 39 of the Coastal Management Act 2016 (CM Act)		✓
Proclaimed to be in a mine subsidence district		✓
Affected by a road widening or road realignment		✓
Affected by a planning agreement		✓
Affected by a policy that restricts development of land due to the likelihood of landslip		✓
Affected by bushfire, tidal inundation, subsidence, acid sulphate or any other risk		✓
Affected by any acquisition of land provision		✓
Biodiversity certified land or subject to any bio-banking agreement or property vegetation plan		✓
Significantly contaminated		✓
Subject to flood related development controls		✓

2.2 Surrounding Development

The site is located in a largely suburban context. The hospital is bounded by a mix of low-density dwellings along Noorebar and Aminoo Avenues and Sacred Heart Catholic Church, St. Alban's Anglican Cathedral and St Patricks

School along Warrambool Street. Further to the north, approximately 3km from the site, is Griffith City Airport which provides daily flights to Melbourne and Sydney.

The site is approximately 500m from Banna Avenue, the main street of Griffith. The main street comprises a mix of retail and commercial developments. At the western-most edge of the city centre is Griffith Regional University Study Centre which is located on the TAFE NSW Riverina Institute Griffith Campus.

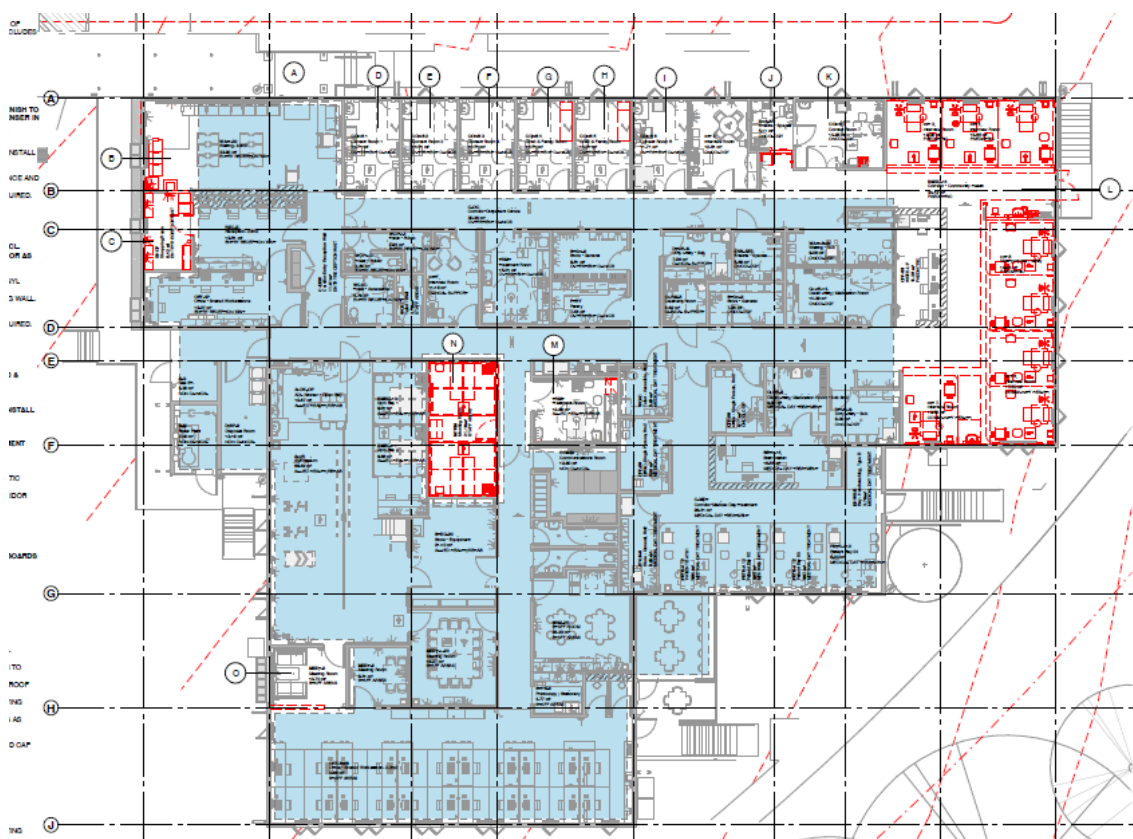
3. Proposed Development, Need and Alternative

3.1 The Proposal

The proposed REF works are required to repurpose the existing redundant ambulatory care hub building to a community health building. Specifically, the REF scope includes:

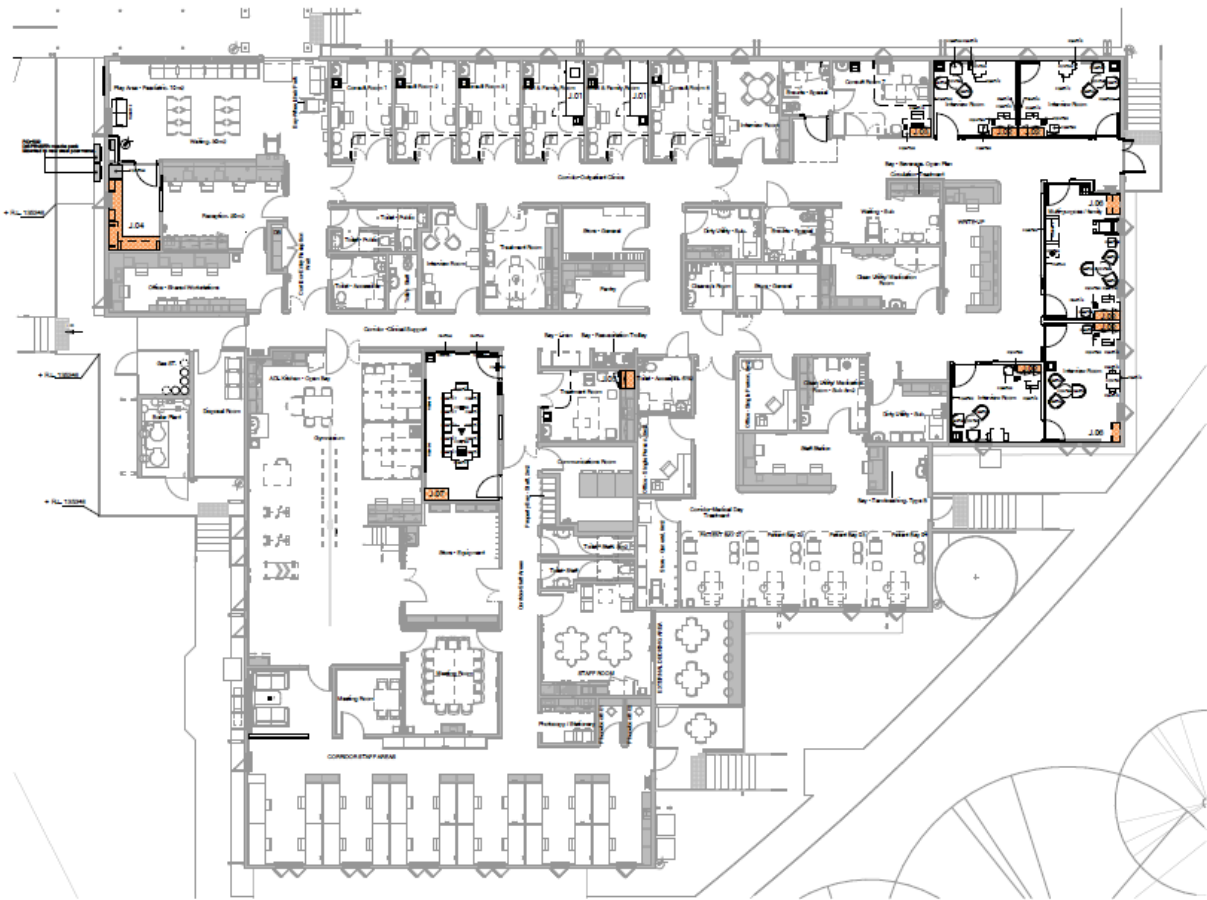
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 - Removal of internal floor finishes
 - Modification of the existing oncology chair bay area into community health interview rooms
 - Alterations to a treatment room and waiting room
 - Alterations to a meeting area within the open office
- Removal of a portion of the existing covered walkway
- Install three new entry signs that indicate 'Community Health'
- Soffit and landscaping enhancements.

Figure 4 – Demolition Plan



Source: DJRD Architects

Figure 5 – Internal Fit Out Plan



Source: DJRD Architects

3.1.1 Options Considered

Following the completion of the Clinical Services Building and subsequent relocation of the existing ambulatory care services to the new building, the existing Ambulatory Care Hub will be adapted and repurposed for community health services building.

As the former ambulatory care services represents a clear option for re-use for the community health services building (without the need to construct an additional building on site), no other options were investigated.

The ‘Do Nothing’ approach would result in an unused building within the Griffith Hospital site. The proposed fit-out will replace the redundant ambulatory health building with a community health building that will benefit the Griffith community. The new facility will provide a range of health services for the community.

3.2 Construction Activities

The works are short term.

Table 2: Project Timeframes and Construction Activities

Commencement Date	September 2024 to March 2025
Work Duration/Methodology	5 months

Work Hours and Duration/Construction	<p>All works will be undertaken during approved SSD-9838218 construction hours. Per Condition C4 of SSD-9838218, the construction hours are:</p> <p>(a) between 7am and 6pm, Mondays to Fridays inclusive; and</p> <p>(b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.</p>
Plant Equipment	Forklift, Elevated Work Platforms
Earthworks	Nil
Source and Quantity of Materials	Nationwide supply of steel, plasterboard, services and FFE
Affected by a planning agreement	No
Traffic Management and Access	Access through existing car park area

4. Statutory Framework

4.1 Planning Approval Pathway

Section 4.1 of the EP&A Act states that if an EPI provides that development may be carried out without the need for development consent, a person may carry the development out, in accordance with the EPI, on land to which the provision applies. However, the environmental assessment of the development is required under Part 5 of the Act.

State Environmental Planning Policy (*Transport and Infrastructure*) 2021 (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the Transport and Infrastructure SEPP outlines the approval requirements for health service facilities.

The site is zoned R1 General Residential under the *Griffith Local Environmental Plan 2014*. The R1 General Residential zone is a prescribed zone under the Transport and Infrastructure SEPP.

The relevant provision within Division 10 that determines the planning pathway is Clause 2.61, as follows:

2.61 Development permitted without consent

(1) Any of the following development may be carried out by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility—

- (a) the erection or alteration of, or addition to, a building that is a health services facility,*
- (b) development for the purposes of restoring or replacing accommodation or administration facilities,*
- (c) demolition of buildings carried out for the purposes of a health services facility,*
- (d) development for the purposes of patient transport facilities, including helipads and ambulance facilities,*
- (e) development for the purposes of car parks to service patients or staff of, or visitors to, the health services facility (or to service staff of, or visitors to, other premises within the boundaries of the facility).*

(2) This section does not permit the erection of any building that exceeds 15 metres in height or is located closer than 5 metres to any property boundary (or an addition to a building resulting in the building exceeding that height or being closer than that distance to any property boundary).

In respect to Clause 2.61(1)(a) above, the proposal involves the alteration of a building that is a *health services facility*. In respect to Clause 2.61(2) above, the proposal does not involve the erection of a building exceeding 12m in height, or result in the building being located closer than 5m to a property boundary. Accordingly, the proposal can be classified as 'development without consent', consistent with clause 2.61 of the Transport and Infrastructure SEPP.

The project becomes an 'activity' for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment (REF). The proposal is considered an 'activity' in accordance with clause 5.1 of the EP&A Act because 'the carrying out of a work', is explicitly referenced under the definition of 'activity' in Clause 5.1(1)(d).

4.2 Environmental Planning and Assessment Act 1979

Section 5.5 of the EP&A Act requires determining authorities, when assessing under Part 5, to examine and take into account to the fullest extent possible all matters affecting, or likely to affect the environment by reason of that activity.

Section 7 of this REF includes an assessment of the proposed activity against the requirements of section 5.5 of the EP&A Act.

4.3 Environmental Planning and Assessment Regulation 2021

Clause 171 of the EP&A Regulation provides a list of factors that must be taken into account for an environmental assessment under Part 5 of the EP&A Act. These requirements are considered at section 7 of this REF report.

4.4 Environmental Protection and Biodiversity Conservation Act 1999

Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is the Australian Government's environmental legislation. It covers environmental assessment and approvals, protects significant biodiversity and integrates the management of important natural and cultural places.

The proposal involves internal fit-out works, minor (above ground) external works, and does not involve any land disturbance or disturbance of vegetation. Accordingly, no additional studies are required for further environmental assessment.

4.5 State Environmental Planning Policies

The following SEPPs are applicable to the proposed activity:

State Environmental Planning Policy (Transport and Infrastructure) 2021

State Environmental Planning Policy (Transport and Infrastructure) 2021 aims to streamline the delivery of necessary services and infrastructure to communities through establishing alternate planning mechanisms and approval pathways.

Several divisions of the Transport and Infrastructure SEPP are aimed at streamlining the delivery of infrastructure carried out by, or on behalf of, a public authority. Health Infrastructure is a 'Public Service agency' and accordingly is the determining authority of the REF.

As noted in Section 4.1 above, the alterations to an existing health services facility may be carried out without development consent under clause 2.61 of the Transport and Infrastructure SEPP (specifically clause 2.61(a)) and therefore comprises an 'activity' under Part 5 of the EP&A Act. Relevant thresholds and requirements associated with consultation with authorities under both Division 1 (General consultation requirements) and also Division 10 (consultation requirements associated with health services facilities) is addressed in Section 6 of this REF.

State Environmental Planning Policy (Resilience and Hazards) 2021

State Environmental Planning Policy (Resilience and Hazards) 2021 provides a state-wide planning approach for the remediation of land and determining whether a development is a hazardous or offensive industry.

The proposed works involve the fit-out of a recently constructed building and do not involve any excavation works. Accordingly, no further contamination requirements are not triggered. Further, the proposal does not involve the storage of any hazardous and offensive goods of the specified quantity that would necessitate any further detailed assessment.

State Environmental Planning Policy (Sustainable Buildings) 2022

State Environmental Planning Policy (Sustainable Buildings) 2022 (Sustainable Buildings SEPP) commenced on 1 October 2023 to encourage the design and delivery of sustainable buildings and to monitor the embodied emissions of materials used in construction of buildings.

Per Clause 3.1 (1)(b) of the Sustainable Buildings SEPP, the SEPP applied to alterations of an existing building if the capital investment value is \$10 million. The capital investment value of the proposed works is less than \$10 million, therefore this SEPP does not apply.

State Environmental Planning Policy (Industry and Employment) 2021

State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP) has provisions to ensure that signage is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations, and is of high-quality design and finish.

Industry and Employment SEPP applies to all advertising signage that can be seen from a public place or public reserve except signage that is exempt development. An assessment of the proposed signage is provided in the table below.

Criteria	Assessment	Compliance
1 Character of the Area Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located? Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	The proposed signage is compatible with the existing and desired character of the broader hospital campus.	Yes
2 Special Areas Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The proposal is not located within an environmentally sensitive areas or a heritage conversation zone. The proposed signage will not have a negative impact on the heritage item on the site. The signage is located a fair distance from the heritage items on the site.	Yes
3 Views and vistas <i>Does the proposal obscure or compromise important views?</i> <i>Does the proposal dominate the skyline and reduce the quality of vistas?</i> <i>Does the proposal respect the viewing rights of other advertisers?</i>	The proposed signage is contained wholly within the building envelope and the building façade. The size and dimensions of the signage is consistent with the scale of the building and will not dominate the skyline.	Yes
4 Streetscape, setting or landscape <i>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</i> <i>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</i> <i>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</i> <i>Does the proposal screen unsightliness?</i> <i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i> <i>Does the proposal require ongoing vegetation management?</i>	The scale, form and proportion of the proposed signs are appropriate for the setting within the Griffith Hospital campus. The proposal does not require any ongoing vegetation management.	Yes
5 Site and Building <i>Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?</i>	The scale of the proposed signage zones is consistent with the scale of the building. The proposed signage is contained wholly on the building façade and does not protrude above the building or structures.	Yes

Does the proposal respect important features of the site or building, or both?

Does the proposal show innovation and imagination in its relationship to the site or building, or both?

6 Associated devices and logos with advertisements and advertising structures

No safety devices or platforms are proposed.

Yes

Have any safety devices, platforms, lighting, devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?

7 Illumination

The proposed signage is not illuminated.

Yes

Would illumination result in unacceptable glare?

Would illumination affect safety for pedestrians, vehicles or aircraft?

Would illumination detract from the amenity of any residence or other form of accommodation?

Can the intensity of the illumination be adjusted, if necessary?

Is the illumination subject to a curfew?

8 Safety

Would the proposal reduce the safety for any public road?

The proposed signage is located on the building facade and will not have any impacts on the safety of the surrounding public roads, pedestrians, or cyclists.

Yes

Would the proposal reduce the safety for pedestrians or bicyclists?

Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?

4.6 Local Environmental Plans

The *Griffith Local Environmental Plan 2014* (GLEP) is the principle planning instrument guiding development of land in Griffith. Under the GLEP, the site is zoned R1 General Residential. A hospital is defined as a *'health services facility'* and is permissible with consent in the R1 Zone.

As the proposed development is classified as *'development without consent'* under Clause 2.61 of the Transport and Infrastructure SEPP, this removes the requirement to seek development consent under the provisions of the GLEP 2014. Notwithstanding this, the provisions of the GLEP have been considered as required under Section 5.5 of the EP&A Act 1979 by taking into account to the fullest extent possible all matters likely to affect the environment by reason of that activity.

Figure 6 – Land zoning plan

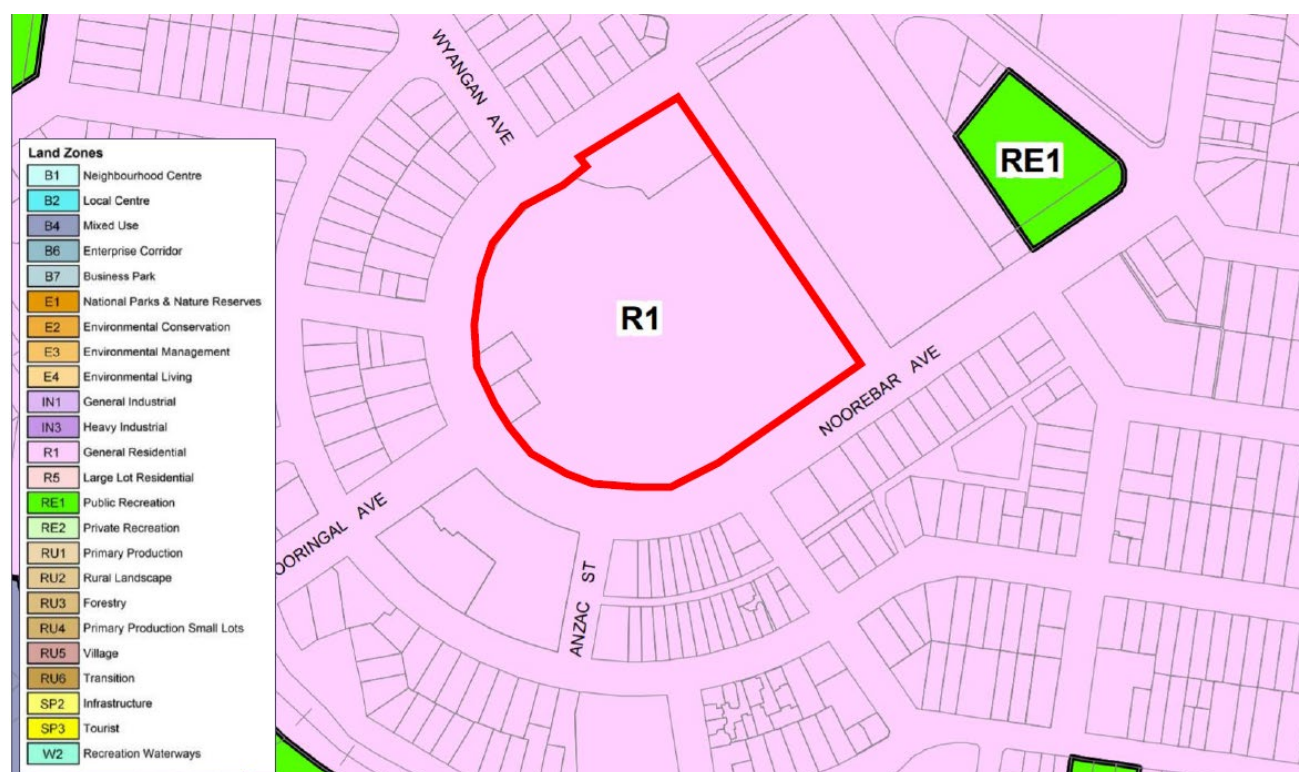


Table 3: Land Use Objectives

Land Use Zone Objectives	Consistency Assessment
<ul style="list-style-type: none"> To provide for the housing needs of the community. To provide for a variety of housing types and densities. To enable other land uses that provide facilities or services to meet the day to day needs of residents. To facilitate development of social and community infrastructure to meet the needs of future residents. To allow people to carry out a reasonable range of activities from their homes, if such activities do not adversely affect the living environment of neighbours. 	<p>The majority of the land use objectives for the R1 zone are relevant to residential development. Notwithstanding this, health service facilities are permissible with consent in the R1 zone.</p> <p>The proposed fit out will replace the function of the former ambulatory health building and replace it with a community health building that will provide a range of health services and associated benefits for the Griffith community.</p>

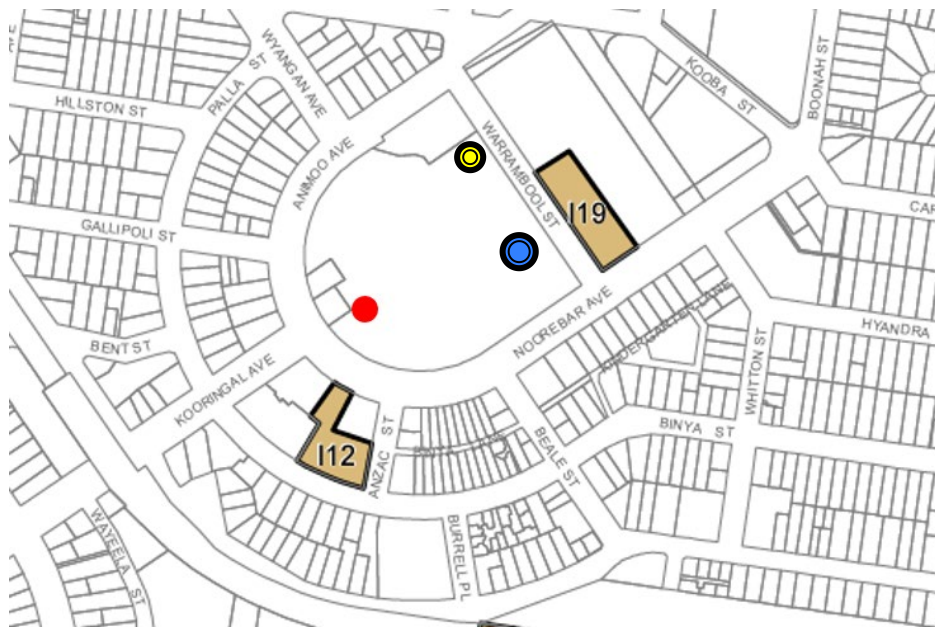
Table 4: Key LEP Provisions

Clause	Provision	Proposed	Complies
4.3 Height of buildings	N/A – there is no maximum building height.	No change to the maximum building height is proposed.	Yes

4.4 Floor space ratio	N/A – there is no maximum floor space ratio.	No additional floor space is proposed.	Yes
5.10 Heritage conservation	Conserve the environmental heritage of Griffith and the heritage significance of heritage items and heritage conservation areas.	<p>The hospital site contains a heritage item of local heritage significance and is known as <i>Item 2 – Former Matron’s House and Nurses’ Quarters at Base Hospital</i>.</p> <p>The site is also located opposite Item 19 - Sacred Heart Catholic Church, presbytery, convent and hall and Item 12 - St Alban’s Anglican Cathedral and Hall.</p> <p>The proposal primarily involves internal works. The minor nature of the external works and the significant distance from the listed heritage item on site and the lack of contextual relationship with this item allows an acceptable outcome from a heritage viewpoint.</p> <p>The location of the community health building in relation to the heritage items is shown on the plan below.</p>	Yes
7.1 Earthworks	Ensure earthworks will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.	N/A no earthworks are proposed.	N/A
7.2 Flood planning	Minimise flood risk to life and property associated with the use of land.	N/A the site is not identified as flood prone.	Yes
7.8 Airspace operations	Provide for the effective and ongoing operation of the Griffith Airport by ensuring that such operation is not compromised by development that penetrates the Limitation or Operations Surface for that airport.	The proposed development will not penetrate the Limitation or Operations Surface for the airport.	Yes
7.9 Development in areas subject to aircraft noise	This clause applies to development that— (a) is on land that— (i) is near the Griffith Airport, and (ii) is in an ANEF contour of 20 or greater, and (b) the consent authority considers is likely	The site is not within an ANEF contour of 20 or greater.	Yes

to be adversely affected by
aircraft noise

Figure 7 – Griffith LEP 2014 – Heritage Map



Source: Griffith LEP 2014

The location of the demolished Matron's House edged in yellow and the Nurses' Quarters are marked in blue. The location of the community health building is shown in red.

4.7 Other Relevant Legislation

Legislation	Comment	Relevant
Environment Protection and Biodiversity Act 1999	The proposed internal fit out works and minor external works will not have any impacts upon any Matters of National Environmental Significance. Commonwealth approval is therefore not required.	No
Protection of the Environment Operations Act 1997 (POEO Act)	The proposed internal fit out works and minor external works is not a scheduled development or a scheduled activity and therefore does not require an Environment Protection Licence (EPL) under the POEO Act.	No
Biodiversity Conservation Act 2016	The proposed internal fit out works and minor external works will have no affects upon threatened species, populations or ecological communities, or their habitats.	No
Heritage Act 1977	The proposed internal fit out works and minor external works will not affect any item of State Heritage	No

significance. Further, the proposal has no impact on the local heritage item on listed and nearby local items.

National Parks and Wildlife Act 1974	No excavation works are proposed, and therefore no impacts associated with the National Parks and Wildlife Act will occur.	No
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Contaminated Land Management Act 1997	No excavation is proposed and therefore no impacts associated with the Contaminated Land Management Act 1997 will occur.	No
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5. Consultation

5.1 Government Agency and Other Stakeholder Consultation

Relevant consultation thresholds are identified in Division 1 of the Transport and Infrastructure SEPP (general consultation requirements) and also Division 10 (consultation requirements associated with health services facilities). Each of these Divisions are addressed below.

Division 1 sets out the general consultation requirements identified in Clauses 2.10-2.17. This confirms the nature of the proposal does not trigger any requirements for consultation with authorities, as detailed in Table 6 below.

Table 5: Transport and Infrastructure SEPP 2021 Clauses 2.10 – 2.17 Consultation

Consultation with Council – cl 2.10, Council related infrastructure or services	Yes	No
Will the activity:		
a. Potentially have a substantial impact on stormwater management services provided by the Council?		✓
b. Be likely to generate traffic that will strain the capacity of the road system in the LGA?		✓
c. Involve connection to, and have a substantial impact on, the capacity of any part of a sewerage system owned by Council?		✓
d. Involve connection to and use a substantial volume of water from any part of a water supply system owned by Council?		✓
e. Involve the installation of a temporary structure on, or enclosing of, a public place that is under the Council's management or control that is likely to cause a disruption to pedestrian or vehicular traffic that is not minor or inconsequential?		✓
f. Involve the excavation that is not minor or inconsequential of the surface of, or a footpath adjacent to, a road for which the Council is the roads authority under the <i>Roads Act 1993</i> (if the public authority that is carrying out the development, or on whose behalf it is being carried out, is not responsible for the maintenance of the road or footpath).		✓
Consultation with Council – cl 2.11 local heritage	Yes	No
Is it likely that the activity will have an impact, that is not minor or inconsequential, on a local heritage item (other than a local heritage item that is also a State heritage item) or a heritage conservation area?		✓
Consultation with Council – cl 2.11, local heritage	Yes	No
If yes to cl 14(1) above, has a copy of the Heritage Impact Statement and a scope of works been provided to the Council?		✓
Consultation with Council – cl 2.12, flood liable land	Yes	No
Will the works be located on flood liable land and will they alter flooding patterns more than to a minor extent?		✓
Consultation with State Emergency Service— cl 2.13 development with impacts on flood liable land	Yes	No
Is the activity located on flood liable land and greater than minor alterations or additions to, or the demolition of, a building, emergency works or routine maintenance?		✓
Consultation with councils—2.14 development with impacts on certain land within the coastal zone	Yes	No
Is the activity on land that is within a coastal vulnerability area and is inconsistent with a certified coastal management program that applies to that land?		✓
Consultation with public authorities other than councils – cl 2.15	Yes	No
Will the activity be located:		

g.	on or adjacent to land reserved under the <i>National Parks and Wildlife Act 1974</i> ?	✓
h.	adjacent to a marine park declared under the <i>Marine Parks Act 1997</i> ?	✓
i.	adjacent to an aquatic reserve declared under the <i>Marine Estate Management Act 2014</i> ?	✓
j.	in the foreshore area within the meaning of the <i>Sydney Harbour Foreshore Authority Act 1998</i> ?	✓
k.	In association with development comprising a fixed or floating structure in or over navigable waters?	✓
l.	In association with development for the purposes of a health services facility – in an area that is bush fire prone land (as defined by the Act)?	✓
m.	In association with development that may increase the amount of artificial light in the night sky and that is on land within the dark sky region as identified on the dark sky region map—the Director of the Observatory, Note. The dark sky region is land within 200 kilometres of the Siding Spring Observatory.	✓
n.	development on defence communications facility buffer land within the meaning of clause 5.15 of the Standard Instrument—the Secretary of the Commonwealth Department of Defence, Note. Defence communications facility buffer land is located around the defence communications facility near Morundah. See the Defence Communications Facility Buffer Map referred to in clause 5.15 of <i>Lockhart Local Environmental Plan 2012</i> , <i>Narrandera Local Environmental Plan 2013</i> and <i>Urana Local Environmental Plan 2011</i> .	✓
o.	development on land in a mine subsidence district within the meaning of the <i>Mine Subsidence Compensation Act 1961</i> —the <i>Mine Subsidence Board</i> .	✓

Division 10 of the Transport and Infrastructure SEPP identifies the following in respect of Health services facilities and associated consultation requirements (**our emphasis added**):

2.61 Development permitted without consent

(1) *Any of the following development may be carried out by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility—*

(a) the alteration of, or addition to, a building that is a health services facility,

(b) development for the purposes of restoring or replacing accommodation or administration facilities,

(c) demolition of buildings carried out for the purposes of a health services facility,

(d) development for the purposes of patient transport facilities, including helipads and ambulance facilities,

(e) development for the purposes of car parks to service patients or staff of, or visitors to, the health services facility (or to service staff of, or visitors to, other premises within the boundaries of the facility).

(2) *This section does not permit the erection of any building that exceeds 15 metres in height or is located closer than 5 metres to any property boundary (or an addition to a building resulting in the building exceeding that height or being closer than that distance to any property boundary).*

2.62 Notification of carrying out of certain development without consent

(1) **This section applies to development carried out by or on behalf of a public authority under section 2.61(1) (other than section 2.61(1)(b) or (c)).**

(2) *Before development to which this section applies is carried out, the person carrying out the development or the public authority concerned must—*

(a) give written notice of the intention to carry out the development to each of the following—

(i) the council for the area in which the relevant land is located (unless the public authority is the council),

(ii) the occupiers of any adjoining land, and

(b) take into consideration any response to the notice that is received within 21 days after the notice is given.

(3) In this section, relevant land means the land on which the development is proposed to be carried out.

Table 6: Notification of carrying out certain development without consent (Transport and Infrastructure SEPP clause 2.62)

Notification of carrying out certain development without consent (cl 2.62)	Yes	No
Is the proposed activity [if yes to any of the activities below, go to requirements under cl 2.62]		
cl 2.61(1)(a) the alteration of, or addition to, a building that is a health services facility	✓	
cl 2.62(2) (a) Has written notice of the intention to carry out the development to each of the following been issued? (i) the council for the area in which the relevant land is located (unless the public authority is the council) (ii) the occupiers of any adjoining land	✓	
cl 2.62(2)(b) Has any response to the notice at cl 2.62(2)(a) been taken into consideration under this REF assessment?	✓	

In accordance with clause 2.62 above, before development to which clause 2.61(1) (other than 2.61(1)(b) or (c)) applies, the person carrying out the development must give written notice to the council and occupiers of adjoining land. The public authority must take into consideration any response to the notice that is received within 21 days after the notice is given. As the proposal involves development under Clause 2.61(1)(a), notification is required.

Formal notification letters were issued to occupiers of adjoining land on 30th November 2022 and Council on 7th December 2022, refer to Appendix J. No (0) responses were received.

6. Environmental Impact Assessment

6.1 Identification of Issue

6.1.1 Soils and Geology

Questions to consider	Yes	No
Will the works require land disturbance?		✓
Are the works within a landslip area?		✓
Are the works within an area of high erosion potential?		✓
Could the works disturb any natural cliff features, rock outcrops or rock shelves?		✓
Will the works result in permanent changes to surface slope or topography?		✓
Are there acid sulphate soils within or immediately adjacent to the boundaries of the work area? And could the works result in the disturbance of acid sulphate soils?		✓
Are the works within an area affected by salinity?		✓
Is there potential for the works to encounter any contaminated material?		✓

The proposal involves internal fit-out works, minor (above ground) external works and does not involve any land disturbance. Accordingly, no additional studies are required for further environmental assessment.

6.1.2 Hazardous Materials and Contamination

Questions to consider	Yes	No
Is there potential for the works to encounter any contaminated material?		✓
Will the works involve the disturbance or removal of asbestos?		✓
Is the work site located on land that is known to be or is potentially contaminated?		✓
Is a Remediation Action Plan required?		✓
Is the work category 2 works under SEPP 55?		✓

The proposal involves internal fit-out works, minor (above ground) external works of a recently constructed building and does not involve any land disturbance. Accordingly, no additional studies are required for further environmental assessment.

6.1.3 Hydrology, Flooding and Water Quality

Questions to consider	Yes	No
Are the works located near a natural watercourse?		✓
Are the works located within a floodplain?		✓
Will the works intercept groundwater?		✓
Will a licence under the Water Act 1912 or the Water Management Act 2000 be required?		✓

The proposal involves internal fit-out works, minor (above ground) external works, and does not involve any interface with natural watercourses or groundwater. Further, the site is not located within a floodplain. Accordingly, no additional studies are required for further environmental assessment.

Bulk catchment plans for the Griffith Base Hospital redevelopment (SSD-9838218) showed that the post-development impervious areas are less than the pre-development impervious areas. The Stormwater Assessment for the Griffith Base Hospital redevelopment also showed less post-development flows to both Noorebank Avenue and Animoo Avenue, during different ARIs up to 100yr storm event. The project stormwater engineer has confirmed that the proposed refurbishment works to the Community Health Building will not impact stormwater calculations carried out for the Section 68 Approval. Therefore, the proposed refurbishment works are not expected to have an impact on the stormwater quality or quantity at the site.

6.1.4 Ecology

Questions to consider	Yes	No
Could the works affect any Environmental Protection and Biodiversity Conservation Act 1999 (Cth) listed threatened species, ecological community or migratory species?		✓
Is it likely that the activity will have a significant impact in accordance with the Biodiversity Conservation Act (2016)? In order to determine if there is a significant impact REF report must address relevant requirements of clause 7.2 of the BC Act:		✓
<ul style="list-style-type: none"> • Clause 7.2 (a) - Test for significant impact in accordance with clause section 7.3 of the BC Act. • Clause 7.2 (c) it is carried out in a declared area of outstanding biodiversity value. 		
Could the works affect a National Park or reserve administered by EES?		✓
Is there any important vegetation or habitat (i.e. SEPP 9 Urban Bushland, SEPP 14 Wetlands, SEPP 26 Littoral Rainforest) within or adjacent to the work area?		✓
Could the works impact on any aquatic flora or habitat (i.e. seagrasses, mangroves)?		✓
Are there any noxious or environmental weeds present within the work area?		✓
Will clearing of native vegetation be required?		✓

The proposal involves internal fit-out works, minor (above ground) external works, and does not involve any land disturbance or disturbance of vegetation. Accordingly, no additional studies are required for further environmental assessment.

6.1.5 Bushfire Prone Land

Questions to consider	Yes	No
Are the works located on bushfire prone land		✓
Do the works include bushfire hazard reduction work?		✓
Is the work consistent with a bush fire risk management plan within the meaning of the Rural Fires Act 1997 (RF Act) that applies to the area or locality in which the activity is proposed to be carried out?		✓

The proposal involves internal fit-out works, minor (above ground) external works, and is not located on bushfire prone land or other similar bushfire affectations. Accordingly, no additional studies are required for further environmental assessment.

6.1.6 Traffic, Access and Parking

Questions to consider	Yes	No
Will the works affect traffic or access on any local or regional roads?		✓
Will the works disrupt access to private properties?		✓
Are there likely to be any difficulties associated with site access?		✓
Are the works located in an area that may be highly sensitive to movement of vehicles or machinery to and from the work site (i.e. schools, quiet streets)?		✓
Will full or partial road closures be required?		✓
Will the proposal result in a loss of onsite car parking?		✓
Is there onsite parking for construction workers?		✓

The proposal involves internal fit-out works and minor (above ground) external works. The proposal does not involve any increase in gross floor area, nor does it involve any loss or changes to the existing parking servicing the building.

Health Infrastructure have confirmed that the parking demand associated with the existing Ambulatory Care building will remain consistent with the change of use to a Community Health Building. The approved Traffic and Parking Statement (attached at Appendix H) concluded that the construction traffic impacts on the surrounding road network due to light vehicle movements to and from the site are negligible. Therefore the proposed minor construction works will not create additional unmanageable traffic impacts to the surrounding road network.

Accordingly, no additional studies are required for further environmental assessment.

6.1.7 Noise and Vibration

Questions to consider	Yes	No
Are there residential properties or other sensitive land uses or areas that may be affected by noise from the proposal during construction? (i.e. schools, nursing homes, residential areas or native fauna populations)?		✓
Will any receivers be affected by noise for greater than three weeks?		✓
Are there sensitive land uses or areas that may be affected by noise from the proposal during operation?		✓
Will the works be undertaken outside of standard working hours? Monday – Friday: 7am to 6pm Saturday: 8am to 1pm Sunday and public holidays: no work		✓
Will the works result in vibration being experienced by any surrounding properties or infrastructure?		✓

All works will be undertaken during approved SSD-9838218 construction hours. Per Condition C4 of SSD-9838218, the construction hours are:

- (a) between 7am and 6pm, Mondays to Fridays inclusive; and
- (b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.

6.1.8 Air Quality and Energy

Questions to consider	Yes	No
Could the works result in dust generation?		✓

Could the works generate odours (during construction or operation)	✓
Will the works involve the use of fuel-driven heavy machinery or equipment?	✓
Are the works located in an area or adjacent to land uses (e.g. schools, nursing homes) that may be highly sensitive to dust, odours, or emissions?	✓
Have energy use considerations been included in the project design?	✓

The Construction Methodology Plan at Appendix D states that to ensure dust is concealed within the work area, hoardings will be installed to the larger fit out areas with the smaller areas to use plastic zip walls. Dust extraction fans will be used as required.

6.1.9 Non-Aboriginal Heritage

Questions to consider	Yes	No
Are there any heritage items listed on the following registers within or in the vicinity of the work area? NSW heritage database (includes section 170 and local items) Commonwealth EPBC heritage list?		✓
Will works occur in areas that may have archaeological remains?		✓

The proposal involves internal fit-out works, minor (above ground) external works, and in any case does not have any interface or impact with the listed heritage item that is situated on broader site. Accordingly, no additional studies are required for further environmental assessment.

6.1.10 Aboriginal Heritage

Questions to consider	Yes	No
Will the works disturb any culturally modified trees?		✓
Are there any known items of Aboriginal heritage located in the works area or in the vicinity of the works area (e.g. previous studies or reports from related projects)?	✓	
Are there any other sources of information that indicate Aboriginal objects are likely to be present in the area (e.g. previous studies or reports from related projects)?	✓	
Will the works occur in the location of one or more of these landscape features and is on land not previously disturbed? <ul style="list-style-type: none"> Within 200m of waters. Located within a sand dune system. Located on a ridge top, ridge line or headland. Located within 200m below, or above a cliff face. Within 20m of, or in a cave, rock shelter or a cave mouth 		✓

The Aboriginal Cultural Heritage Assessment Report submitted with the SSDA for the Griffith Base Hospital Redevelopment found some Aboriginal objects across the site. An application for an Aboriginal Heritage Impact Permit has subsequently been prepared. The proposal involves internal fit-out works, minor (above ground) external works of a recently constructed building and does not involve any land disturbance. Accordingly, no additional studies are required for further environmental assessment.

6.1.11 Visual Amenity

Questions to consider	Yes	No
Are the works visible from residential properties, or other land uses that may be sensitive to visual impacts?		✓
Will the works be visible from the public domain?	✓	

Are the works located in areas of high scenic value?	✓
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Will the works involve night work requiring lighting?	✓
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The proposal involves internal fit-out works, minor (above ground) external works of a recently constructed low-scale building, and does not involve any land disturbance. Accordingly, no additional studies are required for further environmental assessment.

6.1.12 Land Uses and Services

Questions to consider	Yes	No
Will the works result in a loss of, or permanent disruption of an existing land use?		✓
Will the works involve the installation of structures or services that may be perceived as objectionable or nuisance?		✓
Will the works impact on, or be in the vicinity of other services?		✓

The proposal involves internal fit-out works, minor (above ground) external works of a recently constructed building where existing services are available and being relied upon for its continuing use. Accordingly, no additional studies are required for further environmental assessment.

6.1.13 Waste Generation

Questions to consider	Yes	No
Will the works result in the generation of non-hazardous waste?	✓	
Will the works result in the generation of hazardous waste?		✓
Will the works result in the generation of wastewater requiring off-site disposal?		✓

The Construction Methodology Plan at Appendix D outlines how waste generated through construction will be managed. Waste removed from site will be transported to an approved waste or recycling facility. All waste removed from site will be tracked through waste documents and/or monthly waste reports provided by the contractor. The on-site waste management strategies include:

- Waste products will be recycled wherever possible.
- Waste bins will be provided and emptied regularly.
- Waste unsuitable for recycling will be disposed of to an approved landfill.
- Tipping dockets will be obtained as required.
- Disposal of any solid and liquid waste will be by an approved contractor to an approved location.
- Stockpiles will be in areas approved by the Site Manager.
- Stockpiles will be managed to prevent pollution i.e. covered or sprayed etc.

6.1.14 Cumulative Impact

Questions to consider	Yes	No
Has there been any other development approved within 500m of the site?		✓
Will there be significant impacts (for example, including but not limited to, construction traffic impacts) from other development approved or currently under construction within 500m of the site?		✓

There have been no significant approvals or current development activity that relate to sites in the immediate vicinity (i.e. beyond the broader hospital site) that would contribute to any significant cumulative impacts.

Relative to the subject site itself, State significant development application (SSD-9838218) was approved in October 2021 for the construction of a new four-storey hospital building, demolition of remaining buildings vacated after commissioning of the new hospital, site works including roads and on-grade car parking, landscaping and signage. Construction has commenced on the site.

In effect, the cumulative impacts associated with the proposed activity relate to the approved main hospital works underway on the existing site. As the proposal involves minor fit-out works and the works associated with this fit-out as well as the main hospital works is being carried out by the same contractor, it is considered the ability to coordinate these works can be readily achieved and that any cumulative impact matters would be minimal. To assist in managing construction related impact associated with the proposal in the context of surrounding works being undertaken, a Construction Methodology Plan (CMP) has been provided at Appendix D.

6.2 Impact Assessment

This part of the REF provides an analysis of **all possible impacts** from the proposed activity and a description of **any proposed mitigation measures**.

6.2.1 Physical and Chemical Impacts During Construction and Operation

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. Is the proposal likely to impact on soil quality or land stability?	<input type="checkbox"/>	N/A	N/A	N/A
2. Is the activity likely to affect a waterbody, watercourse, wetland or natural drainage system?	<input type="checkbox"/>	N/A	N/A	N/A
3. Is the activity likely to change flood or tidal regimes, or be affected by flooding?	<input type="checkbox"/>	N/A	N/A	N/A
4. Is the activity likely to affect coastal processes and coastal hazards, including those projected by climate change (e.g. sea level rise)?	<input type="checkbox"/>	N/A	N/A	N/A
5. Does the activity involve the use, storage, or transport of hazardous substances or the use or generation of chemicals, which may build up residues in the environment?	<input type="checkbox"/>	N/A	N/A	N/A
6. Does the activity involve the generation or disposal of gaseous, liquid or solid wastes or emissions?	<input type="checkbox"/>	N/A	N/A	N/A

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
7. Will the activity involve the emission of dust, odours, noise, vibration or radiation in the proximity of residential or urban areas or other sensitive locations?	<input type="checkbox"/>	N/A	N/A	N/A
8. Is the activity likely to change flood or tidal regimes, or be affected by flooding?	<input type="checkbox"/>	N/A	N/A	N/A
9. Is the activity likely to affect coastal processes and coastal hazards, including those projected by climate change (e.g. sea level rise)?	<input type="checkbox"/>	N/A	N/A	N/A

6.2.2 Biological Impacts During Construction and Operation

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. Is any vegetation to be cleared or modified? (includes vegetation of conservation significance or cultural landscape value)	<input type="checkbox"/>	N/A	N/A	N/A
2. Is the activity likely to have a significant effect on threatened flora species, populations, or their habitats, or critical habitat (refer to threatened species assessment of significance under the BC Act)?	<input type="checkbox"/>	N/A	N/A	N/A
3. Does the activity have the potential to endanger, displace or disturb fauna (including fauna of conservation significance) or create a barrier to their movement?	<input type="checkbox"/>	N/A	N/A	N/A
4. Is the activity likely to have a significant effect on threatened fauna species, populations, or their habitats, or critical habitat (refer to threatened species assessment of significance BC Act)?	<input type="checkbox"/>	N/A	N/A	N/A
5. Is the activity likely to impact on an ecological community of conservation significance?	<input type="checkbox"/>	N/A	N/A	N/A
6. Is the activity likely to have a significant effect on an EEC or its habitat (refer to threatened species assessment of significance (BC Act 2016)?	<input type="checkbox"/>	N/A	N/A	N/A

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
7. Is the activity likely to cause a threat to the biological diversity or ecological integrity of an ecological community?	<input type="checkbox"/>	N/A	N/A	N/A
8. Is the activity likely to introduce noxious weeds, vermin, feral species or genetically modified organisms into an area?	<input type="checkbox"/>	N/A	N/A	N/A
9. Is the activity likely to affect critical habitat?	<input type="checkbox"/>	N/A	N/A	N/A
10. Is the activity consistent with any applicable recovery plans or threat abatement plans?	<input type="checkbox"/>	N/A	N/A	N/A
11. Is the activity likely to affect any joint management agreement entered into under the BC Act?	<input type="checkbox"/>	N/A	N/A	N/A

6.2.3 Community Impacts During Construction and Operation

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. Is the activity likely to affect community services or infrastructure?	<input type="checkbox"/>	Low	There is no impact as the services are relocating and not ceasing. The community health building that will provide a range of health services and associated benefits for the Griffith community.	N/A
2. Does the activity affect sites of importance to local or the broader community for their recreational or other values or access to these sites?	<input type="checkbox"/>	N/A	N/A	N/A
3. Is the activity likely to affect economic factors, including employment numbers or industry value?	<input type="checkbox"/>	N/A	N/A	
4. Is the activity likely to have an impact on the safety of the community?	<input type="checkbox"/>	Negligible	There are temporary, minimal potential impacts upon the safety of the community during construction works, however these potential impacts will be mitigated through the Construction Management Plan.	<p>Prior to the commencement of works, a notice will be provided and required to be signed off by the head of staff to confirm acceptable start time and acceptance to shutdown mechanical and fire systems during works.</p> <p>The NSW fire brigade will be notified of all shutdowns and when systems are back up and running. This is to prevent false fire alarms during works and ensure no spread of dusty air to other section of the facility. Fire egress paths will be maintained and modified where required in accordance with fire engineer and private certifying authority requirements. No works will</p>

				be undertaken until this is established and signed off.	
				Following works the foreman will ensure all areas are clean, including the adjacent car park, systems are up and running and the area is signed back over to the staff including the notification to NSWFB and any other authorities.	
5.	Is the activity likely to cause a bushfire risk?	<input type="checkbox"/>	N/A	N/A	N/A
6.	Will the activity affect the visual or scenic landscape? This should include consideration of any permanent or temporary signage.	<input type="checkbox"/>	Negligible	The proposed works are minor and are largely internal.	N/A
7.	Is the activity likely to cause noise, pollution, visual impact, loss of privacy, glare or overshadowing to members of the community, particularly adjoining landowners?	<input type="checkbox"/>	Negligible	The proposed works are minor and are largely internal.	The Construction Methodology Plan (Appendix D) details mitigation measures to minimise any construction impacts.

6.2.4 Natural Resource Impacts During Construction and Operation

		Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1.	Is the activity likely to result in the degradation of a park or any other area reserved for conservation purposes?	<input type="checkbox"/>	N/A	N/A	N/A
2.	Is the activity likely to affect the use of, or the community's ability to use, natural resources?	<input type="checkbox"/>	N/A	N/A	N/A

3.	Is the activity likely to involve the use, wastage, destruction or depletion of natural resources including water, fuels, timber or extractive materials? This should include opportunities to utilise recycled or alternative products.	<input type="checkbox"/>	N/A	N/A	N/A
4.	Does the activity provide for the sustainable and efficient use of water and energy? Where relevant to the proposal, this should include consideration of high efficiency fittings, appliances, insulation, lighting, rainwater tanks, hot water and electricity supply.	<input type="checkbox"/>	N/A	N/A	N/A

6.2.5 Aboriginal Cultural Heritage Impacts During Construction and Operation

Addressing matters 1–5 will assist in meeting requirements set out in OEH's **Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW**.

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. Will the activity disturb the ground surface or any culturally modified trees?	<input type="checkbox"/>	N/A	N/A	N/A
2. Does the activity affect known Aboriginal objects or Aboriginal places? Include all known sources of information on the likely presence of Aboriginal objects or places, including AHIMS search results.	<input type="checkbox"/>	Negligible	The Aboriginal Cultural Heritage Assessment Report submitted with the SSDA for the Griffith Base Hospital Redevelopment found some Aboriginal objects across the site. An application for an Aboriginal Heritage Impact Permit has subsequently been prepared. The proposal involves internal fit-out works, minor (above ground) external works of a recently constructed building and does not involve any land disturbance. Accordingly, no additional studies are required for further environmental assessment.	N/A
3. Is the activity located within, or will it affect, areas: within 200m of waters* within a sand dune system* on a ridge top, ridge line or headland within 200m below or above a cliff face within 20m of or in a cave, rock shelter or a cave mouth?	<input type="checkbox"/>	N/A	N/A	N/A
4. If Aboriginal objects or landscape features are present, can impacts be avoided?	<input type="checkbox"/>	N/A	N/A	N/A

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
5. If the above steps indicate that there remains a risk of harm or disturbance, has a desktop assessment and visual inspection been undertaken?	<input type="checkbox"/>	N/A	N/A	N/A
6. Is the activity likely to affect wild resources or access to these resources, which are used or valued by the Aboriginal community?	<input type="checkbox"/>	N/A	N/A	N/A

6.2.6 Other Cultural Heritage Impacts During Construction or Operation

	Applicable?*	Impact level (negligible, low, medium or high; negative or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. What is the impact on places, buildings, landscapes or moveable heritage items? Attach relevant supporting information where required, such as a HIS	<input type="checkbox"/>	N/A	N/A	N/A
2. Is any vegetation of cultural landscape value likely to be affected (e.g. gardens and settings, introduced exotic species, or evidence of broader remnant land uses)?	<input type="checkbox"/>	N/A	N/A	N/A

6.3 Summary of Mitigation Measures

Table 7: Summary of Mitigation Measures

Aspect	Mitigation measure	Timing
Construction management	To ensure dust is concealed within the work area, hoardings will be installed to the larger fit out areas with the smaller areas to use plastic zip walls. Dust extraction fans will be used as required.	Prior to Commencement of Works
Construction management	Prior to the commencement of works, a notice will be provided and required to be signed off by the head of staff to confirm acceptable start time and acceptance to shutdown mechanical and fire systems during works.	Prior to Commencement of Works
Construction management	The fire alarm is to be deactivated at commencement and recommissioned during building commissioning.	Prior to Commencement of Works
Construction management	Fire egress paths will be maintained and modified where required in accordance with fire engineer and private certifying authority requirements. No works will be undertaken until this is established and signed off.	Prior to Commencement of Works
Construction management	Following works the foreman will ensure all areas are clean, including the adjacent car park, systems are up and running and the area is signed back over to the staff including the notification to NSWFB and any other authorities.	Prior to Commencement of Works

6.4 Summary Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed development, it is determined that:

- The extent and nature of potential impacts are low and will not have significant adverse effects on the locality, community and the environment;
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community; and
- Given the above, it is determined that an EIS is not required for the proposed development activity.

7. Environmental Factors Considered

7.1 Clause 171 Environmental Factors Checklist

As part of its obligations under section 5.5 of the EP&A Act, HI is required to take into account, to the fullest extent possible, all matters likely to affect the environment. The determining authority is required by clause 171 of the EP&A Regulation to give consideration to a number of factors, as listed in the table below.

Table 8: Clause 171 EP&A Regulation Checklist (NSW Legislation)

Has the REF considered the following points?	Relevant Details
Any environmental impact on a community	Temporary / Minor
Any transformation of locality	Minor
Any environmental impact on the ecosystems of the locality	Nil
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	Nil
Any effect on a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance, or other special value for present or future generations	Nil
Any impact on the habitat of protected animals (within the meaning of <i>BC Act 2016</i>)	Nil
Any endangering of any species of animal, plant or other form of life, whether living on land, in water, or in the air	Nil
Any long-term effects on the environment	Nil
Any degradation of the quality of the environment	Nil
Any risk to the safety of the environment	Temporary / Minor
Any reduction in the range of beneficial uses of the environment	Nil
Any pollution of the environment	Nil
Any environmental problems associated with the disposal of waste	Nil
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply	Nil
Any cumulative environmental effect with other existing or likely future activities	Nil
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions.	Nil

7.2 Matters of National Environmental Significance Checklist

Matters of National Environment Significance are matters protected under national environmental law (Environment Protection and Biodiversity Conservation Act 1999). The following checklist provides guidance on whether an action is likely to have an impact on one of these matters, and whether further assessment of significance is required. This checklist or similar should be included in the REF to demonstrate that all matters have been considered.

Table 9: EPBC Act 1999 (Commonwealth Legislation)

Significance Matter	Yes/ No	Relevant Details
Listed threatened species and communities	No	N/A
Listed migratory species	No	N/A
RAMSAR wetlands of international importance	No	N/A
Commonwealth marine environment	No	N/A
World heritage properties	No	N/A
National heritage places	No	N/A
The Great Barrier Reef Marine Park	No	N/A
Nuclear actions	No	N/A
A water resource, in relation to coal seam gas development and large coal mining development	No	N/A

8. Justification and Conclusion

The proposed fit out works to the community health building at Griffith Base Hospital is subject to assessment under Part 5 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As discussed in detail in this report, the proposed works will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

As outlined in this REF, the proposed activity can be justified on the following grounds:

- It responds to an existing need within the community;
- It complies with, or is consistent with all relevant legislation, plans and policies;
- It has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5.1 of the EP&A Act. On this basis, it is recommended that HI approve the proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of matters outlined in this report.

Contact Details

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