

HEALTH INFRASTRUCTURE

Addendum Review of Environmental Factors

Cooma Hospital and Health Service– Key Worker Accommodation

4 July 2024

Version 1



HI Planning Document Control

Version	Date	Author	Description	Reviewed by	Approved by
1	4/7/2024	LJB Urban Planning	REF Addendum Cooma KWA	Larissa Brennan	Larissa Brennan

Declaration

This Addendum Review of Environmental Factors (Addendum REF) has been prepared for Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from amendments to the works for construction of key workers accommodation at Cooma Hospital and Health Service, 2A Bent Street, Cooma.

A REF for key worker accommodation was endorsed by HI on 19/06/2024. This Addendum 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* (TISEPP).

This Addendum REF provides a true and fair review of the activity in relation to its likely impact on the environment addresses to the fullest extent possible, all the factors listed in Section 3 of the Guidelines for Division 5.1 Assessments (June 2022), the EP&A Regulation and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC ACT).

Based upon the information presented in this Addendum REF, it is concluded that, subject to adopting the recommended mitigation measures, it is unlikely there would be any additional significant environmental impacts associated with the activity. Consequently, an *Environmental Impact Statement* (EIS) is not required.

Declaration

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Appendix	Description	Author	Rev/Ref/Date
A	Section 10.7 Certificate	Snowy Monaro Regional Council	22 August 2022
B	Amended Architectural Plans	Kearney Architecture	26 June 2024
C	Arborist Statement	Abel Ecology	3 July 2024
D	Amended Civil Drawings	Kehoe Myers	26 June 2024

Executive Summary

The Amended Proposal

LJB Urban Planning Pty Ltd has been commissioned by Health Infrastructure to prepare an Addendum to Review of Environmental Factors (REF) approved for works within Cooma Hospital & Health Service. The approved works under the REF dated 24/04/2024 endorsed by Health Infrastructure on 19/06/2024 included:

- 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.

This addendum report considers the following amendments to the approved works under the endorsed REF :

- Removal of one (1) additional tree.
- Increase the overall height of the building by 460mm

The plans also include shortening of the dividing screens between the units to achieve NCC compliance, however such amendments are not required to form part of the addendum.

The changes are clouded on the amended architectural plans at **Appendix B** and civil drawings at **Appendix D**.

Planning Approval Pathway

The REF was prepared and approved by Health Infrastructure. This REF addendum will be submitted to Health Infrastructure. The proposed removal of one (1) additional tree and the increase of the overall height of the building does not alter the planning pathway.

All works as amended are within the Cooma Hospital & Health Service and this review has been undertaken in accordance with Division 10 of State Environmental Planning Policy (*Transport and Infrastructure*) 2021 (TISEPP).

Statutory Consultation

Given the nature of the changes proposed, further notification was not required in accordance with Clause 2.62(2)(a) of *State Environmental Planning Policy (Transport & Infrastructure) 2021* (TI SEPP). The changes do not result in any additional or modified impacts and therefore as discussed with Health Infrastructure, re-notified of the modified works was not required.

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
- Cooma-Monaro Local Environmental Plan 2013 (LEP)

It has been determined in the REF assessment below, that the amendments proposed to not change the proposed environmental impacts of the approved works. The environmental impacts of the endorsed REF were determined to

be minimal, and the proposed works as amended can be undertaken safely and will not adversely affect the nearby properties and are of a scale that is suitable for the subject site and adjoining properties.

The amended works will have no additional impact on surrounding land and will not result in any adverse impacts subject to compliance with all mitigation measures that have been recommended in the report.

Justification and Conclusion

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

The activity as amended 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 scale and setbacks of existing hospital buildings;
- It removes the existing conflict between uses on site;
- 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 Division 10 of State Environmental Planning Policy (Transport and Infrastructure) 2021.

1. Introduction

Health Infrastructure (HI) propose to amend the approved works for the construction of a two -storey key worker accommodation block containing twelve (12) self-contained one-bedroom units with shared internal and external communal space at ground level, landscaping works, including tree removal (the proposal) at the Cooma Hospital & Health Service 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.

The works to be undertaken as part of the proposal are to amend the approved works as follows:

- Removal of one (1) additional tree.
- Increase the overall height of the building by 460mm

The plans also include shortening of the dividing screens between the units to achieve NCC compliance, however such amendments are not required to form part of the addendum.

The changes are clouded on the amended architectural plans at **Appendix B** and civil drawings at **Appendix D**.

This Addendum Review of Environmental Factors (REF) has been prepared by LJB Urban Planning on behalf of HI to determine any changes to the environmental impacts as identified within the REF endorsed by HI on 19/06/24. 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 assessment contained within the Addendum REF has been prepared having regard to:

- whether the amended 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 5.1 of the EP&A Act; and
- the potential for the amended 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 Addendum REF helps to fulfil the requirements of section 5.5 of the EP&A Act, which requires that HI examine, and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the proposed activity.

2. Proposed Amended Activity

2.1 Proposal Overview

The additional works to be undertaken as part of the proposal are to amend the approved works as follows:

- Removal of one (1) additional tree.
- Increase the overall height of the building by 460mm

The plans also include shortening of the dividing screens between the units to achieve NCC compliance, however such amendments are not required to form part of the addendum.

The changes are clouded on the amended architectural plans at **Appendix B** and civil drawings at **Appendix D**.

The following site plans in **Figure 1** shows the additional tree that is proposed to be removed under this Addendum:

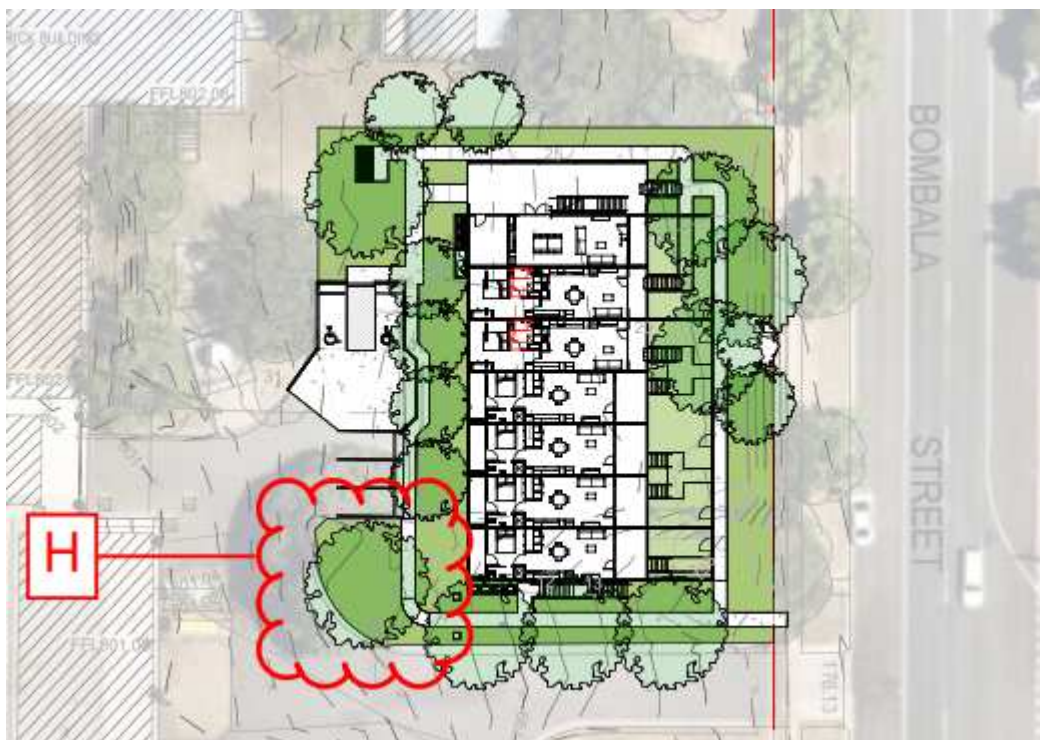


Figure 1 – Amended site plan under REF

As shown above, this Addendum seeks to remove one (1) additional tree, Tree 1001. This will result in a total of thirteen (13) trees being removed to facilitate the works. Tree 1001 is to be removed for the following reasons:

- The roots of the tree are causing damage to the stormwater drainage system
- The roots of the tree are causing damage and likely to further impact the driveway into the site and the kerb and gutter.
- During construction, the size and location of the tree will impact access to the site via crane. This will require significant pruning to the tree.

In support of the removal of Tree 1001, Abel Ecology has provided an updated arborist assessment dated 3 July 2024. The arborist statement is found at Appendix C. The report supports the removal of Tree 1001

In addition, this Addendum seeks to raise the overall height of the buildings by 460mm. This is being done by increasing the finished floor level from RL 799.460 to RL 799.920.

The reason for the amendment is for a number of reasons. The soil excavation required to facilitate the approved design places a significant cost on the project and requires additional remediation. Reducing the excavation also assists with the remediation strategy to cap and contain should any further unexpected finds be located.

The accommodation block will be manufactured off site but once installed, on the piers and slab, will have a height as amended of 9.16m.

The height of the structure itself does not change, the overall height changes by the lifting of the ground level. This is demonstrated below:

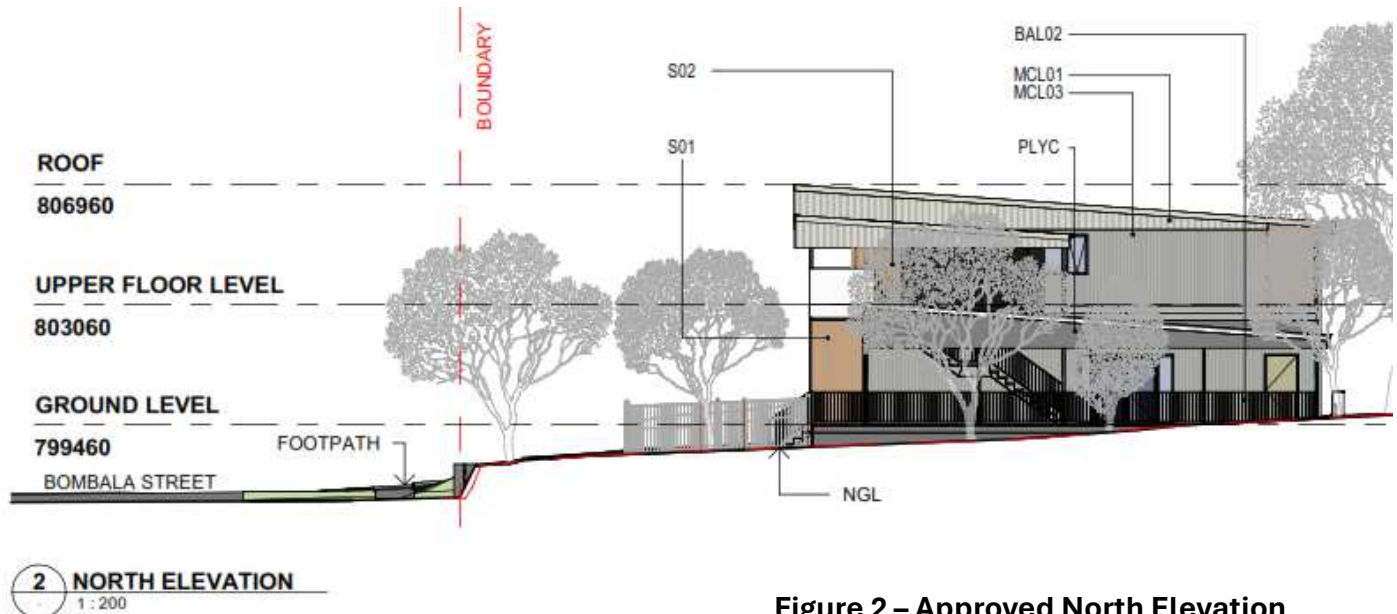


Figure 2 – Approved North Elevation

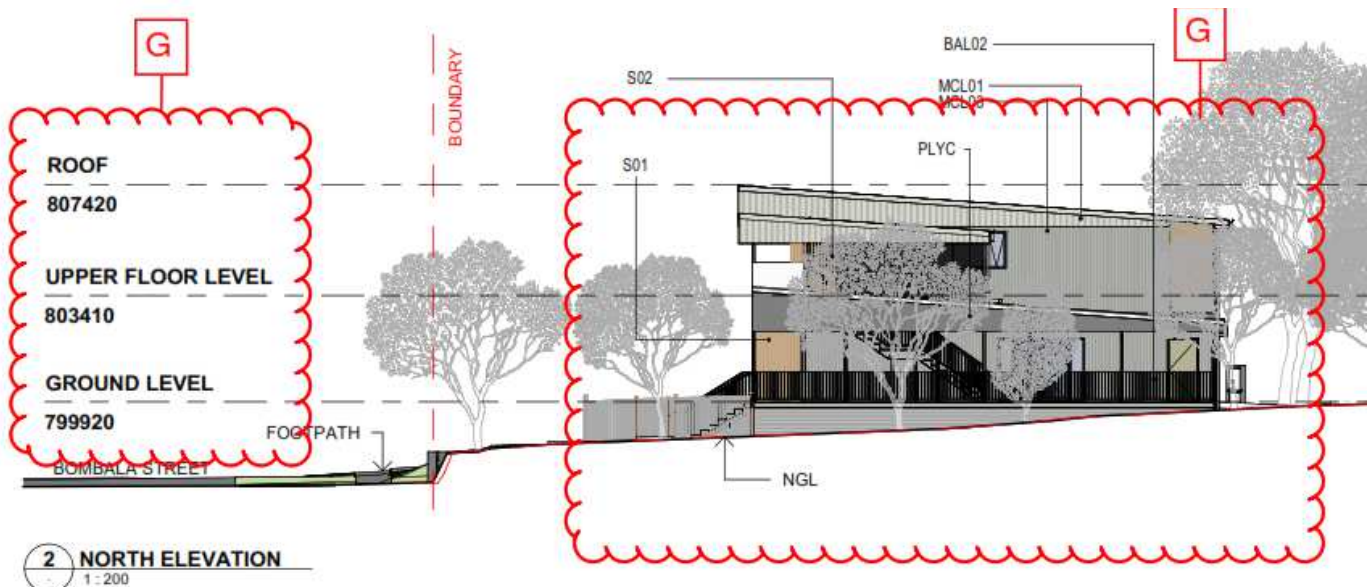


Figure 3 – Amended North Elevation



Figure 4 – Approved East Elevation

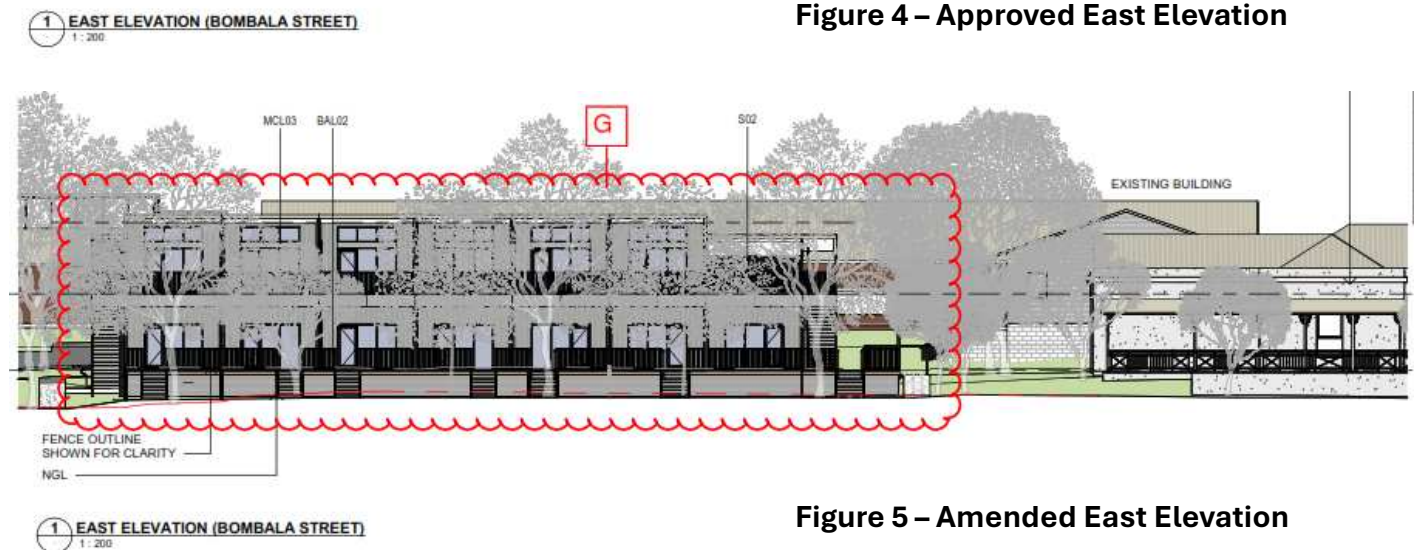


Figure 5 – Amended East Elevation

The change in the overall height needs to consider whether this impacts the relationship with the heritage item. The overall height of the new building as amended will be higher than the heritage item. However there are key elements that ensure the relationship is appropriate and maintains a sympathetic transition including:

- Retains the separation of 10.66 metres between the new building and the heritage listed building
- The building remains two storeys in height, stepping down at the northern end to create an improved transition with the adjoining heritage listed building.
- Retention of 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.
- The unobstructed site lines to the heritage item are not impact by the change in levels.

Notwithstanding the change in height, the key worker accommodation 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.

3. Statutory Framework

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 out the development, in accordance with the EPI, on land to which the provision applies. However, an environmental assessment of the development is required under Part 5 of the Act.

State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of TI SEPP outlines the approval requirements for health service facilities. A “hospital” is defined as a health service facility under this division.

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

Therefore, the proposal was 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. The amended proposal does not alter this planning approval pathway.

The amended proposal does not trigger any additional aspects of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

4. Consultation

The REF was notified to Snowy Monaro Council and occupiers of adjoining land. No response was received from Council, one submission was received from a member of the public. In addition, as the land is flood liable, the SES was notified. Matters raised in the submissions were addressed in the REF assessment. The amendments sought under this Addendum do not affect the consideration of the matters raised. Matters relating to the need for an additional tree to be removed has been considered and justified in this assessment.

Given the nature of the changes proposed, further notification of the proposed amendments was not required in accordance with Clause 2.62(2)(a) of *State Environmental Planning Policy (Transport & Infrastructure) 2021* (TI SEPP). The changes do not result in any unreasonable additional impacts and therefore as discussed with Health Infrastructure, re-notified of the modified works was not required.

5. Environmental Impact Assessment

5.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

The relevant assessment considerations under section 171 (1) of the EP&A Regulation 2021 are provided below. A comparison of the impacts of the proposal and the amended proposal have been provided.

Table 1: Summary of Environmental Factors Reviewed in Relation to the Activity

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
a) any environmental impact on a community	The activity will not adversely impact on the community. There are no significant ecological communities impacted by the activity. The proposed activity will provide improved services to the community	-ve		
Does the proposal have any natural or man-made impact on the Health Service Facility, or the broader residential or business community?		Nil	✓	✓
		+ve		
(b) transformation of a locality	Given the nature of the proposed works, they will not result in the transformation of the locality.	-ve		
Prompt only: Does the proposal significantly change the nature of the locality?	Overall, the works are appropriate.	Nil		
		+ve	✓	✓
(c) any environmental impact on the ecosystem of the locality	No impact. The site is located a significant distance from the wetlands and river systems.	-ve		
		Nil	✓	✓
	As amended thirteen (13) trees will be removed to facilitate the works. However, the trees are all exotic and does not form part of any EECs. Replacement planting will compensate for the loss.	+ve		
d) any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality.	The proposed works will not transform the Bombala Street frontage of the site and as amended 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 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 will result in an acceptable design outcome for the site to service the needs of the locality.	-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.	There will be no likely adverse impact.	-ve		
		Nil	✓	✓
		+ve		
		-ve		

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(f) Any impact on the habitat of protected fauna (within the meaning of the National Parks and Wildlife Act 1974)	No impact.	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	No impact.	-ve		
		Nil	✓	✓
		+ve		
(h) Any long term impacts on the environment	The activity will not have any long-term effects. All works will result in positive long-term changes for the wider community.	-ve		
		Nil		
		+ve	✓	✓
(i) Any degradation of the quality of the environment	The proposed works will include tree removal 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 as amended there will be the loss of thirteen (13) trees, the works will seek to improve the landscaping within the site.	-ve		
		Nil		
		+ve	✓	✓
(j) Any risk of safety of the environment	The amended works will reduce the extent of remediation and allow for the cap and contain strategy if unexpected finds are present.	-ve		
		Nil	✓	
		+ve		✓
(k) Any reduction in the range of beneficial uses of the environment	The proposed development will provide much improved and needed key worker accommodation, there will be no reduction in uses as this part of the site is vacant. Therefore, the provision of improved accommodation will remain beneficial and will continue to service the local community.	-ve		
		Nil		
		+ve	✓	✓
(l) Any pollution of the environment	Subject to the mitigation measures, there will be no unreasonable impact.	-ve		
		Nil	✓	✓
		+ve		
(m) Any environmental problems associated with the disposal of waste	There will be no likely adverse impact. The amended works will reduce the extent of remediation and allow for the cap and contain strategy if unexpected finds are present.	-ve		
		Nil	✓	✓
		+ve		
(n) Any increased demanded on resources (natural or otherwise) that are, or are likely to become, in short supply	There will be a minor increase in resources to accommodate the accommodation, however there is sufficient capacity available	-ve		
		Nil	✓	✓
		+ve		

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(o) Any cumulative environmental effects with other existing or likely future activities.	There will be no adverse cumulative environmental effect.	-ve		
		Nil	✓	✓
		+ve		
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions.	No known impacts	-ve		
		Nil	✓	✓
		+ve		
q) applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1,	The activity is not contrary to any local, regional or district plans.	-ve		
		Nil	✓	✓
		+ve		
r) Any other relevant environmental factors	There are no other relevant environmental factors	-ve		
		Nil	✓	✓
		+ve		

5.2 Summary of Impacts

Any likely impacts relating to the amended proposal from those presented for the proposed activity (within the REF) have been considered and are confirmed in Table 1. All issues relating to the amended proposal are largely minor and will not cause significant impact as a result of the proposed activity.

Table 2: Summary of Impacts relating to the activity

Issue	Discussion
Additional tree removal	<p>Tree 1001 is to be removed, resulting in a total of thirteen (13) trees being removed to facilitate the works. The tree needs to be removed for the following reasons:</p> <ul style="list-style-type: none"> The roots of the tree are causing damage to the stormwater drainage system The roots of the tree are causing damage and likely to further impact the driveway into the site and the kerb and gutter. During construction, the size and location of the tree will impact access to the site via crane. This will require significant pruning to the tree <p>The removal is supported by the site arborist. The tree removal is required to facilitate the provision of key worker accommodation on this site.</p>
Increase in overall height	<p>The height is increased by raising the ground floor level to reduce the extent of soil excavation. The potential impacts are more visual impacts and relationship with the heritage item. Notwithstanding the increase in height, the impacts on the heritage item are minimised due to the following:</p> <ul style="list-style-type: none"> Retains the separation of 10.66 metres between the new building and the heritage listed building The building remains two storeys in height, stepping down at the northern end to create an improved transition with the adjoining heritage listed building. Retention of 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. The unobstructed site lines to the heritage item are not impact by the change in levels.

6. Summary of Mitigation Measure

The endorsed mitigation measures are attached at **Appendix Q** of the endorsed REF.

Additional or changes to the mitigation measures, presented in the REF for the proposal, in relation to the amended proposal are provided in Table 3.

Table 3: Altered mitigation measures

No

Mitigation measures

1

The proposal must be carried out generally in accordance with the Review of Environmental Factors dated 24 April 2024 and prepared by LJB Urban Planning PTY LTD on behalf of NSW Health Infrastructure (including accompanying Appendices A – R and Addendum Appendices A – D) generally in accordance with the following plans/documentation as modified below and by any of the under-mentioned measures:

Drawing Title	Drawing Ref	Revision	Date	Prepared by
Title Page	A100	C	16.02.24	Kearney Architecture
Location Plan	A001	G H	16.03.24 26.06.24	Kearney Architecture
Site Survey	A002	B	16.02.24	Kearney Architecture
Demolition Plan	A003	E D	16.02.24 26.06.24	Kearney Architecture
Site Plan	A004	J K	04.04.24 26.06.24	Kearney Architecture
Site Plan Level 1	A005	H J	04.04.24 26.06.24	Kearney Architecture
Site Roof Plan	A008	B C	04.04.24 26.06.24	Kearney Architecture
Site Elevations – Sheet 1	A011	F G	04.04.24 26.06.24	Kearney Architecture
Site Elevations – Sheet 2	A012	F G	04.04.24 26.06.24	Kearney Architecture
Sections – Sheet 1	A013	E D	04.04.24 26.06.24	Kearney Architecture
Sections – Sheet 2	A014	E D	04.04.24 26.06.24	Kearney Architecture
Sections – Sheet 3	A015	E D	04.04.24 26.06.24	Kearney Architecture
Landscape Cover Sheet	000	B	23.04.24	Andrew Gold Landscape Architecture
Landscape Notes	001	B	23.04.24	Andrew Gold Landscape Architecture
Planting Schedule	002	B	23.04.24	Andrew Gold Landscape Architecture
Surfaces & Tree Removal	100	B	23.04.24	Andrew Gold Landscape Architecture
Planting Plan	200	B	23.04.24	Andrew Gold Landscape Architecture
Landscape Details	300	B	23.04.24	Andrew Gold Landscape Architecture

- 9.1** The activity shall adopt the recommendations of the Arboricultural Impact Assessment Report for Cooma Hospital, 2A Bent Street, Cooma, NSW, 2630 Lot 2, DP 1161366 – Proposed new staff accommodation (prepared by Abel Ecology, dated 15/02/2023 & addendum prepared by Abel Ecology, dated 3 July 2024).

- 9.5 The small Cupressus trees referred to as T1001, T1007, T1008, T1009 and T1010 in the Arborist Report prepared by Abel Ecology dated 15/02/23 are approved for removal. However, these trees have been identified as being able to be transplanted within the site, as stated in the Arborist Report prepared by Abel Ecology dated 15/02/2023. If transplantation is undertaken, a suitably qualified arborist shall prepare a report to ensure that transplantation is managed correctly
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7. Justification and Conclusion

The amended proposal which provides for changes to the tree removal and height of the key worker accommodation building at Cooma Hospital & Health Service is subject to assessment under Part 5 of the EP&A Act. A REF for the construction of key worker accommodation was endorsed by HI on 19/06/2024. This Addendum 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 amended proposed activity.

As discussed in detail in this report, the amended 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.

The environmental impact of the removal of an additional tree and increase in the overall height of the building will not result in any significant or long term impacts. The modifications do not change the impacts identified in the approved REF or the mitigation measures.

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

- The additional tree removal is required to minimise damage to services and to facilitate construction. New landscaping proposed will offset the tree removal
- The change to the overall height of the building retains the key elements of the original approval that minimised the impact on the heritage item.
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has considered all potential impacts (changed from those identified within the REF) and has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the amended proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5.1 of the EP&A Act.

On this basis, it is recommended that HI determine the amended 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.