

HEALTH INFRASTRUCTURE

Review of Environmental Factors

Cooma Hospital and Health Service— Key Worker Accommodation

Version Number 4

24 April 2024



REF Template Version: February 2023.

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 construction of key workers accommodation at Cooma Hospital and Health Service, 2A Bent Street, Cooma.

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* (TI SEPP).

This REF provides a true and fair review of the activity in relation to its likely impact on the environment and the information it contains is neither false nor misleading. It addresses to the fullest extent possible all the factors listed in Section 3 of the *Guidelines for Division 5.1 Assessments* (DPE June 2022), the *Environmental Planning and Assessment Regulation 2021* and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Based upon the information presented in this REF, it is concluded that, subject to 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.

Declaration	
Author:	Larissa Brennan
Qualification:	Bachelor of Environmental Planning
Registered planner Number:	143427
Position:	Director
Company:	LJB Urban Planning Pty Ltd and (ABN 73 123 529 564)
Date:	24 April 2024

Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
Draft	4 April 2023	Larissa Brennan	Review of Environmental Factors	Louise Meilak	Larissa Brennan
Draft V2	10 July 2023	Larissa Brennan	Review of Environmental Factors	Louise Meilak	Larissa Brennan
Draft Final	7 August 2023	Larissa Brennan	Review of Environmental Factors	Larissa Brennan	Larissa Brennan
Final	24 April 2024	Larissa Brennan	Review of Environmental Factors	Larissa Brennan	Larissa Brennan

Contents

Declaration.....	2
Document Management, Tracking and Revision History	2
Contents.....	3
Tables	4
Figures	4
Appendices	5
Abbreviations	7
Executive Summary	9
1. Introduction	14
1.1 Proposal need and Alternatives	14
2. Site Analysis and Description	15
2.1 The Site and Locality	15
2.1.1 Existing Development	19
2.1.2 Other Site Elements.....	19
2.1.3 Site Considerations and Constraints	20
2.2 Surrounding Development.....	21
3. Proposed Activity	22
3.1 Proposal Overview	22
3.1.1 Design Approach	22
3.1.2 Proposed Activity	25
3.2 Proposal Need, Options and Alternatives	28
3.2.1 Strategic Justification	28
3.2.2 Alternatives and Options.....	28
3.3 Construction Activities	28
3.4 Operational Activities.....	30
4. Statutory Framework.....	32
4.1 Planning Approval Pathway	32
4.2 Environmental Protection and Biodiversity Conservation Act 1999	32
4.3 Environmental Planning and Assessment Act 1979	33
4.4 Environmental Planning and Assessment Regulation 2021	33
4.5 Other NSW Legislation	34
5. Consultation	37
5.1 Statutory Consultation	37
5.2 Community and Stakeholder Engagement	39
6. Environmental Impact Assessment.....	40
6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations	40
6.2 Identification of Issues	43
6.2.1 Traffic, Access and Parking	43

6.2.2	Noise and Vibration	44
6.2.3	Air Quality and Energy	45
6.2.4	Soils and Geology	46
6.2.4	Coastal risks	46
6.2.5	Hydrology, Flooding and Water Quality	47
6.2.6	Visual Amenity	47
6.2.7	Aboriginal Heritage	53
6.2.8	Non-Aboriginal Heritage	53
6.2.9	Ecology	54
6.2.10	Bushfire	56
6.2.11	Land Uses and Services	56
6.2.12	Waste Generation	56
6.2.13	Hazardous Materials and Contamination	56
6.2.14	Sustainability and Climate Resilience	58
6.2.15	Community Impact/Social Impact.....	58
6.2.16	Cumulative Impact	59
7.	Summary of Mitigation Measures	60
7.1	Summary of Impacts.....	60
8.	Justification and Conclusion	61

Tables

Table 1: Section 10.7 Planning Certificate.....	20
Table 2: Alternatives considered for the proposal	28
Table 3: Project Timeframes and Construction Activities	28
Table 4: Description of proposed activities	32
Table 5: EPBC Checklist.....	32
Table 6: Matters for consideration under Subsection 3, Section 5.5 of the EP&A Act.....	33
Table 7: Other Possible Legislative Requirements.....	34
Table 8: Stakeholders required to be notified	37
Table 9: Issues raised and responses	37
Table 10: Summary of Environmental Factors Reviewed in Relation to the Activity	40

Figures

Figure 1: Locality Map.....	15
Figure 2: Subject site	16
Figure 3: : Looking south from the corner of Bombala Street and Victoria Street, towards the original heritage listed hospital building	16
Figure 4: Looking west along Victoria Street.	16
Figure 5: Looking south along Bent Street, hospital emergency entry to the left of photograph.....	16

Figure 6: Looking north-east along Vale Street, hospital to left of photograph	17
Figure 7: Looking south-west along Vale Street, hospital to right of photograph.	17
Figure 8: Looking north-west along Bombala Street, hospital positioned to the left of the photograph	17
Figure 9: Looking south along Bombala Street, hospital positioned to left of photograph	18
Figure 10: Looking north from Helipad, towards the main hospital emergency department	18
Figure 11: Perspective of Bombala Street elevation	25
Figure 12: Perspective of Bombala Street elevation.	26
Figure 13: Looking north towards the Subject site from the Snowy Monaro Highway	47
Figure 14: : Looking north along Bombala Street near intersection with Albert Street.....	47
Figure 15: Perspective of Bombala Street elevation	48
Figure 16: Looking West from Bombala Street, directly towards the site of the new building	48
Figure 17: : Looking west towards the original hospital building, from Bombala Street, which is positioned to the north of the new building	50
Figure 18: : Plan showing the main construction phases associated with the heritage-listed hospital building west towards the original hospital building.	50
Figure 19: Architectural eastern elevation of the proposed building	51
Figure 20: Looking south along Bombala Street from Victoria Street intersection, original heritage-listed hospital building	51
Figure 21: Looking south along Bombala Street	51
Figure 22: Looking south from Victoria Street towards the heritage-listed original hospital building	52
Figure 23: Aerial view of the subject site	52
Figure 24: Contextual Study	54

Appendices

Appendix	Description	Author	Rev/Ref/Date
A	Architectural Drawings	Kearney Architecture	4/04/24
B	Design Report	Kearney Architecture	4/04/24
C	Survey	Land Data Surveys	undated
D	Electrical Plan	Trinamic Consultants	23/02/24
E	Section 10.7 Planning Certificate	Snowy Monaro Regional Council	22/08/22
F	Notification Letters and Responses	Various	Various
G	Heritage Impact Assessment	NBRS	April 2024
H	AHIMS Search	Heritage NSW	21/03/23
I	Landscape Plan Concept	Andrew Gold Landscape Architecture	23/04/24
J	Arborist Report	Abel Ecology	15/02/23
K	Detailed Site Investigation RAP	JK Geotechnics JK Geotechnics	30/06/23 30/06/23
L	Traffic Technical Memorandum	GHD	07/02/23
M	Acoustic Report	Acoustic Logic	10/10/22

N	Flood Report	GHD	22/05/23
O	Civil Drawing	Kehoe Myers	11/03/24
P	Erosion and Sediment Control Plan	GHD	20/01/23
Q	Mitigation Measures	LJB Urban Planning Pty Ltd	16/04/24
R	Accessibility Review	Kearney Architecture	24/04/24

Abbreviations

Abbreviation	Description
AHIMS	Aboriginal Heritage Information Management System BC Regulation
BC Act 2016	<i>Biodiversity Conservation Act 2016</i>
BC Act 2017	<i>Biodiversity Conservation Act 2017</i>
BC Regulation	Biodiversity Conservation Regulation 2017
BAM	Biodiversity Assessment Method
CA	Certifying Authority
CE	Chief Executive
CMP	Construction Management Plan
CWC	Connecting with Country
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	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act (Cwth)	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
HI	Health Infrastructure
LEP	Local Environmental Plan
LGA	Local Government Area
MNES	Matters of National Environmental Significance
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPW Regulation	National Parks and Wildlife Regulation 2009
NPWS	National Parks and Wildlife Service (part of EES)
NT Act (Cth)	<i>Commonwealth Native Title Act 1993</i>
OEH	(Former) Office of Environment and Heritage
PCMP	Preliminary Construction Management Plan
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Proponent	NSW Health Infrastructure
REF	Review of Environmental Factors
RF Act	<i>Rural Fires Act 1997</i>

Abbreviation	Description
RFS	Rural Fire Service
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
SEPP	State Environmental Planning Policy
TI SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	<i>Water Management Act 2000</i>

Executive Summary

The Proposal

LJB Urban Planning Pty Ltd has been commissioned by Health Infrastructure to prepare a Review of Environmental Factors (REF) in support of the following works within the Cooma Hospital and Health Service. The works propose the provision of Key Worker Accommodation and include:

- Construction of a two-storey key worker accommodation block containing twelve (12) self-contained one-bedroom units with a shared internal and external communal space at ground level.
- Removal of twelve (12) trees.
- Remediation of the site*.
- Landscaping works, including tree replacement and footpath.

*as the works are considered Category 1 Remediation, Development consent under Part 4 is required. DA10.2023.238.1 was approved by Council on 28.9.2023.

The REF was originally completed in August 2023; however it was determined that the plans needed further development in relation to the architectural design of the elevations and other minor changes. The plans have been amended and this REF assesses the final plans for the Cooma Key Worker Accommodation.

Need for the Proposal

The proposed works will provide modern accommodation to service the clinical staff that are required to visit the hospital, which are “fly in, fly out” and “drive in, drive out” workers. The current accommodation is outdated.

The location of the accommodation block, to the east of the main hospital building, adjacent to Bombala Street has been selected, for the following reasons:

- It has the least impact on the heritage significance of the main existing hospital building to the north of the proposed works;
- It enables the least disruption to the hospital operation during construction; and
- It will ensure that the position of the building will not place an additional limitation for the future expansion for any of the existing clinical facilities.

The works are necessary to enable the much-needed upgrade of the hospital key worker accommodation and provide more amenable accommodation for visiting specialists.

Proposal Objectives

The objectives of the works are as follows:

- *To enable the hospital to provide upgraded and amenable key worker accommodation for visiting clinical staff;*
- *To ensure the new accommodation respects the heritage significance of the existing hospital building; and*
- *To enable works to be completed in a timely manner with minimal environmental impact.*

Options Considered

There have been various options explored throughout the design phase. These options are listed below:

Option 1

This option considered locating a single storey building that was positioned to the north of the existing heritage hospital building, however, as the site falls from west to east, towards Bombala Street, the building form was limited to one storey to reduce impact to the adjoining the heritage building.

Due to the fall of the land, Option 1 was limited to only 4 units. The view lines from Victoria Street and Bombala Street will no longer allow for site lines to the original hospital building, which has been expanded with additions across the years.

This option was considered to have an adverse heritage and streetscape outcome. The building would obscure the view of the original hospital building and would impede the existing views across the site. The structure would be dominant in the streetscape due to its limited setbacks and would detract from the curtilage of the building.

Option 2

This option seeks to provide a two-storey accommodation block to the south of the heritage hospital building. The block will be setback back in line with the heritage item approximately 10.661 metres from Bombala Street. It proposes a length of 35.4m at ground level and reduces by approximately 8 at first floor. The building is 16.4m wide including balconies and walkways.

The building steps down in height at the northern end which will ensure an improved integration with the existing heritage listed hospital. The stepping down of the northern end closest to the heritage item is a positive design outcome as it reduces the height and bulk of the building.

The materials and finishes of the building will be recessive colours to minimise impacts when viewed from the public domain.

The key worker accommodation in this position is considered the best option to avoid disruption to the operations of the existing facility during construction works and to ensure that adequate land remains free of structures, nearer to clinical facilities, in case further expansion to the hospital is required in the future. Importantly, it has the least impact on the heritage hospital building positioned to the north.

These options are discussed in the Design Report prepared by Kearney Architecture dated 4 April 2024, accompanying this REF at **Appendix B**. This is further addressed in Section 3.1.1 of this report.

Site Details

The subject works are proposed within the Cooma Hospital and Health Service, which is located at 2A Bent Street, Cooma.

The property is legally described as Lot 2 DP 1161366.

The key worker accommodation is located to the east of the main hospital building and south of the heritage item.

The proposed works include the following:

- Construction of a two-storey building containing twelve (12) self-contained one-bedroom units with a shared internal and communal space;
- Removal of twelve (12) trees;
- Remediation of the site*; and
- Landscaping works, including tree replacement and pathways.

*as the works are considered Category 1 Remediation, Development consent under Part 4 is required. DA10.2023.238.1 was approved by Council on 28.9.2023.

Planning Approval Pathway

This REF was prepared and submitted to Health Infrastructure. The assessment has confirmed that the works could be undertaken without consent subject to Mitigation Measures. As noted above, the remediation works are not considered development without consent and require development consent from Council. Development consent DA 10.2023.238.1 was approved by Council on 28 September 2023.

All works are within the Cooma Hospital and Health Service and this review has been undertaken in accordance with Clause 2.61 of State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP).

Statutory Consultation

In accordance with Clause 2.62(2)(a) of T&I SEP), written notice of the proposed activity was provided to Snowy Monaro Regional Council and the adjoining occupiers of land. Snowy Monaro Regional Council and adjoining occupiers were provided with a 21-day period from 27 February 2023 to 20 March 2023 to provide a response. An updated Heritage Report that confirmed the impacts are more than minor was renotified to Snowy Monaro Regional Council 7 June 2023 to 28 June 2023. No submission was received.

A copy of the notification letters and map of properties notified is attached at **Appendix F**.

A letter dated the 16 March 2023 was received from the SES and an email submission was received on 20 March 2023 from a Staff Member of Cooma Hospital and Health Service. The submissions are attached at **Appendix F** and have been outlined separately and discussed in Section 5 of this REF. A summary is provided below:

SES	Comment
<p>The SES provided the following advice following review of the application:</p> <ul style="list-style-type: none"> consider the impact of flooding on the infrastructure up to and including the PMF. pursue, if relevant, site design and stormwater management that minimises any risk to the community. ensure workers and people using the facility during and after the upgrades are aware of the flood risk, for example by using signage. develop an appropriate business emergency plan to assist in being prepared for, responding to and recovering from flooding. The NSW SES has a template which can assist in this process: http://www.sesemergencyplan.com.au/. 	<p><i>As the site is Flood Affected, the works were referred to the SES and a Flood Impact Assessment Report was prepared. The Flood report also considered the comments of the SES. The following summary response is provided to the SES comments:</i></p> <ul style="list-style-type: none"> <i>The Flood Assessment prepared by GHD considers the impact of the PMF. The location of the KWA remains above the PMF.</i> <i>GHD has considered whether stormwater management is required in section 4 of their report. Due to the small increase in impervious area (1.9%) there is no need for additional stormwater measures. The stormwater will discharge directly to Council's street drainage where it is conveyed to Cooma Creek.</i> <i>In the event of a flood Cooma would be cut off from the south. Cooma Creek is likely to flood and would restrict access to the Monaro Hwy to the south. Access to the north and west and likely to be unimpeded. The duration of inundation as stated by GHD is likely to be less than an hour. In the event of a flood, patients and staff are recommended to shelter within the hospital until the flood levels pass.</i> <p><i>A mitigation measure will be imposed to require the preparation of an emergency plan in response to flooding. This shall also consider the provision of site signage in suitable locations.</i></p>
Submission from Cooma Hospital and Health Service Employee	Comment
<p>Location near a busy road.</p>	<p><i>In relation to the proximity to a busy road, the accommodation is proposed to be setback in excess of 10 metres from the Bombala Street frontage. An Acoustic Report has been prepared to be considered during the assessment process. The report provides recommendations to ensure the accommodation achieves internal acoustic amenity. There is an existing driveway and parking area to the south that will provide safe access from Bombala Street. Cooma Hospital is in need of Key Worker Accommodation, this location was selected for a range of reasons. These include but not limited to the retention of the open vista and sightlines to the heritage item, ability to be setback from the boundary, conveniently accessed from Bombala Street and minimizes conflict with existing hospital services.</i></p>
<p>Close proximity of building to large oxygen storage device, which backs on to the outpatient building and is likely to need</p>	<p><i>The works are unlikely to have an impact on the location of the oxygen storage device that is located approximately 16 metres away from the accommodation. Any future plans for expansion will need to consider the location and proximity to all hospital assets.</i></p>

SES	Comment
extending in coming years due to increased community demand.	
Consideration of heritage of the trees along the border of the hospital.	<i>A Heritage Report has been prepared to inform the assessment of the works. The Heritage Report also considered the proposed tree removal and deemed this acceptable. It is noted that the trees were planted in 1960 following the demolition of former buildings in this location. They did not form part of the original curtilage of the item. Replacement planting is proposed, and a landscape plan has been prepared as part of the application.</i>
Consideration of available parking.	<i>A Parking and Traffic Report has been prepared to inform the assessment of the works. The Traffic Consultant has determined that additional parking is not required and that there is sufficient parking available.</i>

It is therefore considered that the comments provided by the SES and Cooma Hospital and Health Service employee have been addressed as part of the assessment of the activity under this Review of Environmental Factors. The changes made to the final plans following the Statutory consultation do not change the impact or matters raised above. The plans were an improvement to the architectural design and finish of the accommodation and therefore were not re-notified.

Environmental Impacts

This REF has undertaken an assessment against the following planning controls and legislation:

- Environmental Planning and Assessment Act 1979 (EP&A Act)
- Environmental Planning and Assessment Regulation 2021 (EP&A Regulation)
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP)
- Cooma-Monaro Local Environmental Plan 2013 (LEP)

In addition, the REF considered the potential environmental issues that may arise from the proposed works including:

- Biodiversity
- Tree Removal
- Heritage
- BCA compliance
- Visual impact
- Air Quality
- Noise / Acoustic impacts
- Vehicular and pedestrian movements
- Waste Management
- Work Safety
- Impact on adjoining structures
- Social impacts

It has been determined in the REF assessment below, that the proposed environmental impacts will be minimal, the proposed works can be undertaken safely and will not significantly affect the heritage significance of original hospital building, positioned to the north of the new building.

The works the subject of this REF are necessary to provide improved accommodation for visiting specialists. The building is located to the south of the heritage listed building and will be setback in line with the heritage building to maintain sightlines on approach from the southern end of Bombala Street. The building steps down at the northern end to a single storey form which will ensure an improved integration with the existing heritage listed hospital. The stepping down in height closest to the heritage item is a positive design outcome as it reduces the height and bulk of

the building. The materials and finishes of the building will be recessive colours to minimise impacts when viewed from the public domain.

Due to the location and position of the building, the shadow cast will not impact surrounding properties and will primarily fall onto the adjacent driveway and carpark area.

The works will necessitate tree removal, twelve trees will require removal to facilitate the works. Replacement planting is proposed as shown on the accompanying Landscape Plans.

The works will have minimal impact on surrounding land and will not result in unreasonable adverse impacts subject to compliance with all mitigation measures that have been recommended in the report.

Justification and Conclusion

The proposed works will not result in significant or long-term impacts. The potential environmental impacts have been considered as part of this assessment and where necessary mitigation measures have been imposed to ensure its suitability.

The activity is appropriate for the following reasons:

- It responds to the needs of the hospital to provide key worker accommodation for visiting clinical staff;
- It respects the heritage significance of the existing hospital building by ensuring the heritage buildings are readily visible and able to be viewed and appreciated from the public domain;
- It complies with all relevant legislation;
- It will have minimal impact on the environment; and
- Adequate mitigation measures have been imposed to address these impacts.

In consideration of the legislation and the potential environmental issues, this REF concludes that subject to the mitigation measures identified in Section 5 to this report, the proposed works will have no adverse environmental impact and are therefore appropriate development in accordance with Clause 2.61 of the TISEPP.

1. Introduction

NSW Health Infrastructure (HI) propose to construct a two-storey building to accommodate twelve (12) key worker accommodation units, with each unit being one (1) bedroom and a shared internal and external communal area, landscaping works, including tree removal and replacement at Cooma Hospital & Health Service, located at 2A Bent Street, Cooma (the site) as part of their delivery of infrastructure solutions and services to support the healthcare needs of the NSW communities.

This Review of Environmental Factors (REF) has been prepared by LJB Urban Planning Pty Ltd on behalf of HI to determine the environmental impacts of the tree removal and proposed two storey key worker accommodation at Cooma Hospital and Health Service. For the purposes of these works, HI is the proponent and the determining authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The purpose of this 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 the *Guidelines for Division 5.1 Assessments* (DPE June 2022), the *EP&A Regulation*, and the *Commonwealth 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 and Homes under Part 5 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.

1.1 Proposal need and Alternatives.

Cooma Hospital and Health Service is heavily reliant on transient workers to provide the level of clinical staffing required. These workers are either “Fly in, Fly out” (FIFO) or “Drive in, Drive out” (DIDO). Current accommodation is not reflective of current amenity needs and therefore purpose-built modern accommodation is required on site to accommodate their needs.

The works will allow for more amenable key worker accommodation to be provided on site to enable visiting clinical staff to stay in close proximity to the hospital and in suitable safe accommodation.

There have been prior options for the location of the key worker accommodation. Originally it was proposed to locate the structure to the north of the heritage item. This option was considered to have an adverse heritage and streetscape outcome. The building would obscure the view of the original hospital building and would impede the existing views across the site. The structure would be dominant in the streetscape due to its limited setbacks and would detract from the curtilage of the building.

The proposed location of the accommodation is considered a better outcome. The building will be setback back in line with the heritage item and the building steps down at the northern end to single storey which will ensure an improved integration. The single storey component closest to the heritage item is a positive design outcome as it reduces the height and bulk of the building.

2. Site Analysis and Description

2.1 The Site and Locality

Cooma Hospital and Health Service is located in the Snowy Monaro Regional Council area, which is a local government area in south-eastern NSW, this LGA is positioned between the ACT and Victorian border with the snowy mountain region of NSW.

Figure 1 illustrates the surrounding locality:

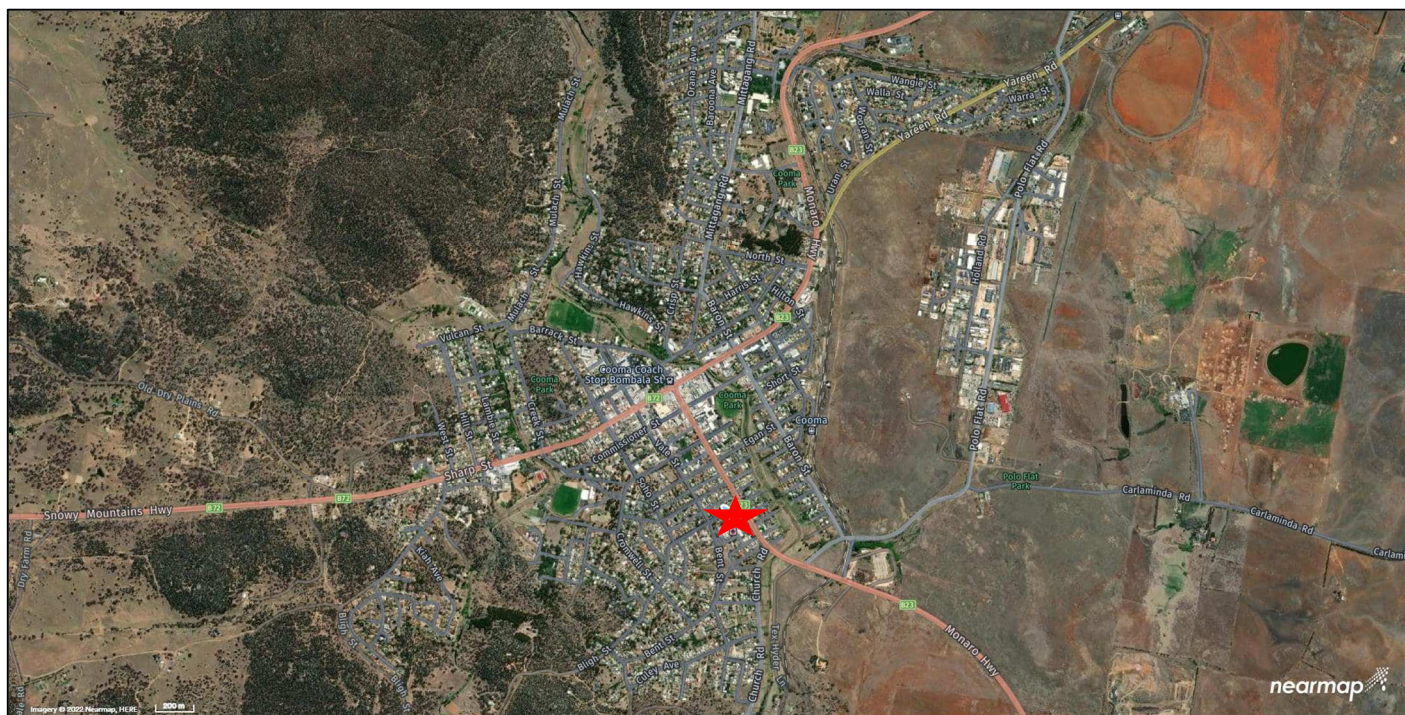


Figure 1: Locality Map – red star identifies site (Source: Nearmap)

The subject works are proposed at the Cooma Hospital and Health Service, which is located at 2A Bent Street, Cooma. The hospital site is generally bound by:

- Bombala Street to the north-east
- Victoria Street to the north-west
- Bent Street to the south-west; and
- Vale Street to the south/south-east

Detached residential dwellings are positioned on the opposite side of the above roads.

Vehicular access to the main hospital building is directly off Bent Street, secondary access points exist along Bombala Street, Vale Street and Victoria Street.

The wider hospital site consists of varying buildings with a helipad positioned in the southern corner. An internal road is positioned in the south-western part of the site.

The original hospital building, positioned to the north of the proposed key worker accommodation is an item of environmental heritage and the hospital listed on the Section 170 register for heritage significance.

The works, the subject of this REF, will result in the removal of twelve (12) trees in proximity to the works.

The portion of the site, the subject of this REF, includes:

- Lot 2 DP 1161366

Figure 2 shows the wider hospital site (red boarder) and the heritage listed building (circled in blue) and location of proposed works (yellow star denotes location):



Figure 2: Subject site (Source: Google Maps)

The following photographs identify the surrounding residential uses:



Figure 3: Looking south from the corner of Bombala Street and Victoria Street, towards the original heritage listed hospital building. (Source: Google Maps)

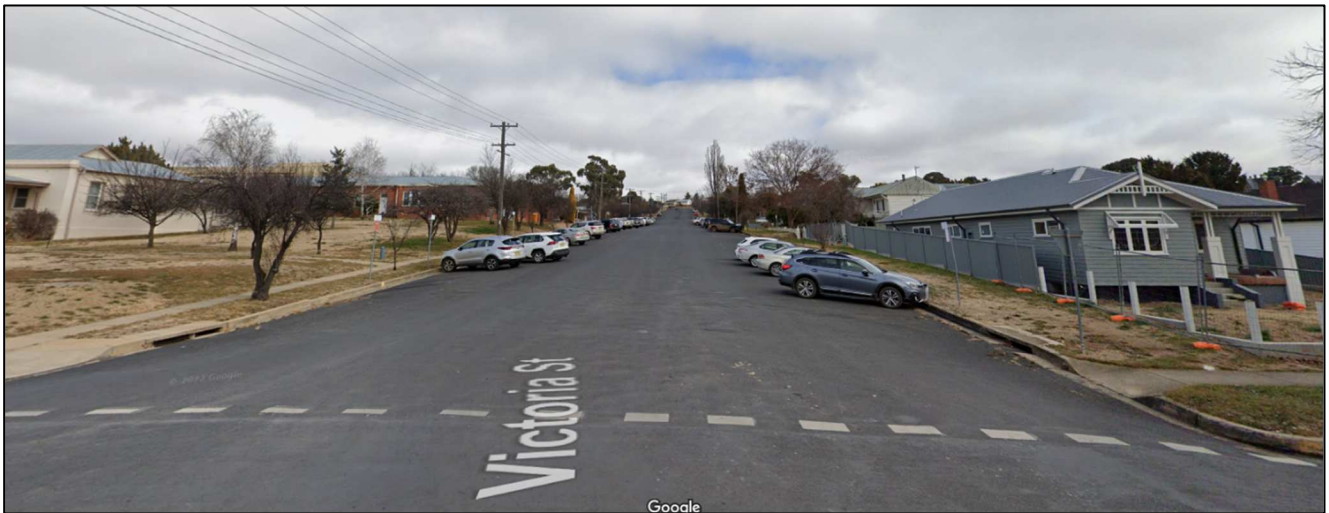


Figure 4: Looking west along Victoria Street (Source: Google Maps)



Figure 5: Looking south along Bent Street, hospital emergency entry to the left of photograph (Source: Google Maps)

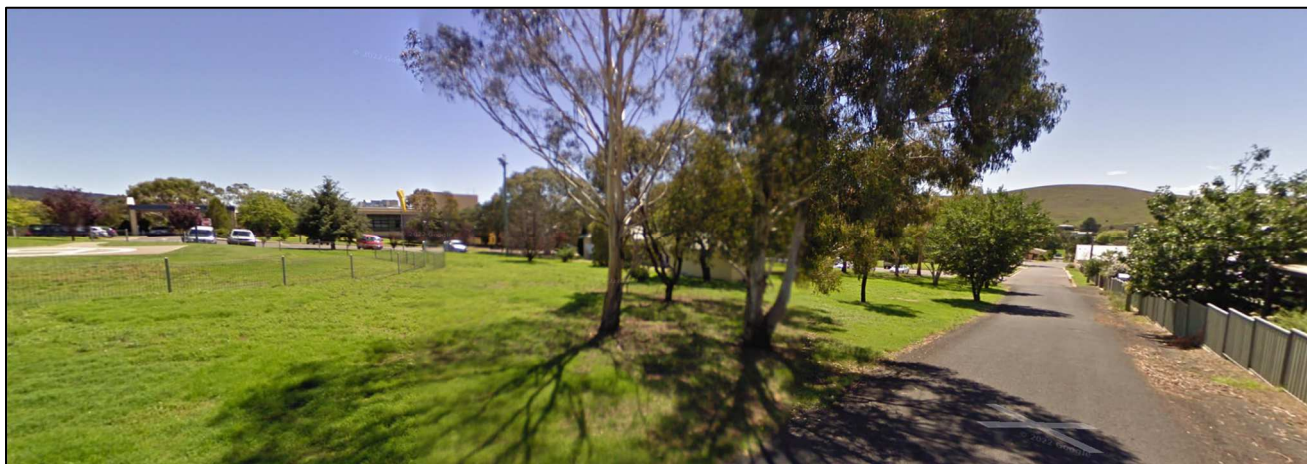


Figure 6: Looking north-east along Vale Street, hospital to left of photograph (Source: Google Maps)



Figure 7: Looking south-west along Vale Street, hospital to right of photograph (Source: Google Maps)



Figure 8: Looking north-west along Bombala Street, hospital positioned to the left of the photograph (Source: Google Maps)



Figure 9: Looking south along Bombala Street, hospital positioned to left of photograph (Source: Google Maps)

2.1.1 Existing Development

The Cooma Hospital and Health Service is a 41-bed facility with renal and oncology outpatient services onsite with a 24-hour accident and emergency department. The hospital has partnered up with several universities and has opened a Nursing and Midwifery Rural Clinical School.

The hospital campus contains a series of single storey buildings that are internally connected via pathways. The carparking areas are predominantly towards the southern section of the site.

A helipad is located in the south-western corner as shown in the aerial photograph at **Figure 2** above.

The following photograph is taken from the helipad looking towards the Emergency Department of the hospital.



Figure 10: Looking north from Helipad, towards the main hospital emergency department (Source: Google Maps)

2.1.2 Other Site Elements

Topography

The subject site falls west to east, towards Bombala Street, with a fall of 12 metres. There will be no significant cut and fill to construct the accommodation block as the floor slab will be suspended above the ground.

Traffic/Transport

The subject hospital site has access to four (4) streets, being: Bombala Street to the east, Victoria Street to the north, Bent Street to the west and Vale Street to the south.

The main car parking area is accessed from Bent Street or Vale Street, this will remain insitu. The existing Bombala Street layback and driveway will remain and will provide access to nearby parking spaces for the key worker accommodation.

The Traffic Assessment at **Appendix L** has determined that there is no additional need for car parking, as currently specialists visit the site but stay elsewhere. Therefore, there is no additional demand for car parking. There is also sufficient parking provided on site and within the surrounding street network that is not time limited or restricted.

Vegetation

A total of twelve (12) trees will be removed to enable the building to be constructed. The species to be removed include:

- Eight (8) Cupresses sp;
- One (1) Acer negundo;
- One (1) Ilex aquifolium;
- One (1) Ligustrum sinense; and
- One (1) Ulmus parvifolius.

The last three species require removal as they were not considered viable to retain due to poor health. The remainder require removal due to the construction of the worker accommodation. Four of the Cupresses sp. are able to be transplanted if a suitable site is available within the hospital grounds. A mitigation measure to this effect will be included.

The accompanying Arborist Report at **Appendix J** supports the removal and requires the inclusion of a Mitigation Measures to manage tree management, root management, crown management, certification and fauna management.

Mitigation measures will be included to ensure all existing trees, not approved for removal, are protected during works.

Heritage

To the north of the proposed building, stands the original hospital building. This building is listed on the s170 register and under the LEP. A search of NSW database identifies the building to be significant as it retains *a high degree of external integrity, is historically and aesthetically significant*. It is noted that various extensions and additions have also occurred in 1952, 1953, 1956 and 1976.

In addition, the site is in close proximity to a heritage item, located at 108 Bombala Street, being a single storey stone cottage. Given the location of the works, it is unlikely to impact this item.

A Heritage Impact Assessment prepared by NBRS is attached at **Appendix G**, the report confirms that the proposed development will have an acceptable impact although more than minor on heritage significance of the item and heritage items within the vicinity of the site.

The potential impacts on the Heritage item are discussed in greater detail below at Section 6.2.8.

The proposed development has been designed to be sensitive to the adjoining heritage item and is suitably located to ensure view lines are retained to the original hospital building by the incorporation of adequate setbacks. The scale of the two-storey building steps down to provide an appropriate transition to the item.

2.1.3 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 1411/22 dated 22/08/2022 identifies that the site is located within the SP2 Infrastructure zone under Cooma-Monaro Local Environmental Plan 2013, and is provided at **Appendix E**.

Table 1: Section 10.7 Planning Certificate

Affectation	Yes	No
Critical habitat		✓

Affectation	Yes	No
Conservation area		✓
Item of environmental heritage	✓ Heritage Impact Assessment has considered the impact. Refer to Appendix G . This is further addressed in Section 6 of this report.	
Affected by coastal hazards		✓
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 sulfate or any other risk		✓
Affected by any acquisition of land provision		✓
Biodiversity certified land or subject to any biobanking agreement or property vegetation plan		✓
Significantly contaminated		✓
Subject to flood related development controls	✓ A Flood Impact Assessment Report has been prepared to consider the impact. Refer to Appendix N . This is further addressed in Section 6 of this report.	

2.2 Surrounding Development

The existing development across the site is comprised of hospital buildings, facilities, staff accommodation, access roads and parking facilities.

Surrounding development consists of predominantly detached residential dwellings with some medium density residential dwellings as well. Roads surround the hospital site on all sides.

3. Proposed Activity

3.1 Proposal Overview

The proposed works, subject to this REF, relate to the following:

- Construction of a two-storey key worker accommodation block containing twelve (12) self-contained one-bedroom units with a shared internal and external communal space at ground level.
- Removal of twelve (12) trees.
- Remediation of the site*.
- Landscaping works, including tree replacement and footpath.

*as the works are considered Category 1 Remediation, Development consent under Part 4 is required. DA10.2023.238.1 was approved by Council on 28.9.2023.

The accommodation is proposed in a two-storey structure. There is a total of twelve (12) self-contained one-bedroom units. Each unit contains the following:

- Kitchen along one wall, with living and dining room opposite
- Bathroom and separate laundry
- One bedroom with storage
- Sliding door opening onto a balcony area of private open space
- Ground level units have access to private courtyard

The units are single storey over two levels. The upper units are accessed via an external stair. Two of the ground floor units are accessible. All units are cross ventilated with openings to the east and west.

In addition to the private open space, there is an internal and external area of communal open space for use by the workers.

The units do not have a separate waste management area, garbage storage will be provided within the units and the occupants will transfer their waste to the waste bins adjacent to the ambulance bay.

3.1.1 Design Approach

Placemaking and Design

The application is accompanied by a design report and this report is found at **Appendix B**. The proposed development has had consideration for the existing built environment and heritage listed site constraints. In particular, the proposal satisfies the seven objectives of *Better Placed (GANSW, May 2017)* resulting in an acceptable development on the hospital site and within the wider Cooma town.

The seven objectives are discussed separately below:

Objective 1: Better Fit

The proposed building has considered the topography, adjacent heritage listed hospital building and functionality of the spaces within the new building.

The new building will be positioned to the south of the existing heritage listed hospital building and will be setback 10.661m from Bombala Street boundary and will generally be in line with the heritage listed building. This allows for sightlines to the heritage listed building from the public domain.

The building is two storeys in height but steps down at the northern end to create an improved transition with the adjoining heritage listed building. The outdoor deck will be a communal area for future residents. The slab will be on piers to avoid significant cut and fill, due to the topography of the site.

Recessive colours combined with materials and finishes, which incorporates metal cladding in two grey shades and painted and 'timber look' screens will result in a building form that will not adversely impact on the existing hospital buildings, in particular the heritage listed early building to the north.

All elevations are clad in metal cladding with a combination of surf mist and shale grey. The finishes combined with external decking, balustrade vertical battens provide adequate articulation and modulation.

The eastern elevation, fronting Bombala Street, will be simplistic in design and contain both horizontal and vertical elements that will provide articulation to the future design. Large window openings, along with balconies, on both the ground and first floor will provide for passive natural surveillance. The western elevation contains similar features and treatments.

The northern elevation will be stepped down in height to reduce scale adjacent to the heritage listed building. A combination of medium and light wall cladding with aluminium and timber look battens will ensure that scale is acceptable and reduced scale for the heritage listed building to the north, the outdoor entertaining deck will also provide passive natural surveillance to the grounds of the public domain and hospital grounds.

The western elevation (rear) will provide a southern and northern external staircase that will provide access to the first-floor rooms. Again large windows will be positioned along both ground and first floor levels, providing for increased passive surveillance of the hospital grounds and car park.

The position of the proposed building footprint was more suitable as it was immediately adjacent to existing on-site car parking, and this is positive as additional works on the site are minimised.

Overall, the key worker accommodation building has been designed to respect existing heritage building to the north and will ensure that the scale is in keeping with the locality.

Objective 2: Better Performance

The building will be constructed in a modular form ensuring a tight sealed envelope with an adequate level of insulation to maintain temperature within the worker accommodation.

The off-site fabrication results in reduced building waste and all fixtures and fittings will be selected to achieve high efficiency for both water and energy use, to satisfy the NCC requirements.

In addition, the orientation of windows will allow for breezes in summer to cool the units without the need to rely on mechanical ventilation.

Off-site manufacturing results in less waste and ability to recycle products with improved building sealing and the ability to utilise renewable timbers.

Objective 3: Better Community

The provision of improved key worker accommodation within the Cooma Hospital and Health Service site will ensure that the community receives specialist health care close to home when required. The accommodation is needed to ensure that health specialists can continue to service the region.

Objective 4: Better for People

The design of the new building has considered CPTED design principles and satisfies all the principles, refer to the design report attached at **Appendix B**.

Objective 5: Better Working

The internal design and position of the new building has been designed to allow for private accommodation that has the ability to connect with communal external spaces that are protected from the elements by a pergola and 'timberlock' aluminium fin privacy screens. The walkway entries along the rear façade will enable for social interaction when moving through the new building.

All rooms will connect to an external shared entertaining area positioned at the southern side of the building which consists of internal and external areas. The internal area is provided with a communal kitchen, dining and living area.

Overall, the design and layout of the building has been carefully considered and is suitable for the longevity of the hospital in Cooma to suit the needs of visiting key workers.

Objective 6: Better Value

The provision of the key worker accommodation in a modular form reduces building costs. However, the design, as discussed above, will ensure that the building value is highly suitable for the hospital site and will benefit the Cooma community by allowing specialists to service the region.

Objective 7: Better Look and Feel

The overall design is appropriate for the Cooma Hospital and Health Service site and is in keeping with the heritage values across the site, in particular, a simple flat profile roof form that steps down at the northern end (adjacent to the heritage building), simple recessive colour palette and various materials/finishes will ensure the building is complimentary to the heritage values and surrounding residential development.

All the above will result in a suitable design that will entice specialist to return to this region time-and-time again and this will benefit the local community, who will be able to utilise their services when required.

Overall, the proposed development is an acceptable design in a suitable location that has been well considered in the design process.

Connecting with Country/Engagement

The traditional owners of the land are the Ngarigo Peoples.

Health Infrastructure discussed the proposed works with a local elder Robert Buffington from Southern NSW LHD. It was considered that broader consultation with community members was not needed at this stage, and it was recommended that the units contain Local Aboriginal Art and native planting be considered for sustainability. These recommendations will form part of the Mitigation Measures at **Appendix Q**.

Further a search of the Aboriginal Heritage Information Management System (AHIMS) was performed and determined that there are no identified Aboriginal items of concern with the area, the subject of this REF, refer to **Appendix H**.

The Connecting with Country Draft Framework (2020) Strategic Goals are listed and addressed separately below:

1. *Aboriginal peoples have access to their homelands so they can continue their responsibility to care for Country and protect sensitive sites.*

Agreed. The construction of the key worker accommodation will not be undertaken on land that has been identified as containing Aboriginal Items and/or having connections to any Aboriginal communities.

2. *Aboriginal cultural knowledge is valued and respected. Aboriginal knowledge-holders will co-lead design and development of all NSW infrastructure projects.*

Noted. Consultation was not required to be undertaken. Informal consultation occurred with a Local Elder who has recommended Local Aboriginal Art and native landscaping be used.

3. *Impacts of natural events such as fire, drought, and flooding, exacerbated by unsustainable land and water-use practices, are reduced.*

The proposed key worker accommodation has not been identified as being affected by any of the above natural events.

Section 3 of the accompanying Design Report, refer to **Appendix B**, has considered that there are no likely impacts on any Aboriginal objects or items.

Based on the above discussion and the proposed design report, at **Appendix B**, the proposal is suitable, and the design will not detrimentally impact on any Aboriginal items and/or places.

Sustainability and Climate Resilience

As discussed above, the off-site fabrication of the building, results in reduced building waste and all fixtures and fittings will be selected to achieve high efficiency for both water and energy use, to satisfy the NCC requirements.

The sustainability provisions will assist in achieving the requirements of DGN 58 and satisfying the HI Sustainability Framework. The project is required to achieve a 4-star green rating. A mitigation measure will be included to ensure this is satisfied.

3.1.2 Proposed Activity

Demolition and Site Works

Prior to the commencement of works, a gas tank enclosure, existing slab and rock breaching will require demolition and removal.

Waste from these works will require safe disposal, a mitigation measure will be included to ensure that this occurs safely

Built Form

The modular two storey building will consist of twelve (12) x 1-bedroom self-contained units that will provide private accommodation for fly-in/fly-out (FIFO) and/or drive-in/drive-out (DIDO) workers, as the hospital relies heavily on transient workers.

The building will be manufactured off-site and craned on to an established pier and suspended slab. The accompanying traffic report at **Appendix L**, has considered the location and impacts of the crane that is required to place the building in place and determined that the traffic will not be adversely affected by this operation.

The accommodation building will be positioned 10.661m from the Bombala Street frontage and 4.47m from the rear existing car park. A separation of approximately 4.5m will be provided between the heritage building and the single storey component of the building this is increased to 15.405m separation from the two-storey structure of the proposed building and heritage building.

The new building reduces in height to one storey at the northern end and this ensures that there is an improved transition with heritage building, in particular, the last 4.08m of the building will be single storey with the open outdoor entertaining room, which will be roofed with a light-weight pergola, also being single storey. Together these elements provide a reasonable setback to the heritage building.

As the site slopes from the west to the east, the height of the piers at the south-eastern corner will be approximately 1.2m above ground lowering in height as the building extends to the north. The change in level will not be readily evident as it will be screen by the timber look aluminium batten fencing. The overall height is 8.7m at the south-western corner of the site with the height reducing to the west and north due to existing topography of the site.

The piers and slab reduce the need for cut and fill and this is a positive outcome, however this does result in increased height at the south-eastern end. This section of the building will be partly screened by the trees retained at the corner of Bombala Street and the driveway entrance. Further, the building steps down at the northern end and reduces to a height of approximately 4.95m at the north-western corner, this results in an acceptable transition to the heritage item, positioned to the north.

The accommodation block will be manufactured off site but once installed, on the piers and slab, will have a height of 8.7m. The width of the building will be 16.4m with a length of 35.4m.

The finished levels, within the building will be as follows:

- Ground level = RL799.46
- First floor = RL803.060
- Roof = RL806.96

The design of each elevation is discussed below:

Eastern Elevation (Front - Bombala Street)

The exterior of the building will be finished in metal cladding in a combination of “Surf Mist” and “Shale Grey” finishes and the metal balustrade for both ground and first floor will be painted in a dark finish. Each unit will have a large window which is split into three (3) panes of vertical glass panels, which will slide. The first floor units also have a series of highlight windows. The combination of the windows, wall and balustrade materials will provide acceptable articulation. The colour finish of the wall is recessive in nature, and this will lessen the scale of the built form.

At the northern end of the eastern elevation, the building steps down to single storey form, with the internal communal area having a skillion roof and a polycarbonate roof over the outdoor entertaining deck.

The transition of the façade from “surf mist” down to a darker “shale grey”, will lessen the impact on the heritage building and result in an acceptable transition between two-storey and single storey built form.

Western Elevation (Rear – adjacent to internal car park)

The rear elevation of the building mirrors the eastern elevation with the exception of the break on the ground level where the two accessible units do not contain an additional terrace on the western elevation.

Overall, this elevation is suitable and will provide an appropriate transition to the adjacent heritage item.

Northern Elevation (Side – adjacent to heritage building)

This elevation faces the existing hospital building, which is positioned to the north. The closer element will be the ground level covered outdoor entertaining area and footpath. These elements are in a light grey finish and with the open structure will minimise bulk and scale when viewed from the adjoining heritage building.

The two-storey portion of the development will be visible from the north, however, an increased setback of 15m is provided and this is a positive outcome as the increased setback results in less bulk and scale in close proximity to the heritage building.

There are no openings along this elevation.

Southern Elevation (Side – faces hospital driveway entry)

The elevation will consist of colorbond corrugated wall cladding in “Shale Grey” and timber look aluminium battens. In addition, on the eastern side of the elevation will be timber look battens and the western side at ground level contains a services blade to meet fire separation requirements and provide suitable articulation and interest to a façade that is visible from Bombala Street.

The rear stairs will also be visible, but they are light weight and open in form.

The finishes of the Key Worker Accommodation are shown in the following perspectives from Bombala Street:



Figure 11: Perspective of Bombala Street elevation (source: Kearney Architecture)



Figure 12: Perspective of Bombala Street elevation (source: Kearney Architecture)

Overall, the design of the building combined with the above setbacks, materials and finishes, landscaping and fencing requirements will result in a suitable building design that will not unreasonably impact on the surrounding environment. Refer to Architectural Drawings at **Appendix A** and Design Report at **Appendix B**.

Fencing

The proposed fencing will be at ground level and will be installed 5.1m from the Bombala Street boundary to create private courtyards. The fencing is 1.5m high aluminium battens with timber or aluminium posts.

Overall, the fencing is suitable and will provide delineation of the private and public spaces.

Road Works and Parking

No additional car parking is proposed. The existing car park to the west provides six (6) car spaces. There are more spaces to the south-west adjacent to the Services Block along with on-street car parking.

The provision of the key worker accommodation will not see an increase in the number of staff on the site and prior to this development all staff would be parking on-site at some stage to visit patients. Therefore, the existing hospital parking and on-street parking is acceptable.

No road works, internal or external are proposed, other than minor regrading of internal parking. The adjacent footpath is being upgraded to ensure it provides accessible access surrounding the building.

Tree Removal and Landscaping

The proposed development will involve the removal of twelve (12) trees, refer Arborist Report at **Appendix J**. Trees will be replaced and a minimum rate of 1:1 and planted in a suitable location on the site, a mitigation measure will be included to require replanting at a minimum rate of 1:1 and to be in accordance with the Landscape Plan, refer to **Appendix I**.

All retained trees on site will be protected during construction works. Mitigation measures have been included to ensure protection, refer to **Appendix Q**.

The accompanying Landscape Plan, at **Appendix I**, identifies the trees that require removal and also show replanting at a minimum rate of 1:1. It is proposed that *Chinese Elm* in 45 litre size will be planted along the eastern boundary to screen the development and improve the landscaped edge of the hospital site. Three *Kurrajong*'s will be planted along the southern side of the building, adjacent to the driveway entry, this will assist in softening the built form from the public domain. A combination of the shrubs, plants and trees will be planted on the site as shown on the landscape plan.

The proposed Landscape Plan is suitable and will result in improved plantings that will assist in softening the new building, particularly when viewed from the street. A mitigation has been included requiring the use of Local Native Species.

Utilities

Refer to Electrical Plan at **Appendix D**, the site is connected to all utilities. The redundant gas tank enclosure will be demolished and removed as part of the works.

3.2 Proposal Need, Options and Alternatives

3.2.1 Strategic Justification

Cooma Hospital and Health Service relies heavily on transient workers to meet the needs of the hospital in terms of clinical staffing requirements. The workers are either fly in/ fly out or alternatively drive in and drive out. The existing workers do not have on-site accommodation and this application will provide for a contemporary building that will be able to accommodate future key workers.

The proposed accommodation will ensure that contemporary facilities will meet the needs of these key workers to ensure that they keep returning and maintain critical health services to the community and region.

3.2.2 Alternatives and Options

An overview of the alternatives, and an identification of the preferred alternative, for the Proposal are provided within Table 2.

Table 2: Alternatives considered for the proposal

Alternative description	Advantages and disadvantages	Preferred alternative
<p>Option 1 – locate a new single storey building on the north-west corner of the site.</p> <p>The site rapidly slopes to the east. The units in this option stepped down the site in pairs, to minimise impacts on the heritage building.</p> <p>Due to topography, development is restricted to a maximum of 4 units.</p>	<p><u>Advantages</u></p> <ul style="list-style-type: none">Single storey <p><u>Disadvantages</u></p> <ul style="list-style-type: none">Impacts on the sight lines to original heritage building when approaching from the north, along Bombala Street.Limits the number of units to be built to only 4, falling significantly below the needs of the hospital.Change in level restricts building design.	x
<p>Option 2 (current design) – two storey 12 room accommodation block located to the south of the heritage building.</p> <p>Utilises existing driveway entry and parking.</p>	<p><u>Advantages</u></p> <ul style="list-style-type: none">Retains sightlines of existing heritage building.Recessive colours, separation/setbacks combined with stepping down from two storey to single storey at the northern end reduce impacts on existing heritage building.Can provide twelve (12) units in one building. <p><u>Disadvantages</u></p> <ul style="list-style-type: none">Two storey height and does not provide disabled access to the second level.Proximity to the heritage building.Requires tree removal	✓

3.3 Construction Activities

The works are medium term (5 Months).

Table 3: Project Timeframes and Construction Activities

Construction activity	Description
Commencement Date	Commencement date = 29 May 2024 Completion date = estimated 25 October 2024
Work Duration/Methodology	The works are proposed to be completed in a single stage. The construction methodology is subject to confirmation by a Managing Contractor, however, will involve the following: <ol style="list-style-type: none"> 1. Infrastructure Works: This phase includes services relocation (if required) and new services installation. 2. Main Works: Erection of the accommodation building. 3. Landscape Works: Pathway construction, fencing and landscaping.
Work Hours and Duration/Construction	Standard hours are: Monday to Friday–7am to 6pm Saturday–8am to 1pm Sundays and public holidays–no work High noise generating works are to equate to a maximum of four-hour clocks, separated by at least one hour respite period. Some work may need to be completed outside of the above hours. If required, these will be planned in consultation with stakeholders and Regional Council to ensure all aspects of work are clearly understood by all parties and minimise disruption to hospital operations. This may include works which are most appropriately carried out outside of main working hours, for critical hospital operational reasons.
Workforce/Employment	Approximately 25 persons on site at any one time.
Ancillary Facilities	The site amenities and compounds erected will accommodate lunch, ablution and change facilities for the duration of the project. The proposed location will be determined post-engagement of the preferred contractor. The site amenities will be modest in area and located away from any sensitive hospital or residential uses. An area will be set aside for contractors and subcontractors to park during works.
Plant Equipment	A list of all plant equipment shall be incorporated into the Work Method Statement, a Mitigation Measure will require the preparation of a WMS, refer to Appendix Q . The following plant equipment will be used: <ul style="list-style-type: none"> • Bulldozers, backhoes and earthmoving equipment; • Articulated and fixed trucks; • Mobile cranes; • Forklifts; and • General Power Tools.
Earthworks	No bulk earthworks are proposed. Minor earthworks will be undertaken following installation of the footings and suspended slab and to undertake the footpath/landscaping works around the building. Any soil that is removed will need to be classified and disposed of accordingly as required by the RAP at Appendix F . Mitigation measures will manage such works on-site.
Source and Quantity of Materials	<u>External Materials</u> Building elements will be selected to meet NCC 2022 requirements. <u>Internal Materials</u> Internal walls will be mostly plasterboard lined steel stud walls, with appropriate fire, thermal and acoustic ratings. Detailed proposals will be developed during Schematic Design. Internal materials are to be low-maintenance and durable finishes, as well as locally appropriate. An emphasis on materials which minimise opportunity for vandalism will also be considered. To be incorporated into a mitigation measure, refer to Appendix Q .

Construction activity	Description
Traffic Management and Access	<ul style="list-style-type: none"> Minimal traffic impacts from the Infrastructure and Construction works are expected. The additional vehicles are not expected to cause delays on local roads or create subsequent impacts to other roads therefore no changes to public transport routes and services. An average of 25 persons is expected to be onsite at any one-time during construction. There is parallel parking on both sides of Bombala Street and Bent Street with no time limit either side. GHD's Technical Memorandum addresses Transport Management During Construction stating the following: <ul style="list-style-type: none"> The contractor will liaise with and gain appropriate approvals from Snowy Monaro Regional Council before implementing the following: <ul style="list-style-type: none"> Road, lane, or footpath closures Detours because of closures Construction vehicle activity in a public area Crane operation Temporary removal of on-street parking for the public Upon the creation of a Construction Management Plan, the Traffic Management plan will consider, but not limited to the below: <ul style="list-style-type: none"> Provide safe and uninterrupted access for pedestrians and vehicles accessing the construction site, hospital site and resident driveways. Maximum safety of site personnel, pedestrians, cyclists, commuters, and drivers. Minimise environmental impact as a result of construction traffic. Ensure construction traffic does not unduly interrupt existing traffic flows on the local road network. Safe operation of public transport during construction in adjacent roads. Have no vehicles arrive at the site, without prior arrangement, outside the approved working hours. Encourage site workers to utilise local public transport system, active transport, and car sharing wherever possible. Timely and effective implementation of traffic management measures. Maintain access at all times for hospital and stakeholder's deliveries; and Fulfilling the Council and the Roads and Maritime Services requirements.

3.4 Operational Activities

Use

The proposed development will be a new two storey building within the hospital site.

The use of the new two storey accommodation building will be to provide residential accommodation to transient workers who will either fly in/fly out or drive in/drive out. The building is required to provide modern facilities, which will encourage specialists to continue visiting and in turn provide additional care to those living in this region.

Operation Hours

The hours of operation will be in keeping with the existing hospital hours.

Staff/Patients

There will be no increase in staff/patients as a result of the works.

Traffic and Parking

Due to the nature of the use, it is unlikely to generate a noticeable increase in traffic.

As there is no increase in staff and/or patient beds, there will be no increased impact on the local traffic network, beyond current conditions. The provision of additional parking spaces was considered in the Traffic Report where it was determined that no additional parking was required.

A mitigation measure will be imposed to require a construction and traffic management plan to be prepared, prior to commencement of works and this will need to address how traffic and construction vehicles will be managed during works. Refer to **Appendix Q**.

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.

TI SEPP aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the TI SEPP outlines the approval requirements for works within a health service facility and in particular the replacement of key worker accommodation, within the health services facility, being Cooma Hospital and Health Service. Key worker accommodation is defined as accommodation within an existing health services facility under this division. A health service facility includes a hospital which as defined includes the provision of accommodation for nurses or other health care workers. As part of the delivery of the key worker accommodation, the works include ancillary facilities needed to support the accommodation. This includes the following:

- Connection to services and stormwater
- Internal and external communal area
- Associated landscaping

These facilities are needed to support the accommodation and are therefore ancillary to the primary purpose which is the provision of key worker accommodation.

The site is zoned SP2 Infrastructure under the *Cooma-Monaro Local Environmental Plan 2013 (LEP)*. The SP2 Infrastructure is a prescribed zone under the TI SEPP.

Therefore, the proposal is considered 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 Section 5.1 of the EP&A Act because the proposed works involve the carrying out of work, being consistent with Clause 5.1 of the EP&A Act.

TI SEPP consultation is discussed within Section 6 of this REF.

Table 4: Description of proposed activities

Division and Section within TI SEPP	Description of Works
Division 10 Section 2.61(1)(a)	<p>The proposed works involve the erection of key worker accommodation associated with a health services facility.</p> <p>It is noted that under the definition of ‘health services facility’ this includes accommodation for nurses or health care workers, which is the type of accommodation proposed under this REF</p>

4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the EPBC Act do not affect the proposal as it is not development that takes place on or affects Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency or development on Commonwealth land, nor does the proposed development affect any matters of national significance. An assessment against the EPBC Act checklist is provided at Table 5.

Table 5: EPBC Checklist

Consideration	Yes/No
Will the activity have, or likely to have, a significant impact on a declared World Heritage Property?	No
Will the activity have, or likely to have, a significant impact on a National Heritage place?	No
Will the activity have, or likely to have, a significant impact on a declared Ramsar wetland?	No
Will the activity have, or likely to have, a significant impact on Commonwealth listed threatened species or endangered community?	No

Consideration	Yes/No
Will the activity have, or likely to have, a significant impact on listed migratory species?	No
Will the activity involve any nuclear actions?	No
Will the activity have, or likely to have, a significant impact on Commonwealth marine areas?	No
Will the activity have any significant impact on Commonwealth land?	No
Would the activity affect a water resource, with respect to a coal seam gas development or large coal mining development?	No

4.3 Environmental Planning and Assessment Act 1979

Duty to Consider Environmental Impact

Part 5 of the EP&A Act applies to activities that are permissible without consent and are generally carried out by a public authority. Activities under Part 5 of the EP&A Act are assessed and determined by a public authority, referred to as the determining authority. Health Infrastructure is a public authority and is the proponent and determining authority for the proposed works.

For the purpose of satisfying the objects of the EP&A Act relating to the protection and enhancement of the environment, a determining authority, in its consideration of an activity shall, notwithstanding any other provisions of the Act or the provisions of any other Act or of any instrument made under the EP&A Act or any other Act, examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity (refer to Subsection 1 of Section 5.5 of the EP&A Act).

Section 171 of the EP&A Regulation defines the factors which must be considered when assessing the likely impact of an activity on the environment under Part 5 of the EP&A Act. Section 6 of this REF specifically responds to the factors for consideration for the activity.

Table 6 below demonstrates the effect of the proposed development activity on the matters listed for consideration in Subsection 3 of Section 5.5 of the EP&A Act.

Table 6: Matters for consideration under Subsection 3, Section 5.5 of the EP&A Act

Matter for Consideration	Impacts of Activity
Subsection 3: Without limiting subsection 1, a determining authority shall consider the effect of any activity on any wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.	No impacts.
Note: If a biobanking statement has been issued in respect of a development under Part 7A of the <i>Threatened Species Conservation Act 1995</i> , the determining authority is not required to consider the impact of the activity on biodiversity values.	

4.4 Environmental Planning and Assessment Regulation 2021

Section 171(1) of the EP&A Regulation notes that when considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the guidelines that apply to the activity.

The *Guidelines for Division 5.1 Assessments* (DPE June 2022) provides a list of environmental factors that must be taken into account for an environmental assessment of the activity under Part 5 of the EP&A Act. These factors are considered at Section 6 of this REF.

In addition, Section 171A of the EP&A Regulation requires the consideration of the impact an activity in a defined catchment. This is considered further below under Section 4.5 of this REF.

4.5 Other NSW Legislation

The following table lists any additional legislation that is required to be considered if it is applicable to the proposed activity.

Table 7: Other Possible Legislative Requirements

Legislation	Comment	Relevant? Yes/No
State Legislation		
<i>Rural Fires Act 1997</i>	The site is not identified as being bushfire affected.	No
<i>Biodiversity Conservation Act 2016</i>	<p>Refer to Arborist Report at Appendix J, the proposal requires the removal of twelve (12) trees, the following nine (9) trees require removal due to placement of the building and conflicting construction:</p> <p>species are listed below:</p> <ul style="list-style-type: none"> seven (7) Cypress trees species; and one (1) Acer negundo maple species. <p>The following three (3) trees require removal due to their general health and are not viable to retain:</p> <ul style="list-style-type: none"> one (1) Ilex aquifolium; one (1) Ligustrum sinense; and one (1) Ulmus parvifolius. <p>All trees are exotic and not endemic to the area. Refer to the Arborist Report at Appendix J which states that the trees are not part of any EECs and replacement will be at a minimum rate of 1:1. Mitigation measures will be included to this effect.</p>	No
<i>Water Management Act 2000</i>	Works are not within 40 metres of a watercourse.	No
<i>Contaminated Land Management Act 1997</i>	<p>The site is not listed on a contaminated land register.</p> <p>Notwithstanding, refer to the RAP at Appendix K, the site can be remediated and made suitable for the proposed use. Mitigation measures will be included to require compliance with the RAP and require a Site Audit Statement to be issued prior to commencement of use, to ensure the site has been remediated.</p> <p>This is discussed in detail at Section 6.2.13, in the report below.</p>	No – See SEPP (Resilience and Hazards) 2021 section below.
<i>Heritage Act 1977</i>	<p>The subject site is listed on both the s170 register and is also a local heritage item within the Cooma-Monaro LEP 2013. Refer to Heritage Impact Assessment at Appendix G, there is some impact on the original hospital building, that is listed within the LEP. However, the proposed location for the new building has a reduced impact and will enable views to the original 1878 building (which has been modified across time) to be kept when approaching the site from the north-west, along Bombala Street.</p> <p>It is noted that the trees being removed were planted after the 1960s, as determined in the Heritage Impact Assessment at Appendix G, therefore the removal of trees will not affect the heritage significance of the site.</p> <p>This is discussed in detail in Section 6.2.8, in the report below.</p>	Yes – the proposed works are suitable and will not detrimentally affect the heritage significance of the early hospital building.
<i>Roads Act 1993</i>	A permit will be required to enable a crane to be placed on or near the site, to enable the prefabricated building to be installed. A mitigation measure will be included, refer to Appendix Q .	Yes – permit required for crane.
<i>Local Government Act 1993</i>	Any water or sewer supply head works that require contribution payment, per Section 64 of the Act?	No
Other Acts as required	No other acts as required to be addressed.	No
Section 171A of the Environmental Planning and Assessment Regulation 2021	Are there any impacts to catchments, as defined for consideration under Section 171A of the EP&A Regulation? If any relevant assessments provided in response, note where.	No
State Legislation Planning Policies		
State Environmental Planning Policy (Planning Systems) 2021	Considerations include Local Aboriginal Land council ownership, State and Regional development considerations and concurrence.	No

Legislation	Comment	Relevant? Yes/No
State Environmental Planning Policy (Biodiversity and Conservation) 2021	<p>This SEPP applies to the subject land. Given the removal of trees from the site and potential biodiversity impacts from this.</p> <p>As discussed above, the twelve (12) trees to be removed are all exotic and not endemic to Australia. Mitigation measures will be included to ensure replacement trees are planted at a minimum rate of 1:1 elsewhere on the site. Refer to Arborist Report at Appendix J and Landscape Plan at Appendix I.</p> <p>The trees are not eucalypt and therefore are not considered to be suitable for koalas. Therefore, there is no risk in displacing them.</p> <p>The accompanying Arborist Report has determined that the trees being removed are not part of any EECs.</p> <p>No other impacts likely.</p>	Yes – trees to be removed but determined to not contain an EECs.
State Environmental Planning Policy (Resilience and Hazards) 2021	<p>A Phase 2 Contamination Report has been prepared and accompanies this REF at Appendix K.</p> <p>As a result a Remedial Action Plan (RAP), refer to Appendix K, was prepared and concludes that the site can be made suitable.</p> <p>The RAP identified the occurrence of asbestos in the form of bonded/non-friable ACM on/in fill at ground surface. Remediation works will need to be undertaken in accordance with the RAP and a mitigation measure is recommended.</p> <p>The works are Category 1 works under Section 4.8(e)(ii) of the SEPP as the remediation works are carried out on land that is identified as a heritage item under an environmental planning instrument. Category 1 works require development consent to be obtained. Development consent for the remediation works has been obtained from Snowy Monaro Council.</p> <p>This is also discussed in more detail at Section 6.2.13 below.</p> <p>Notice of completion of the Remediation Works shall be undertaken in accordance with Section 4.15 of the TI SEPP along with a Site Audit Statement (within the meaning of Part 4 of the Contaminated Land Management Act 1997).</p>	Yes – RAP identified that the site can be made suitable. Mitigation measures to be included.
State Environmental Planning Policy (Transport and Infrastructure) 2021	<p>The proposed works relate to a health services facility and the works are permitted without consent under Division 10 Clause 2.61 (1)(a). Works will not exceed 15m in height and the works are more than 5m from a boundary.</p> <p>In addition, the site has a frontage to Bombala Street, which is identified as a classified road. The following Clauses apply and have been considered in this assessment:</p> <p>Clause 2.119 Development with Frontage to Classified Road – no new openings will be constructed along Bombala Street (Snowy Mountains Highway/Monaro Highway). The proposal is suitable and won't have significant impact on the operation of the classified road as there will be no increase in staff to the wider site, in fact there will be less traffic movements as the specialist staff will not need to enter and leave the site if accommodation is provided on site.</p> <p>Bombala Street is classified as a State Road. Referral to the RMS is not required, under Clause 2.120 because car movement along this road has an average daily traffic volume well below 20,000 vehicles.</p>	Yes
State Environmental Planning Policy (Precincts – Regional) 2021	This SEPP does not apply to the subject site.	No

Cooma-Monaro Local Environmental Plan 2013

Legislation	Comment	Relevant? Yes/No
Zone	<p>SP2 – Infrastructure.</p> <p>Health Services Facility are permitted within the zone. The proposed key worker accommodation is consistent with the objectives of the zone. In particular, the development will:</p> <ul style="list-style-type: none"> Improved housing for key workers will contribute to economic increases in the locality and support existing hospital use; Design and location of the building will be compatible with surrounding uses, given setbacks, reduced height at the northern end and generous front setbacks. The development will not detrimentally impact on the heritage significance of the original hospital building, positioned to the north of the proposed building. <p>Health services will be improved for the town of Cooma.</p>	Yes
Height of Buildings	<p>No height control. Notwithstanding, the height of the prefabricated building will be 8.7m stepping down to approximately 4.95m at the northern end, adjacent to the heritage listed building, this creates an appropriate transition to this single storey building.</p> <p>The proposed setbacks from the street combined with recessive colours within the two-storey component of the buildings will ensure that the building will not result in unreasonable height, bulk and scale, when viewed from the public domain and nearby residents, including the heritage listed stone cottage at 108 Bombala Street, Cooma.</p> <p>The height is below 15m and setback more than 5m from a boundary. As such, can be considered under the TI SEPP.</p>	No
Floor Space Ratio	<p>No FSR control applies. Notwithstanding, the proposed two storey building is of an acceptable scale given the nature of hospital buildings and the setbacks reduce impact to nearby residents. The proposed development will not result in unacceptable bulk.</p>	No
Heritage	<p>To the north of the proposed building, stands the original hospital building. This building is listed on the s170 register and under the LEP. A search of NSW database identifies the building to be significant as it retains <i>a high degree of external integrity, is historically and aesthetically significant</i>. It is noted that various extensions and additions have also occurred in 1952, 1953, 1956 and 1976.</p> <p>In addition, the site is in close proximity to a heritage item, located at 108 Bombala Street, being a single storey stone cottage. The proposal will not detrimentally affect this item, refer to the Heritage Impact Assessment at Appendix G.</p> <p>The Heritage Impact Assessment prepared by NBRS is attached at Appendix G, confirms that the proposed development will have an acceptable impact on heritage significance of the item and heritage items within the vicinity of the site.</p> <p>Heritage is discussed in detail below at 6.2.8.</p>	Yes
Flood Planning	<p>Yes, the site is flood affected. A report has been prepared and is attached at Appendix N.</p> <p>The report has determined that the development is above the PMF levels.</p> <p>The proposed works can be undertaken. This is discussed in more detail at Section 6.2.5 below.</p>	Yes
Coastal Planning	<p>The site is not positioned near the coast, as such this is not applicable.</p>	NA

5. Consultation

5.1 Statutory Consultation

The REF scope of works was notified for 21 calendar days to the stakeholders outlined in Table 8.

Table 8: Stakeholders required to be notified.

Stakeholder	Relevant Section
Snowy Monaro Regional Council	Section 2.11(2), Section 2.12(2)(a) and Section 2.62(2)(a)
Adjoining Property Owners	Section 2.62(2)(b)
SES	Section 2.13(1)(a)

The notification commenced on 27th February 2023 and concluded on 20th March 2023. Copies of the notification letters, as well as responses received, are provided at **Appendix F**. An updated Heritage Report that confirmed the impacts are more than minor was re-notified to Snowy Monaro Regional Council on 7 June 2023. No submission was received.

Following the statutory consultation it was determined that the plans needed further development in relation to the architectural design of the elevations and other minor changes. The plans have been amended and this REF assesses the final plans for the Cooma Key Worker Accommodation. The changes made to the final plans following the Statutory consultation do not change the impact or matters raised above. The plans were an improvement to the architectural design and finish of the accommodation and therefore were not re-notified.

Consultation is not required under Division 1 Consultation of the TI SEPP for the following reasons.

- The works will not impact on Council related infrastructure of services;
- The works are not located within a coastal vulnerability area; and
- The works are not considered 'specified development'.

Consultation was required under Division 1 Consultation of the TI SEPP for the following reason.

- The works may affect a local heritage item;
- The works will be carried out on flood liable land;

The application was referred to Council and the SES as it is flood liable land.

Following the notification period, a total of two (2) submissions have been received.

An overview of the comments received are outlined and responded to in the table below.

Table 9: Issues raised and response.

Issue raised	Date received	Response	Reference
SES			
The SES provided the following advice following review of the application:	16 March 2023	As the site is Flood Affected, the works were referred to the SES and a Flood Impact Assessment Report was prepared. The Flood report also considered the comments of the SES. The following summary response is provided to the SES comments:	Section 6.2.5
<ul style="list-style-type: none"> • consider the impact of flooding on the infrastructure up to and including the PMF. • pursue, if relevant, site design and stormwater management that minimises any risk to the community. • Ensure workers and people using the facility during and after the upgrades are aware of the flood risk, for example by using signage. • develop an appropriate business emergency plan to assist in being prepared for, responding to and recovering from flooding. The NSW SES has a template 		<ul style="list-style-type: none"> • The Flood Assessment prepared by GHD considers the impact of the PMF. The location of the KWA remains above the PMF. • GHD has considered whether stormwater management is required in section 4 of their report. Due to the small increase in impervious area 	

Issue raised	Date received	Response	Reference
which can assist in this process: http://www.sesemergencyplan.com.au/ .		<p>(1.9%) there is no need for additional stormwater measures. The stormwater will discharge directly to Council's street drainage where it is conveyed to Cooma Creek.</p> <ul style="list-style-type: none"> In the event of a flood Cooma would be cut off from the south. Cooma Creek is likely to flood and would restrict access to the Monaro Hwy to the south. Access to the north and west and likely to be unimpeded. The duration of inundation as stated by GHD is likely to be less than an hour. In the event of a flood, patients and staff are recommended to shelter within the hospital until the flood levels pass. A mitigation measure will be imposed to require the preparation of an emergency plan in response to flooding. This shall also consider the provision of site signage in suitable locations. 	
Submission from a member of the public			
Location near a busy road.		In relation to the proximity to a busy road, the accommodation is proposed to be setback in excess of 10 metres from the Bombala Street frontage. An Acoustic Report has been prepared to be considered during the assessment process. The report provides recommendations to ensure the accommodation achieves internal acoustic amenity. There is an existing driveway and parking area to the south that will provide safe access from Bombala Street. Cooma Hospital is in need of Key Worker Accommodation, this location was selected for a range of reasons. These include but not limited to the retention of the open vista and sightlines to the heritage item, ability to be setback from the boundary, conveniently accessed from Bombala Street and minimizes conflict with existing hospital services.	Section 6.2.1 and 6.2.2
Close proximity of building to large oxygen storage device, which backs on to the outpatient building and is likely to need extending in coming years due to increased community demand.		The works are unlikely to have an impact on the location of the oxygen storage device that is located approximately 16 metres away from the accommodation. Any future plans for expansion will need to consider the location and proximity to all hospital assets.	
Consideration of heritage of the trees along the border of the hospital.		A Heritage Impact Assessment has been prepared to inform the assessment of the works. The Heritage Impact Assessment also considered the proposed tree removal and deemed this acceptable. It is noted that the trees were planted in 1960 following the demolition of former buildings in this location. They did not form part of the original curtilage of the item. Replacement planting is proposed, and a landscape plan has been prepared as part of the application.	Section 6.2.13
Consideration of available parking.		A Parking and Traffic Report has been prepared to inform the assessment of the works. The Traffic Consultant has	Section 6.2.1

Issue raised	Date received	Response	Reference
		determined that additional parking is not required and that there is sufficient parking available.	

5.2 Community and Stakeholder Engagement

Additional community and stakeholder engagement, outside the statutory consultation requirements, was not required.

A presentation was submitted to the Project User Group (PUG) which met on 8 March 2023. The Project User Group included representatives of the Southern NSW Local Health District. The Project Manager and Principal Architect STH presented the Site Analysis and Concept Design. The PUG endorsed the KWA Cooma Site Analysis and Concept Design.

6. Environmental Impact Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

Section 171(1) of the *Environmental Planning and Assessment Regulation* (2021) notes that when considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the environmental factors guidelines that apply to the activity.

The *Guidelines for Division 5.1 Assessments* (June 2022) apply to the activity. The relevant assessment considerations under Section 3 of these Guidelines are provided below:

Table 10: Summary of Environmental Factors Reviewed in Relation to the Activity

Relevant Consideration	Response/Assessment	
(a) Any environmental impact on a community?	<p>The proposed works will result in the construction of a two-storey building which will contain twelve (12) one-bedroom self-contained units. These units will be associated with specialists that visit the hospital.</p> <p>The Phase 2 Contamination Report (Appendix K) identified asbestos within the soil. An RAP was prepared (Appendix K) and determined that the site could be made suitable for key worker accommodation, as SAS will need to be prepared and a notice of completion of remediation works will be required to be undertaken in accordance with Section 4.15 of Resilience & Hazard SEPP. The Remediation works are considered Category 1 works and will require development consent from Council. Development consent for the Remediation works were granted</p> <p>The proposed building is positioned to the south of the heritage-listed original hospital building. The new building will be two storeys in height, compared to the single storey heritage building, however the design of the new building will see the two storey form step down from 8.7m to approx. 4.95m at the northern end to provide for an appropriate transition in scale, down towards the single storey heritage building.</p> <p>In addition, the setbacks of more than 10m from Bombala Street, will see the building generally align with the existing setback of the heritage item. This will enable some views from the south-east, along Bombala Street, to be maintained. It is noted that existing vegetation obscures the heritage building from this view at present.</p> <p>The proposed building will not result in any adverse overlooking due to separation from adjoining residential properties and any additional shadow will be cast within the hospital site.</p> <p>Originally the key worker accommodation was going to be single storey and be positioned at the north-east corner of the site. This view is uninterrupted and excellent views, of the heritage building, are obtained when driving south along Bombala Street from the town centre. The relocation of the building to the south is much better heritage outcome, in addition buildings use to exist in this location previously, as shown in the Heritage Impact Assessment at Appendix G.</p> <p>In addition, the recessive colour of the two-storey element will reduce the scale and the materials and finishes will articulate the building to reduce the scale, when viewed from the public domain.</p> <p>The accompanying Landscape Plan at Appendix I will increase plantings along the eastern boundary and southern elevation of the new building. This will assist in reducing the impacts of bulk and scale of the new building.</p> <p>During construction there will be minor increase in traffic and the positioning of the crane, that will install the prefabricated building, may cause some temporary disruption along Bombala Street, however, this will only occur while installation is happening, and traffic should be able to be managed adequately. A CMP will be required to be prepared via a Mitigation Measure.</p> <p>A visual analysis is also provided at Section 6.2.6. This demonstrates that the proposed building is acceptable and will not result in any unacceptable impacts.</p> <p>A mitigation measure will be imposed to require a Construction and Management Plan to be prepared prior to the commencement of works, this will manage all site activities, which should not interfere with day-to-day hospital operations as the site is separate of the main hospital buildings.</p>	-ve
		Nil ✓
		+ve
(b) Any transformation of a locality?		-ve

Relevant Consideration	Response/Assessment		
	<p>As discussed in point (a) and at Section 3.1.2 above and Section 6.2.6 below, the proposed building will not transform the site given its location and the vast extent of open space to the north and east of the heritage building.</p> <p>The proposed works will result in a new two-storey building in close proximity to a heritage item, original hospital building to the north and in close proximity to another heritage item at 108 Bombala Street, being a stone cottage residential dwelling. The design has been designed with consideration of heritage significance of both items and is considered to be an acceptable outcome, refer to the HIS at Appendix G and Section 6.2.8 below.</p> <p>The building scale, height, setbacks, separation and landscaping will result in a suitable built form that will be of an acceptable scale within the existing hospital and surrounding built form.</p> <p>The provision of modern key worker accommodation that is required to meet the changing needs of the hospital specialists is supported in this instance.</p>	Nil	
		+ve	✓
(c) Any environmental impact on the ecosystems of the locality?	<p>No impact. The site is located a significant distance from the wetlands and river systems.</p> <p>Twelve (12) trees will be removed to facilitate the works. However, the trees are all exotic and does not form part of any EECs, refer to Arborist Report at Appendix J. Replacement planting will compensate for the loss.</p>	-ve	
		Nil	✓
		+ve	
(d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?	<p>As discussed above, the proposed works will not transform the Bombala Street frontage of the site but will provide a suitable built form that is of a scale suitable for the surrounding buildings. The combination of recessive colours in the two-storey building and stepping down of the northern end from 8.7m to approx. 4.95m will create an appropriate transition for the adjoining heritage item, which is single storey. Visually the currently vacant section of the site will be enhanced with well-designed building and improved landscaping (Appendix I) will result in an acceptable design outcome for the site to service the needs of the locality.</p>	-ve	
		Nil	
		+ve	✓
(e) Any effect on locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations?	<p>As discussed in Table 7 above, the site is listed as a heritage item on the s170 register and in the LEP. The listing relates to the original hospital building, which is positioned to the north of the proposed building.</p> <p>The Heritage Impact Assessment attached at Appendix G has determined that the proposed development is a suitable outcome and will not detrimentally affect the adjoining heritage item.</p> <p>The original proposal sought to construct single storey buildings to the north of the heritage building. By repositioning the new building to the south, although now two storeys in height, this is an improved heritage outcome, as the heritage building is best viewed from the north on Bombala Street and Victoria Street and the original design would have obscured this vista and curtilage.</p> <p>As discussed in Point (a) above and Section 6.2.6 and 6.2.8 below, the proposed development is suitable for the site and has been suitably designed to minimise impacts on the adjacent and nearby heritage item.</p> <p>The significance of the original hospital building will not be adversely impacted, and future generations will be able to continue to appreciate the heritage significance of the evolution of the wider hospital site from the 1800s to now and beyond.</p>	-ve	
		Nil	✓
		+ve	
(f) Any impact on the habitat of protected animals, within the meaning of the <i>Biodiversity Conservation Act 2016</i> ?	<p>No impact likely, a Mitigation Measure will require compliance with the Arborist Report, which requires a fauna assessment to be undertaken prior to demolition.</p>	-ve	
		Nil	✓
		+ve	
(g) Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air?	<p>No impact likely. The trees are introduced species, refer to Appendix J. In addition, they were planted after the 1960s and so therefore were not part of the original curtilage of the heritage item.</p>	-ve	
		Nil	✓
		+ve	
(h) Any long-term effects on the environment?	<p>There will be no long-term impacts on the environment. All works will result in positive long-term changes for the wider community by the provision of important key worker</p>	-ve	
		Nil	

Relevant Consideration	Response/Assessment		
	accommodation. The detailed landscape design will minimise the effects and complement the design of the key worker two-storey accommodation building.	+ve	✓
(i) Any degradation of the quality of the environment?	The proposed works will include tree removal (refer to Appendix J), however, trees will be required to be replanted or transplanted (where possible) to suitable locations within the site, at a minimum rate of 1:1. Although there will be the loss of twelve (12) trees, the works will seek to improve the landscaping within the site, as demonstrated on the Landscape plans attached at Appendix I . Mitigation measures will ensure that the landscaping works are endorsed and finalised.	-ve Nil +ve	 ✓
(j) Any risk to the safety of the environment?	The Phase 2 Contamination Report, found at Appendix K , has identified asbestos on the site. The RAP also found at Appendix K , has determined that the site can be made suitable, subject to conditions being met. As the works are considered Category 1 Remediation, Development consent under Part 4 is required. DA10.2023.238.1 was approved by Council on 28.9.2023. The Remediation works will be undertaken in accordance with the conditions of consent found at Appendix K . The are no other risks to the safety of the environment.	-ve Nil +ve	 ✓
(k) Any reduction in the range of beneficial uses of the environment?	The proposed development will provide much needed on-site key worker accommodation, there will be no reduction in uses and no increase in staff, within the hospital. Therefore, the provision of the new accommodation will remain beneficial and will continue to service the local community.	-ve Nil +ve	 ✓
(l) Any pollution of the environment?	Subject to mitigation measures, to control construction works, there will be no unreasonable adverse pollution impacts from the construction of the cabins.	-ve Nil +ve	
(m) Any environmental problems associated with the disposal of waste?	Refer to Appendix K , asbestos has been identified on the site, any fill that is required to be removed must have the waste classified prior to disposal. A mitigation measure will be included to ensure appropriate steps are taken to remediate the site. A waste management plan for both construction works, and use is required via a mitigation measure prior to commencing works.	-ve Nil +ve	 ✓
(n) Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply?	No impact.	-ve Nil +ve	 ✓
(o) Any cumulative environmental effects with other existing or likely future activities?	A review of the NSW Planning website and Snowy-Monaro Regional Council website shows that there are no planning proposals, regional applications and or current development applications that will significantly impact on the proposal. There are no other significant construction activities occurring in the vicinity of the hospital. The surrounding streets and site itself can accommodate construction worker vehicles during works without adverse impact on hospital parking. Refer to Traffic report at Appendix L .	-ve Nil +ve	 ✓
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?	No impact.	-ve Nil +ve	 ✓
(q) Applicable local strategic planning statement, regional strategic plan or district strategic plan made under Division 3.1 of the Act?	<u>Snowy Monaro LSPS 2020</u> The LSPS was adopted by Council on 21 May 2020. Providing additional key worker accommodation within the hospital won't be inconsistent with the LSPS, which identifies Cooma as being the biggest town in the region and a hub with hospital facilities. The key worker accommodation is consistent with the land use of the site. <u>Draft Southeast and Tablelands Regional Plan 2041</u> The draft regional plan acknowledges upgrades to the Cooma Hospital and the proposed key worker accommodation will support the strategic vision of the regional plan. This proposal will strength healthcare and services in the Snowy-Monaro region and is highly consistent with the draft plan.	-ve Nil +ve	 ✓

Relevant Consideration	Response/Assessment	
(r) Any other relevant environmental factors?	No other environment factors	-ve
		Nil ✓
		+ve

6.2 Identification of Issues

6.2.1 Traffic, Access and Parking

Questions to consider	Yes	No
Will the works affect traffic or access on any local or regional roads?	Yes – a crane will be required to be parked along the kerb on Bombala Street. Refer to the Traffic Management Plan at Appendix L , a mitigation measures will be imposed to address this in a CMP and also to obtain relevant approvals for use of the road, given this road is a State owned road.	
Will the works disrupt access to private properties?		No
Are there likely to be any difficulties associated with site access?		No
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)?	Yes – residential properties positioned opposite on Bombala Street and hospital uses to the south, east and north may be affected by construction activities. However, the site is surrounded by streets on all sides and the Construction Management Plan can suitably address and traffic management issues during construction.	
Will full or partial road closures be required?	Yes – as discussed above, a crane will be required to be parked along the kerb on Bombala Street. Refer to the Traffic Management Plan at Appendix L , a mitigation measures will be imposed to address this in a CMP and also to obtain relevant approvals for use of the road, given this road is a State-owned road.	
Will the proposal result in a change to onsite car parking?		No

Questions to consider	Yes	No
Is there onsite parking for construction workers?	Up to 25 staff will be on-site at times. It is likely that staff will utilise parallel parking along Bombala Street and Bent Street, which are not time-limited spaces. A mitigation measure will be included to require a CMP to be prepared prior to commencement of works, the CMP will need to address construction worker parking.	

A mitigation measure has been included at **Appendix Q**, to require the preparation of a Construction and Traffic Management Plan prior to the commencement of works to ensure that the works are managed adequately to reduce impacts during works. This will also address parking for construction workers.

No additional car parking is required, at present specialist staff park on-site when visiting patients and currently stay off-site. Therefore, there is no increase in demand. In addition, the surrounding streets contain unlimited parking spaces, without time restrictions.

A mitigation measure is recommended to ensure relevant approvals are obtained from Council, to allow a crane to be positioned along Bombala Street.

6.2.2 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)?	Yes. Refer to discussion below.	
Will any receivers be affected by noise for greater than three weeks?	Yes. Refer to discussion below.	
Are there sensitive land uses or areas that may be affected by noise from the proposal during operation?	Yes. Refer to discussion below.	
Will the works be undertaken outside of standard working hours? That is: <ul style="list-style-type: none"> Monday - Friday: 7am to 6pm; Saturday: 8am to 1pm; Sunday and public holidays: no work. 	Yes. Any extension of time will require a separate approval.	
Will the works result in vibration being experienced by any surrounding properties or infrastructure?	Yes, an acoustic report has been prepared and is attached at Appendix M . Works will be undertaken in accordance with the acoustic report.	
Are there any impacts to the operation of helipads on the activity site?		Not likely. Refer to discussion below.

The Acoustic Report at **Appendix M** determines that the proposed works will satisfy the following documents:

- Snowy Monaro Regional Council—'Cooma-Monaro Development Control Plan 2014 (Amendment 4)'; and
- NSW Department of Environment and Heritage, Environmental Protection Authority document—'Noise Policy for Industry (NPfI) 2017'.

A mitigation measure will be included to ensure compliance with the acoustic report during construction works.

In addition, a mitigation measure will be imposed to require a detailed Construction Noise and Vibration Management Plan to be prepared and submitted for approval prior to the commencement of works. This report will need to take into consideration the following documents:

- NSW Interim Construction Noise Guidelines (DECC 2009)*

- *Noise Policy for Industry (EPA, 2017).*
- *Assessing Vibration: a technical guideline (Dec. 2006).*

It is noted that under TI SEPP if the site is positioned on a state road with more than 20,000 vehicles passing every day, referral to the RMS may be required. According to TfNSW database, Bombala Street / Monaro Hwy contains significantly less than 20,000 vehicles a day. As such, referral is not required.

The helicopter landing site is located approximately 140m to the south-west of the proposed building. The building is proposed in a location that is partly occupied by trees which range in height between 8 to 12 metres. Specifically the tree to the west of the accommodation towards the helipad is 12 metres in height. The proposed building has a maximum height of 8.95m and therefore sits below the current limitations of a flight path in this location. It is therefore considered that given the height of existing trees and the height of the building; it will not impact on the operation of the helipad.

Notwithstanding, a mitigation measure will be included to the helipad/helicopter operations on the hospital site remain of safe operation during construction.

6.2.3 Air Quality and Energy

Questions to consider	Yes	No
Could the works result in dust generation?	Possibly – during construction works.	
Could the works generate odours (during construction or operation)?	Yes – minor from construction activities.	
Will the works involve the use of fuel-driven heavy machinery or equipment?	Yes - during site preparation works and when installing the prefabricated building.	
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?	Yes – within a hospital and opposite residential uses.	

Potential impacts on air quality may occur during works.

Dust can be generated by the following activities:

- Site clearing
- Construction activities
- Stockpiling
- Transfer of materials to trucks for transport
- Vehicle movements
- Construction works.

To minimise the emission of dust during works, appropriate mitigation measures will need to be imposed during works including:

- Dampening exposed surfaces in windy conditions
- Covering loads on vehicles hauling materials to and from work sites
- Installation of appropriate site fencing
- Sealing of all hoardings with plastic or an alternative dust proof application
- External scaffolding to be installed with dust minimising shade cloth

- All waste storage compartments and skips to be appropriately covered and secure
- Ensure return air ductwork within the site is properly managed to mitigate the spread of dust to other areas of the hospital.

6.2.4 Soils and Geology

Questions to consider	Yes	No
Will the works require land disturbance?	Yes – prior to the installation of the prefabricated building and during landscaping works	
Are the works within a landslip area?		No
Are the works within an area of high erosion potential?		No
Could the works disturb any natural cliff features, rock outcrops or rock shelves?		No
Will the works result in permanent changes to surface slope or topography?	Yes – removal of some soil will alter the slope of the land, prior to construction of footings and above ground slab along with landscaping works.	
Are there acid sulfate soils within or immediately adjacent to the boundaries of the work area? And could the works result in the disturbance of acid sulfate soils?		No – site not affected by ASS.
Are the works within an area affected by salinity?		No
Is there potential for the works to encounter any contaminated material?	Yes. Refer to discussion below.	

The contamination report and RAP at **Appendix K**, concluded that the soil around the site is contaminated with asbestos. However, the RAP has determined that the site can be made suitable for the proposed development.

Mitigation measures will be included to require compliance with the RAP during works and submission of a Site Audit Statement, prior to use, to confirm that the remediation works have been undertaken and completed in accordance with the RAP. This is discussed further in Section 6.2.13 below.

A mitigation measure will be imposed to require an Erosion and Sediment Control Plan to be prepared in accordance with the Erosion and sediment control - Managing Urban Stormwater: Soils and Construction (Landcom, 2004) (the Blue Book).

6.2.4 Coastal risks

Questions to consider	Yes	No
Are the works affected by any coastal risk/hazard provisions?		No
Is any coastal engineering advice required, proportionate to the proposed activity?		No

6.2.5 Hydrology, Flooding and Water Quality

Questions to consider	Yes	No
Are the works located near a natural watercourse?		No
Are the works within a Sydney Drinking Water Catchment?		No
Are the works located within a floodplain?	Yes – see discussion below.	
Is the development activity located above Probable Maximum Flood Levels?	Yes – see discussion below.	
Will the works intercept groundwater?		No
Will a licence under the <i>Water Act 1912</i> or the <i>Water Management Act 2000</i> be required?		No
Has stormwater management been adequately addressed?	Yes – see discussion below	

As the site is Flood Affected, a Flood Impact Assessment Report was prepared by GHD dated 3 April 2023 and attached at **Appendix N**. The Flood Assessment prepared by GHD considers the impact of the PMF on the location of the accommodation and the wider hospital in terms of evacuation. The location of the KWA remains above the PMF, however in the event of a flood Cooma would be cut off from the south.

Cooma Creek is likely to flood and would restrict access to the Monaro Hwy to the south. Access to the north and west and likely to be unimpeded. The duration of inundation as stated by GHD is likely to be less than an hour. In the event of a flood, patients and staff are recommended to shelter within the hospital until the flood levels pass.

A mitigation measure will be imposed to require the preparation of an emergency plan in response to flooding. This shall also consider the provision of site signage in suitable locations.

GHD has considered whether stormwater management is required in section 4 of their report. Due to the small increase in impervious area (1.9%) there is no need for additional stormwater measures. The stormwater will discharge directly to Council's street drainage where it is conveyed to Cooma Creek. Civil plans are attached at **Appendix O**.

6.2.6 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?	Yes – see discussion below.	
Will the works be visible from the public domain?	Yes – see discussion below.	
Are the works located in areas of high scenic value?		No
Will the works involve night work requiring lighting?		No

The proposed works will be visible from the public domain and residential properties along Bombala Street and Victoria Street. The following images identify the view from the southern approach (Snowy Mountain Highway) along Bombala Street, the red star identifies the location of the new works.

As shown in **Figure 13** below, the new building will be visible, however, the recessive colours of the two-storey building will blend into the surrounds given the existing trees and distant ranges. In addition, it is noted that the existing heritage building is not visible from this view due to existing vegetation.

The proposed building will be two storeys in height, which varies from the single storey dwellings in the photograph. However, the setback of 10.661m from Bombala Street combined with recessive colours of the building, retained vegetation and existing hospital buildings will ensure the built form will be of an acceptable scale and form.

It is noted that there are no sightlines to the original 'heritage-listed' hospital building, which is positioned to the north of the new building, therefore no impact on the curtilage of the heritage building.



Figure 13: Looking north towards the Subject site from the Snowy Monaro Highway

Figure 14 below illustrates the view towards the subject site near Albert Street, the red circle shows the trees that will be removed to enable construction of the building. The building will be highly visible at this point. However, the setbacks combined with recessive colours and retained vegetation will ensure that the impact is not detrimental. In addition, the side (southern elevation) contains various materials and finishes combined with balustrade and screening, as shown in **Figure 15** below. The proposed landscaping once established will assist in screening the visibility of the building.



Figure 14: Looking north along Bombala Street near intersection with Albert Street.



Figure 15: Perspective of Bombala Street elevation (source: Kearney Architecture)

Figure 16 below looks directly to west from Bombala Street. This view point is where the new building will be highly visual until the replacement planting is established. Notwithstanding, the building is setback over 10.6m from the front boundary. The smaller trees that are to be removed, are unlikely to have any heritage significance as they were planted after the 1960s when the previous building in this location was demolished.

The yellow circle highlights a retained mature tree within the hospital site, positioned to the south-east of the heritage-listed heritage building. This tree will remain in-situ and given the step down of the proposed building in the architectural drawings and as shown below in **Figure 16**, the proposed height of the key worker accommodation is suitable when combined with recessive colours, step down in height at the northern end, generous front setback and the retention of the tree. In addition, significant planting will occur between the boundary and the eastern elevation of the new building which will lessen the bulk and scale when viewed from the public domain, refer to Landscape Plans at **Appendix I**.



Figure 16: Looking West from Bombala Street, directly towards the site of the new building (source: Google Maps)

In **Figure 17**, below, the red rectangle shows approximate location of the new building and the original heritage-listed hospital building, which is more visible from this angle, from Bombala Street. The hospital was built in 1867 and is positioned to the right of the verandah that can be seen in this photograph. The verandah was part of the 1878-79 addition, as shown in **Figure 18** below. As such, the earliest part of the building is obscured from view by later additions and existing vegetation.

The view of the new building will be visible to passing motorists, pedestrians and residents on the eastern side of Bombala Street until the replacement landscaping is established.



Figure 17: Looking west towards the original hospital building, from Bombala Street, which is positioned to the north of the new building.

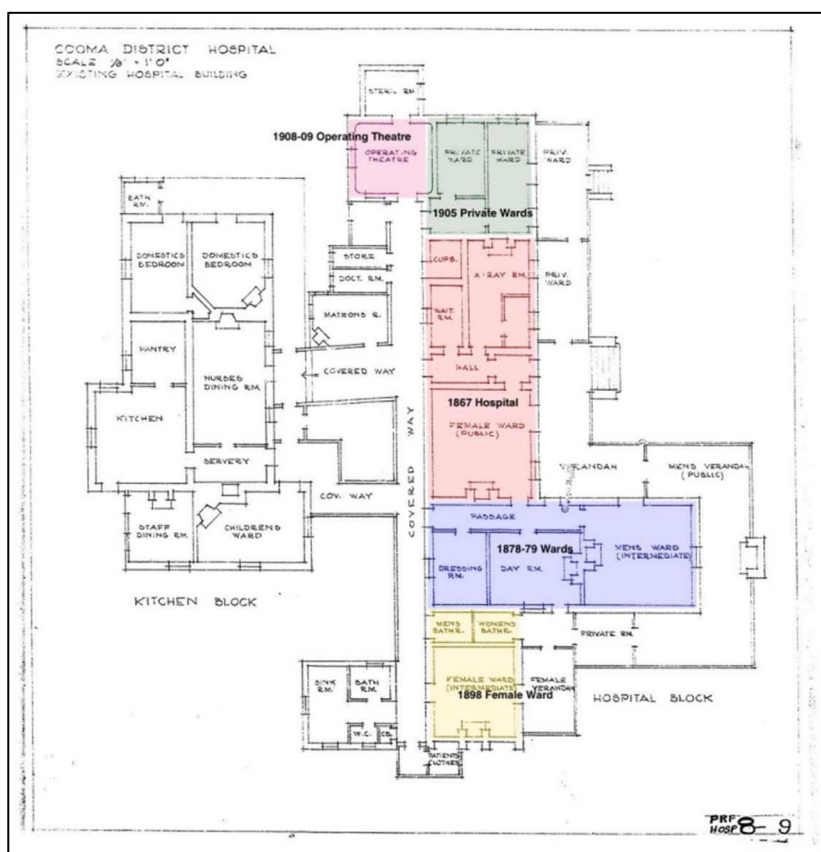


Figure 18: Plan showing the main construction phases associated with the heritage-listed hospital building. (Source: NBR's Heritage Impact Statement dated April 2024)



Figure 19: Architectural eastern elevation of the proposed building (Source: Kearney Architecture)

The southern approach, along Bombala Street, has the most significant vista towards the heritage-listed hospital building, as shown in **Figure 20** below. The existing vegetation and setbacks will obscure the view of the new building for motorists, residents and pedestrians. The heritage building will retain its full appreciation from this angle.



Figure 20: Looking south along Bombala Street from Victoria Street intersection, original heritage-listed hospital building shown circled in red. (Source: Google Maps)

Figure 21 below, illustrates the most significant vista for the heritage-listed original hospital building. By positioning the new key worker accommodation to the south of the existing building this prominent sightline is retained. This enables clear sightlines from adjoining residential properties and the public domain.

Distant views of the new building may be visible from this location, however, the recessive colour of the second storey combined with the retained vegetation will ensure that the bulk and scale is acceptable. In addition, the recessive colour will ensure that the roofline of the heritage-listed building remains visible.



Figure 21: Looking south along Bombala Street, original heritage-listed hospital building shown circled in red. (Source: Google Maps)

In **Figure 22** below, shows the view of the heritage item from Victoria Street. Given the topography of the land and location of the existing heritage building, it is unlikely that the key worker accommodation will be visible. The previous option to locate the building in the foreground of the heritage building, would have been detrimental to the appreciation and enjoyment of the item

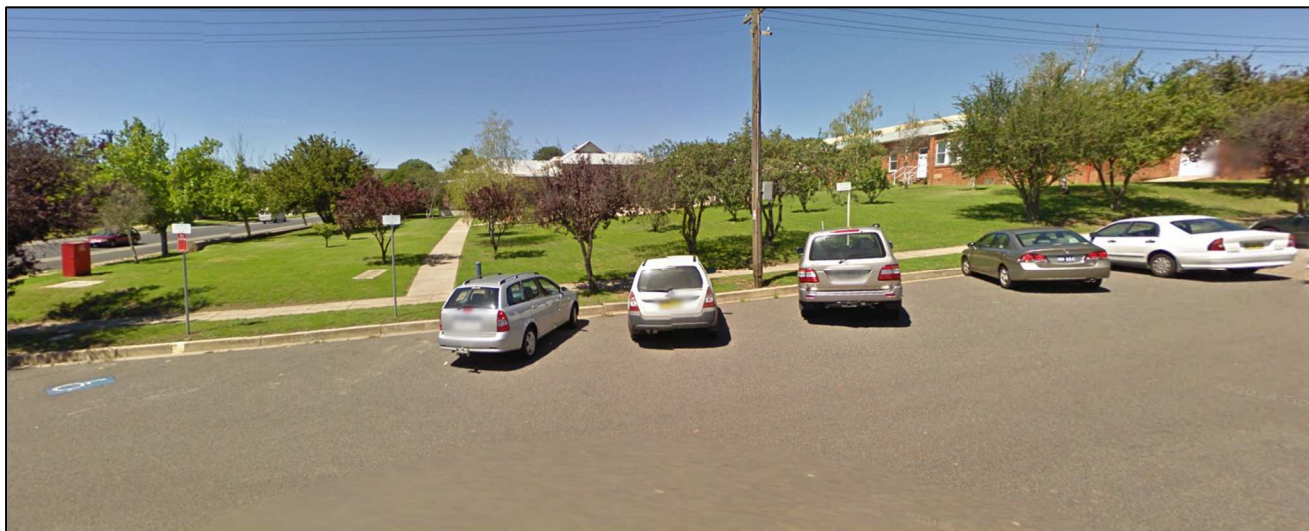


Figure 22: Looking south from Victoria Street towards the heritage-listed original hospital building.

The red rectangle in the aerial image below in **Figure 9** identifies the residential properties along Vale Street. The existing hospital buildings will obscure the new building from these properties. In addition, the separation between the dwellings and new building will ensure that bulk and scale impacts are not detrimental.



Figure 9: Aerial view of the subject site (Source: Nearmap)

Based on the above, it is considered that the location of the building to the south of the existing heritage-listed building is a better planning outcome. The visual impacts from the new two-storey building have been minimised by consideration of the setbacks, retained and proposed vegetation, recessive finishes and its proximity to the heritage item.

The proposed development is acceptable and will not result in any detrimental visual amenity.

6.2.7 Aboriginal Heritage

Questions to consider	Yes	No
Will the activity disturb the ground surface or any culturally modified trees?	Yes – works will disturb the ground and twelve (12) trees will be removed.	
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)?		No
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)?		No
Will the works occur in the location of one or more of these landscape features and is on land not previously disturbed?		No
<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. 		
If Aboriginal objects or landscape features are present, can impacts be avoided?		Non identified
If the above steps indicate that there remains a risk of harm or disturbance, has a desktop assessment and visual inspection been undertaken?		No
Is the activity likely to affect wild resources or access to these resources, which are used or valued by the Aboriginal community?		No
Is the activity likely to affect the cultural value or significance of the site?		No

A due diligence assessment was performed on 21 March 2023 and no Aboriginal sites or places were identified on and/or within the vicinity of the subject site. Attached at **Appendix H**.

6.2.8 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?	Yes – see discussion below.	
<ul style="list-style-type: none"> • NSW heritage database (includes Section 170 and local items); • Commonwealth EPBC heritage list. 		
Will works occur in areas that may have archaeological remains?		No
Is the demolition of any heritage occurring?		No

The subject site is listed on both the s170 register and is also a local heritage item within the Cooma-Monaro LEP 2013. Refer to Heritage Impact Assessment at **Appendix G**.

In addition, the proposed development is within close proximity to a nearby heritage item, known as 108 Bombala Street, being a single storey stone residential cottage. The Heritage Impact Assessment has determined that there is no impact, refer to **Appendix G**.

The proposed building has been positioned to have a setback of at least 10m to generally match the setback of the heritage listed original hospital building. In addition, the two storey form steps down from two-storeys (8.95m) to one-storey at the northern end (4.95m) as shown below and highlighted by the red circle in **Figure4**:

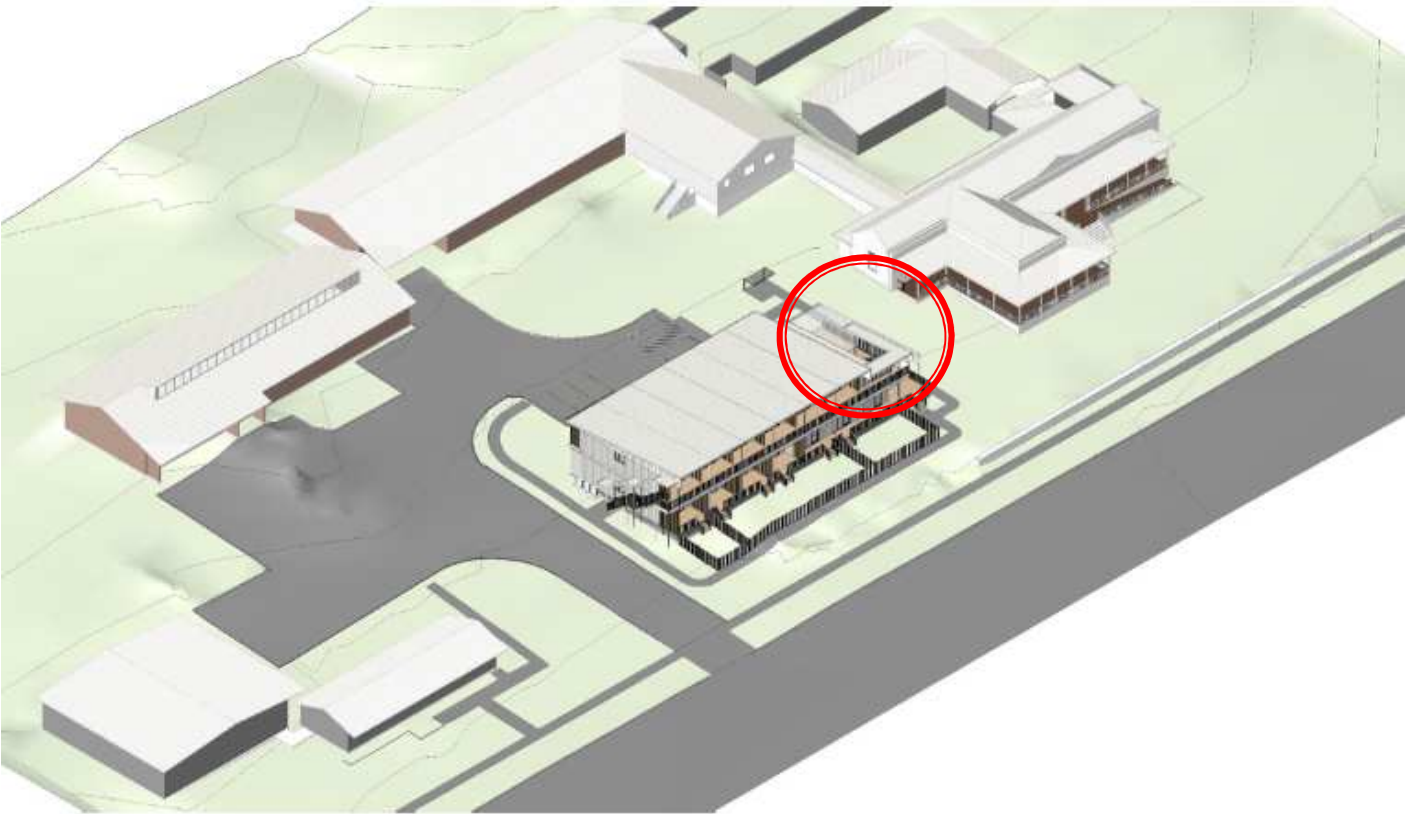


Figure 24: Contextual Study (Source: Kearne Architects)

In addition, the recessive colour of the two-storey element and lighter colour and light weight structure of the single storey component creates acceptable transition and sale to minimise impacts on the heritage listed building. This is discussed in detail in Section 6.2.6.

Currently views to the original hospital building from the south are obscured by existing vegetation so the position of the proposed building is preferred to Option 1, which would have seen a building positioned in the north-east corner of the site, completely obscuring the heritage item.

The proposed Landscape Plan at **Appendix I** will replant plants at minimum rate of 1:1 along the eastern frontage and also southern side of the building. This will improve the natural environment on the site, given twelve (12) trees require removal and will also lesson the bulk and scale of the new building when viewed from the public domain. It is noted that buildings have previously been positioned in the location of the new building, therefore the trees proposed to be removed were planted after the 1960s and are not likely to have any heritage significance, refer to photographs in the Heritage Impact Assessment at **Appendix G**.

Overall, the proposed design will have the least impact on the heritage building and will ensure the primary vistas, to the original heritage building, are maintained from the north-west. The setting back of the new building is a positive outcome to ensure that the original hospital building maintains an appropriate setting.

6.2.9 Ecology

Questions to consider	Yes	No
Could the works affect any <i>Environmental Protection and Biodiversity Conservation Act 1999 (Cth)</i> listed threatened species, ecological community or migratory species?		No – refer to Arborist Report at Appendix J .
Is it likely that the activity will have a significant impact in accordance with the <i>Biodiversity Conservation Act 2016 (BC Act)</i> ? In order to determine if there is a significant impact, the REF report must address the relevant requirements of Section 7.2 of the BC Act:		No

Questions to consider	Yes	No
<ul style="list-style-type: none">Section 7.2(a) – Test for significant impact in accordance with Section 7.3 of the BC Act;Section 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?		No
Is there any important vegetation or habitat (i.e. Biodiversity and Conservation SEPP) within or adjacent to the work area?		No
Could the works impact on any aquatic flora or habitat (i.e. seagrasses, mangroves)?		No
Are there any noxious or environmental weeds present within the work area?		No
Will clearing of native vegetation be required?		No

Figure 10 below identifies the trees proposed for removal. A total of nine (9) trees require removal to enable the development to be constructed but in addition a further three (3) trees require removal as they are not viable for retention as they are diseased, have poor health and/or have defects. In addition, all trees are exotic and not part of any EECs.

Refer to the Arborist Report at **Appendix J**.

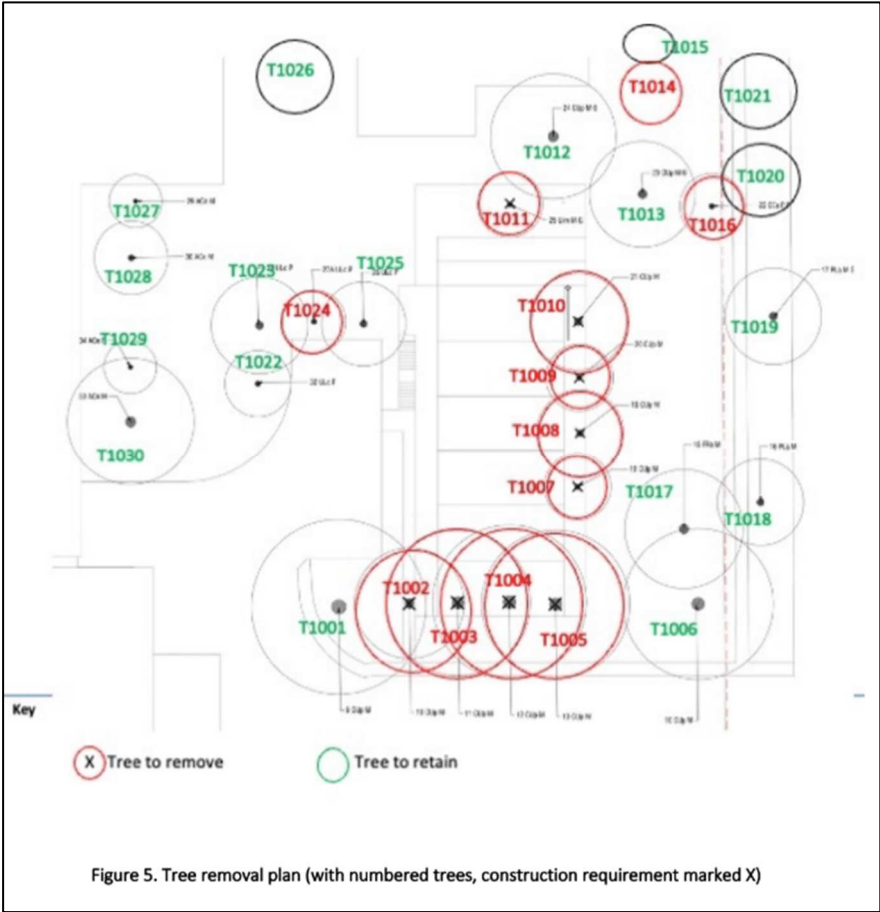


Figure 10: Extract from Arborist Report illustrating Trees to be removed and retained (Source: Arborist Report prepare by Abel Ecology dated 10/02/23)

Mitigation measures will be included to ensure all tree removal and protection, of retained trees, is undertaken in accordance with the Arborist Report and also to require replacement trees to be planted at a minimum rate of 1:1 in a suitable location on site and also the option to transplant trees identified as T1007, T1008, T1009 and T1010, as they are young enough to be transplanted. This will be included in the relevant mitigation measure/s.

6.2.10 Bushfire

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

6.2.11 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?		No
Will the works involve the installation of structures or services that may be perceived as objectionable or nuisance?		No
Will the works impact on or be in the vicinity of other services?		No

6.2.12 Waste Generation

Questions to consider	Yes	No
Will the works result in the generation of non-hazardous waste?	Yes – see discussion below.	
Will the works result in the generation of hazardous waste?	Yes – see discussion below.	
Will the works result in the generation of wastewater requiring off-site disposal?		No
Will the works require augmentation to existing operational waste management measures?	Yes – see discussion below.	

There is always risk that more may be uncovered during works, which have not been found within the site, as such appropriate mitigation conditions are recommended should more hazards which may be identified during construction works.

A mitigation measure shall require all waste to be classified as per the NSW EPA guidelines and may only be disposed of at a licensed waste facility.

See contamination discussion below, as asbestos was identified through on-site testing. Refer to Detailed Phase 2 and RAP reports at **Appendix K**.

Each unit will contain its own waste and recycling bins. These will be transferred to the waste collected area adjacent to the ambulance bay.

A Waste Management Plan for during construction and operational plan will be required, prior to the commencement of works.

6.2.13 Hazardous Materials and Contamination

Questions to consider	Yes	No
Is there potential for the works to encounter any contaminated material?	Yes	
Is there potential for the works to disturb or require removal of asbestos?	Yes – see discussion below.	

Is the work site located on land that is known to be or is potentially contaminated?	Yes – see discussion below.
Will the works require a Hazardous Materials Assessment?	No
Is a Remediation Action Plan (RAP) required to establish the proposed activity?	Yes – attached at Appendix K.
Is the remediation work category 2 works under Resilience and Hazards SEPP?	No

A Phase 2 Contamination Report has been prepared and accompanies this REF at **Appendix K**. The report concluded:

Remediation of the site is required to address the asbestos contamination in fill. We consider that the site can be made suitable for the proposed development provided that the following recommendations are implemented:

- 1. Prepare an AMP (for asbestos in/on soil) to manage the site;*
- 2. Preparation and implementation of a RAP; and*
- 3. Preparation of a validation report on completion of remediation.*

As a result a Remedial Action Plan (RAP), refer to **Appendix K**, was prepared and concludes that the site can be made suitable.

The report identified that the works were likely defined as Category 2.

Notwithstanding the above, the site is identified as a heritage item (refer to Heritage Impact Assessment at **Appendix G**) and is also affected by flooding (minor impact along the eastern side), refer to **Appendix N**.

Therefore the works are Category 1 works under Section 4.8(e)(ii) of the SEPP as the remediation works are carried out on land that is identified as a heritage item under an environmental planning instrument. Category 1 works require development consent to be obtained. Development consent for the remediation works has been obtained from Snowy Monaro Council. DA10.2023.238.1 was approved by Council on 28.9.2023. The Remediation works will be undertaken in accordance with the conditions of consent found at **Appendix K**.

The DA approved the works identified by the RAP which showed the occurrence of asbestos in the form of bonded/non-friable ACM on/in fill at ground surface and propose to undertake the following combined remediation strategies:

- excavation and off-site disposal of contaminated fill/soil to a suitably licensed landfill; and
- in-situ capping and long-term management of the capped areas via an EMP.

Section 5 of the RAP, attached at **Appendix K**, outlines the anticipated sequence of remediation works, these shall be incorporated into a mitigation measure.

The RAP concludes the following:

We are of the opinion that the site can be made suitable for the proposed development via remediation and the implementation of this RAP. A site validation report is to be prepared on completion of remediation activities and submitted to the consent authority to demonstrate that the site is suitable for the proposed development following completion of remediation/validation. An EMP will also be prepared to manage the asbestos impacted fill capped on site as part of the remediation. The EMP will provide a passive management approach and is not expected to impose onerous constraints on the day-to-day site use under the proposed development scenario

Based on the above and subject to mitigation measures, the site can be made suitable for the intended use.

Mitigation measures will be included to require compliance with the RAP (under DA10.2023.238.1) during works and require the submission of a Site Audit Statement, prior to use, to confirm that the remediation works have been undertaken and completed in accordance with the RAP.

Notices of completion of all remediation work must be in accordance with Section 4.14 and Section 4.15 of the Resilience and Hazards SEPP. This will be included in a Mitigation Measure, refer to **Appendix Q**.

6.2.14 Sustainability and Climate Resilience

Questions to consider	Yes	No
Does the activity ensure the effective and efficient use of resources (natural or other)?	Yes – see discussion below.	
Does the activity use any sustainable design measures?	Yes – see discussion below.	
Are climate resilient design measures to be incorporated in the activity?	Yes – see discussion below.	

Refer to the Design Report at **Appendix B**, Section 3.6 outlines the sustainability provisions, and they are outlined below:

Supporting sustainable objectives, off site fabrication results in reduced building waste through the construction process and a high level of recycling of the building waste produced. Sustainable outcomes realized through the prefabrication process include:

- *Reduction in building waste by 80% when compared to traditional construction*
- *Recycling process for building waste that does occur*
- *Recycling process for building waste that does occur*
- *Improved building sealing and insulation*
- *Renewable timber construction over structural steel subframe*
- *End of life recyclability*

Fixtures and fittings will be selected to provide efficiency for both water and energy use, aligning with and exceeding the requirements of the NCC.

A mitigation measure will be included to ensure the building achieves the equivalency of a 4-star Green Star Rating under Design Guidance Note No. 058.

6.2.15 Community Impact/Social Impact

Questions to consider	Yes	No
Is the activity likely to affect community services or infrastructure?		No
Does the activity affect sites of importance to local or the broader community for their recreational or other values or access to these sites?		No
Is the activity likely to affect economic factors, including employment numbers or industry value?	Yes – up to 25 construction workers will be employed for the duration of works, which is positive outcome.	
Is the activity likely to have an impact on the safety of the community?		No – a CMP is required to ensure the site works are managed safely.

Questions to consider	Yes	No
Will the activity affect the visual or scenic landscape?	Yes – see discussion below.	
Is the activity likely to cause noise, pollution, visual impact, loss of privacy, glare or overshadowing to members of the community, particularly adjoining landowners?	Yes – see discussion below.	

The proposed two-storey building has been carefully placed to be setback from boundaries and will be no higher than 8.7m reducing to approx. 4.95m in height at the northern end. The built form combined with existing and proposed landscaping will result in appropriate built form on this site and the setbacks, building separation, varied height, materials and finishes will ensure that the impact to surrounding properties is minimal. The shadow cast by the building falls primarily on the existing driveway and carparking area.

The position of the building to the south of the existing heritage-listed original hospital building is the preferred approach, original it was to be positioned to the north and this would have resulted in a detrimental impact from obscuring the building when viewed from the north of Bombala Street. Currently the building is generally obscured when approaching from the south and existing vegetation assist in reducing sightlines, hence this position being the most suitable.

The buildings will not result any overshadowing of nearby properties, they will be suitably separated from adjoining residential properties, therefore maintaining privacy and the only noise impacts will be associated with construction works, which will be suitably managed for the 2 months of construction.

The proposed landscaping design is a positive outcome that will improve the visual appearance and the amenity of the site, refer to Landscape Plan at **Appendix I**.

The accompanying Design Report at **Appendix B** addresses the CPTED principles and the proposed development has been designed to address these principles.

Overall, the proposed key worker accommodation building is suitable for the site and the scale of the building combined with setbacks and landscaping will minimise impacts when viewed from the public domain.

6.2.16 Cumulative Impact

Questions to consider	Yes	No
Has there been any other development approved within 500m of the site?		No
Is there any transformation planned within 500m of the site?		No
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?		No
Is the activity likely to result in further significant impacts together with other development planned, approved or under construction within 500m of the site?		No
Has a cumulative impact statement, proportionate to the activity, been included in REF documentation? If no – why not?		No –No significant projects identified in the locality.

A search of the following registers was undertaken:

- Department of Planning and Environment – major project register;
- Sydney and Regional Planning Panels Development and Planning Register; and
- Snowy Monaro Regional Council development application register.

No significant development applications were identified within 500m of the site.

7. Summary of Mitigation Measures

Mitigation measures are to be implemented for the proposal to reduce impacts on the environment. The mitigation measures are provided at **Appendix Q**.

7.1 Summary of 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 considered 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.

8. Justification and Conclusion

The proposed construction of a two-storey key worker accommodation building for up to twelve (12) occupants at Cooma Hospital and Health Service 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 proposal 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 generally 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 activity is not likely to significantly affect threatened species, populations, ecological communities or their habitats, and therefore it is not necessary for a Species Impact Statement and/or a BDAR to be prepared. 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 of the EP&A Act. On this basis, it is recommended that HI determine the proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this report.