

HEALTH INFRASTRUCTURE

Review of Environmental Factors

Re-development of the Blayney Multipurpose Service Facility

12 June 2024

Version Number 2.1



HI Planning Document Control

Version	Date	Author	Description	Reviewed by	Approved by
1	06/10/2023	JK	DRAFT	AW	AW
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Declaration

This Review of Environmental Factors (REF) has been prepared for NSW Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from the proposed re-development of the Blayney Multipurpose Service at No. 3 Osman Street, Blayney.

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* (TISEPP).

This REF provides a true and fair review of the activity in relation to its likely impact on the environment. It addresses to the fullest extent possible, all the factors listed in section 171(2) of the EP&A Regulation 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	
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Document Management, Tracking and Revision History

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Appendices

Appendix	Description	Author	Rev/Ref/Date
1	Section 10.7 Certificate	Blayney Shire Council	120/2022 / 23.05.2024
2	Architectural Plans:	NBRS	-

Appendix	Description	Author	Rev/Ref/Date
	Cover		Issue 8 / 03.08.2023
	Drawing List		Issue 4 / 03.08.2023
	Abbreviations and Notes		Issue 2 / 03.08.2023
	Site Plan - Stage 1		Issue 6 / 03.08.2023
	Site Plan - Stage 2		Issue 6 / 03.08.2023
	Site Plan - Stage 3		Issue 6 / 03.08.2023
	Demolition Plan – Stage 1		Issue 5 / 03.08.2023
	Demolition Plan – Stage 2		Issue 5 / 03.08.2023
	Demolition Plan – Stage 3		Issue 5 / 03.08.2023
	Fire and Smoke Compartment Plan		Issue 7 / 03.08.2023
	Overall Floor Plan		Issue 8 / 03.08.2023
	Overall Roof Plan		Issue 8 / 03.08.2023
	General Arrangement Plan – Part 1 of 3		Issue 7 / 31.07.2023
	General Arrangement Plan – Part 2 of 3		Issue 7 / 31.07.2023
	General Arrangement Plan – Part 3 of 3		Issue 7 / 31.07.2023
	Site Elevations		Issue 8 / 03.08.2023
	External Elevations – RAC IPU		Issue 8 / 03.08.2023
	External Elevations - H1		Issue 4 / 03.08.2023
	RAC and IPU Sections		Issue 7 / 03.08.2023
	Main Building Sections		Issue 6 / 03.08.2023
	RAC – Façade Sections – Sheet 1		Issue 2 / 03.08.2023
	RAC – Façade Sections – Sheet 2		Issue 1 / 03.08.2023
	H1 – Façade Sections – Sheet 1		Issue 2 / 03.08.2023
3	REF Report and Design Statement	NBRS & Partners	Rev 2 / 24.08.2023
4	Landscape Plans	NBRS	Issue 1 / 16.11.2023
5	Civil Design Report	Jacobs	Rev 4 / 29.05.2024
6	Connecting with Country Report	NBRS Architecture	Rev B / 07.08.2023
7	ESD DGN 058 Performance Specification (Sustainability)	LCI Consultants	Rev 01 / 18.08.2023
8	BCA and DDA Assessment Report	Blackett, Maguire and Goldsmith	Rev 5 / 19.09.2023
9	Design Development Report	NBRS & Partners	Rev 0.2 / 24.08.2023
10	Arboricultural Impact Assessment	Creative Planning Solutions	Rev A / 02.03.2023
11	Engineering Concept Design Report	Jacobs Group	Rev 3 / 31.10.2022
12	Site Survey	Premise	Rev C / 08.05.2023
13	Remediation Action Plan	JK Environments	01.08.2023
14	Preliminary Construction Management Plan	NSW Health Infrastructure	Rev 04 / 14.09.2023
15	EPBC Act Protected Matters Report	-	09.02.2023
16	Ecological Assessment	Firebird ecoSultants	Ver 1 / Feb 2023
17	Aboriginal Due Diligence Assessment	Biosis	Ver 2 / 15.11.2022
18	Statement of Heritage Impact	Biosis	Ver 03 / 22.11.2023
19	Notification Responses	Blayney Shire Council, NSW SES	-
20	Waste Management Plan – Blayney	Western NSW Local Health District	Revised 08.08.2022

Appendix	Description	Author	Rev/Ref/Date
21	REF Application Communications and Engagement Report	Health Infrastructure	11.01.2024
22	Traffic and Parking Design Development Report	SCT Consulting	Ver 2.0 / 14.08.2023
23	Noise and Vibration Impact Assessment	Acoustic Logic	Rev 3 / 12.09.2023
24	Geotechnical Investigation	JK Environments	02.02.2023
25	Detailed (Stage 2) Site Investigation	JK Environments	23.06.2023
26	Flooding – Technical Memorandum	GHD	14.08.2023
27	Bushfire Threat Assessment	Firebird ecoSultants	07.11.2023
28	Hazardous Materials Audit	Envirowest Consulting	Rev 0 / 14.11.2022
29	Desktop Preliminary Site Investigation	JK Environments	30.11.2022
30	Preliminary (Stage 1) Site Investigation	JK Environments	22.12.2022
31	Asbestos Management Plan	Envirowest Consulting	Rev 0 / 14.11.2022
32	Social Impact Assessment	Urbis	Final / 27/09/2023
33	Recommended Mitigation Measures	WPP	-

Abbreviations

Abbreviation	Description
AEC	Area of Environmental Concern
AHD	Australian Height Datum
AHIP	Aboriginal Heritage Impact Permit
AHIMs	Aboriginal Heritage Information Management System BC Regulation
AMG	Australian Map Grid
BC Act 2016	Biodiversity Conservation Act 2016
BC Act 2017	Biodiversity Conservation Act 2017
BC Regulation	Biodiversity Conservation Regulation 2017
BAM	Biodiversity Assessment Method
CA	Certifying Authority
CE	Chief Executive
CM Act	Coastal Management Act 2016
CMP	Construction Management Plan
CWC	Connecting with Country
CRA	Conservation Risk Assessment
DPC	Department of Premier and Cabinet
DPHI	Department of Planning, Heritage and Infrastructure
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EES	Environment, Energy and Science
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act (Cwth)	Environment Protection and Biodiversity Conservation Act 1999
EPI	Environmental Planning Instrument
EPL	Environment Protection License
FM Act	Fisheries Management Act 1994
Ha	Hectares
HHIMS	Historic Heritage Information Management System
HI	Health Infrastructure
LEP	Local Environmental Plan
LGA	Local Government Area
MPS	Multipurpose Service
MNES	Matters of National Environmental Significance

Abbreviation	Description
NPW Act	National Parks and Wildlife Act 1974
NPW Regulation	National Parks and Wildlife Regulation 2009
NPWS	National Parks and Wildlife Service (part of EES)
NT Act (Cth)	Commonwealth Native Title Act 1993
OEH	(Former) Office of Environment and Heritage
PCMP	Preliminary Construction Management Plan
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
POEO Act	Protection of the Environment Operations Act 1997
Proponent	NSW Health Infrastructure
REF	Review of Environmental Factors
RF Act	Rural Fires Act 1997
RFS	Rural Fire Service
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
SEPP	State Environmental Planning Policy
SIS	Species Impact Statement
TISEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	Water Management Act 2000

Executive Summary

The Proposal

The proposal relates to the demolition of the existing Blayney Multipurpose Service (MPS) facility at No. 3 Osman Street, Blayney, and the development of a new MPS facility on the same site. The Activity is intended to provide an improved health services facility to meet the current and future needs of the residents of Blayney and its surrounds. Demolition and construction of the new facility would take place over 3 discrete stages, to allow for the continued occupation and operation of the existing site services until completion of the new facility. The construction phase is anticipated to occur over approximately 21 months.

The proposed re-developed MPS would comprise a single-storey main building with multiple wings complemented by several small outbuildings; a new internal road and pedestrian network; carparking; a new heavy-vehicle site entrance from Queen Street; and extensive site landscaping. The existing services and uses of the MPS facility would be maintained (e.g. hospital, residential aged care, HealthOne facilities), with a slight increase in the facility's capacity.

The Activity would include tree removal, earthworks and contamination remediation works. Much of the existing infrastructure (e.g. water, electricity) would be upgraded and / or replaced to meet current standards, with some services to the site (e.g. gas) ultimately terminated.

Need for the Proposal

Multipurpose Services are local facilities that combine a range of health and aged care services. Each service is tailored to meet the community's unique clinical needs into the future.

The NSW Government is undertaking a \$297 million Multipurpose Service Program aimed at improving access to health and aged care services across smaller rural and remote communities. Traditional hospital structures and models of care have changed to reflect evolving health needs in regional and remote environments. There is now a greater emphasis on primary health care, including health improvement and prevention programs, delivered in an integrated way. In small communities, more flexible service models are being delivered as part of a more client-focused approach, responsive to community needs.

A Clinical Services Plan has been developed for Blayney, which outlines the future directions for the Blayney MPS to help meet the needs of the community into the future. Design development, based on this Plan, has led to the current proposal for the major re-development of the Blayney MPS site.

Proposal Objectives

The primary objective of the proposal is to provide improved health services for Blayney and surrounds. Secondary objectives for the development of the site include:

- Minimising visual, noise and vibration impacts on adjoining properties;
- Minimising traffic and parking impacts;
- Minimising impacts on Aboriginal and Non-Aboriginal heritage;
- Minimising soil, stormwater, ecology, social and air quality impacts;
- Mitigating potential impacts from contamination and bushfire; and
- Maintaining adequate services.

Options Considered

As part of the initial design process, 11 sites within the Blayney township were identified as having potential to accommodate a re-developed / new MPS Facility, including the existing site. These sites included the existing Blayney MPS site and potential sites identified by Blayney Council. These sites were assessed by the Project Team and executive user groups against various criteria including the site area, cost, relevant planning controls, ownership, and risk profile.

A detailed assessment and scoring process resulted in the existing MPS site being selected as most appropriate for the re-development.

Site Details

The proposed Activity is to be located on the site of the existing Blayney MPS facility at No. 3 Osman Street, Blayney. The land is legally described as Lot 2 in DP 1097082.

Planning Approval Pathway

The proposal involves the demolition of an existing 'health services facility' and the erection of a new 'health services facility' by NSW Health Infrastructure (a public authority) within the boundaries of the existing Blayney MPS. Accordingly, pursuant to Sections 2.61(1)(a) and 2.61(1)(c) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021*, the proposed works are classified as development which may be carried out without consent.

Therefore, the proposal is considered an 'activity' for the purposes of Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and is subject to an environmental assessment. For the purposes of this proposal, NSW Health Infrastructure (HI) is the proponent and the determining authority. The required environmental assessment is in the form of a Review of Environmental Factors (REF), which 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 Environmental Impact Statement 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 proposal to significantly impact Matters of National Environmental Significance 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 Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Statutory Consultation

The TISEPP outlines requirements for statutory consultation in certain circumstances. In the case of the proposed Activity, written notice of the intention to carry out the development was provided to Blayney Council, the State Emergency Service and adjoining landowners. Stakeholders were provided with 21 days in which to provide a response to the notification. Responses received from stakeholders were considered and changes made to the design of the Activity, as appropriate.

In addition, non-statutory consultation was undertaken with a wide range of community and government stakeholders throughout the design process.

Environmental Impacts

This REF provides an assessment of the proposed re-development of the Blayney MPS, including demolition, construction and operational impacts. It considers to the fullest extent possible all matters affecting or likely to affect the environment by reason of the proposed development, as required pursuant to the EP&A Act. The REF also sets out the commitments made by HI to manage and minimise potential impacts arising from the development. The REF finds an Environmental Impact Statement is not required and this REF is an adequate level of impact assessment.

The proposed re-development will predominantly result in environmental impacts that are either negligible or low. The most notable potential environmental impacts relate to short-term noise and visual impacts associated with the construction phase.

The Activity will provide improved health services for the Blayney region. On balance, the proposal is anticipated to provide a net positive impact for the local community.

Justification and Conclusion

Based on the environmental assessment undertaken as part of this REF, it has been determined that the proposal will not result in any significant or long-term detrimental impacts. 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 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 and Homes under Part 5.1 of the EP&A Act. The proposed development will not have any effect on Matters of National Environmental Significance and approval of the Activity under the Commonwealth EPBC Act is not required.

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.

1. Introduction

NSW Health Infrastructure (HI) proposes the re-development of the Blayney Multipurpose Service facility (the proposal) at No. 3 Osman Street, Blayney (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 WPP Pty Ltd on behalf of HI to determine the environmental impacts of the proposed re-development at Blayney. 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 section 171(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

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

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

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

1.1 Proposal Need and Alternatives

Most of the existing structures and facilities at the Blayney Multipurpose Service (MPS) were constructed in the late 1980s. A recent review identified a number of issues within the current facility, including with regard to functional suitability, operational efficiency and clinical compliance. The majority of the existing built development on the site was found to be aged, undersized and showing signs of wear and tear, and did not align with contemporary standards.

NSW Health Infrastructure determined to re-develop the Blayney MPS in line with the current Clinical Services Plan, to meet current and projected demand for services.

As part of the initial design process, 11 sites within the Blayney township were identified as having potential to accommodate a re-developed / new MPS Facility, including the existing site. These sites included the existing Blayney MPS site and potential sites identified by Blayney Council. These sites were assessed by the Project Team and executive user groups against various criteria including the site area, cost, relevant planning controls, ownership, and risk profile.

A detailed assessment and scoring process resulted in the existing MPS site being selected as most appropriate for the re-development.

2. Site Analysis and Description

2.1 The Site and Locality

Blayney is situated in the Central Tablelands of New South Wales, approximately 3.5 hours driving time west from Sydney and 25 minutes from Bathurst. The township of Blayney sits within the Blayney Local Government Area (LGA). The traditional land-owners of the Central-Western New South Wales area, including Orange, Cadia and Blayney, are the Wiradjuri people. The Orange Local Aboriginal Land Council administers relevant matters within the Blayney area.

The site is located at No. 3 Osman Street, Blayney, and is legally described as Lot 2 in DP 1097082. It is situated in the southern quadrant of the Blayney township, on the corner of Osman Street and Martha Street, approximately two-minutes driving time from the central business district. Martha Street forms part of the Mid Western Highway (A41) and provides access to Bathurst to the north-east and Cowra to the south-west. The Mid Western Highway is a classified highway under the *Roads Act 1993*.

The site comprises a single allotment with an area of approximately 1.37 hectares. It is owned by the Western Local Area Health District and accommodates the Blayney MPS facility.

The Blayney MPS is a rural health facility which provides health care services to the township of Blayney and surrounding villages and rural areas. The 29-bed facility includes residential aged care beds, hospital care beds, 24-hour nurse-led emergency services, and ambulatory care services. The MPS is co-located with a HealthOne facility which provides consulting suites for a range of services including general practitioners, pathology, dental and family health.

Vehicular access to the site is via two driveways connecting to Osman Street (one two-way, one exit-only), with an additional dedicated connection to the Blayney Ambulance Station adjacent to the site's western boundary. Built development within the site is described in **Section 2.1.1** of this REF. Outside of built development areas, the site accommodates areas of lawn, mature trees and gardens scattered around the site. Approximately 54 trees are located within the site, predominantly adjacent to site boundaries, with most comprising exotic planted specimens.

The topography of the site is gently undulating, sloping towards the north and east at about 3 degrees. The land sits approximately 2m lower than the street level along the Martha Street frontage, with a batter slope (varying between 10 degrees and 15 degrees) extending downwards into the site from the street. The slope is vegetated with trees and shrubs so views into the site from this frontage are obscured. The site sits approximately level with Osman Street. Several pedestrian footpaths lead into the street from this frontage, as well as the vehicular driveways.

The site is zoned R1 General Residential pursuant to the *Blayney Local Environmental Plan 2012* (the LEP). Whilst the site does not contain an item of environmental heritage, it is in proximity to several heritage items, including items on the opposite side of Martha Street. The site is not identified as bushfire prone, or mapped as 'flood prone land'. There are no other mapped environmental constraints, such as acid sulfate soils, drinking water catchment or biodiversity.

The site has access to all required utilities and services, such as sewerage, electricity, gas, telecommunications and stormwater drainage facilities.

A Site Locality Plan is provided at **Figure 1** and an aerial view of the site is provided at **Figure 2**.

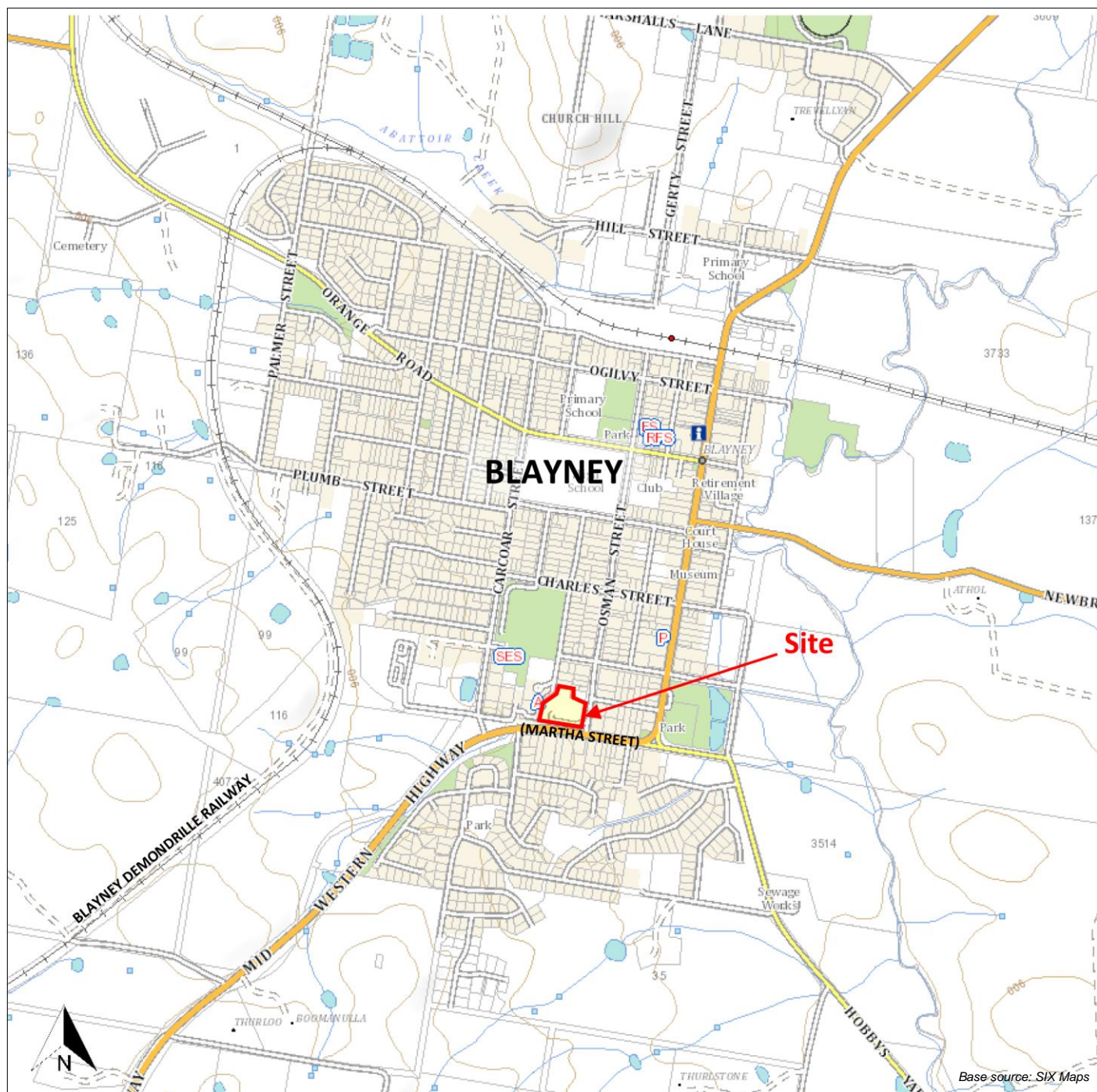


Figure 1: Site Locality Plan



Figure 2: Aerial view of site

2.1.1 Existing Development

The Blayney MPS currently operates from the site. Multipurpose Services (MPS) facilitate a sustainable model of integrated health service delivery which provides a combination of hospital, residential aged care, community health and other services (e.g. GPs, Ambulance Service and Community Care) in the one location. They have enabled smaller rural and remote communities to retain basic services and expand those that are relevant to local communities.

The existing Blayney MPS is a 29-bed rural health facility that includes a range of health services including inpatient care (including respite and end of life); aged care places; 24 hour nurse-led emergency care; and visiting specialist services (e.g. radiography, physiotherapy etc). The co-located HealthOne Service facility (accommodating consulting suites for services such as GPs, pathology services and community nursing) operates separately but shares some efficiencies with the MPS facility.

Physically, existing development on the site comprises a single main building with multiple wings, supported by several outbuildings, roads and parking areas, as indicated in **Figure 3** below. Key elements include the following:

- The main MPS entrance is located in the southern wing, fronting Martha Street;
- The Emergency Department access is on the eastern side of the southern wing, fronting Osman Street;
- Two residential aged care wings are in the northern and north-western wings;
- The HealthOne facility is located in the eastern wing, near Osman Street. It has a separate entrance to the hospital;
- A hospital services building (including mortuary and plant spaces) is located south of the Health-One facility;
- Several staff garages and carports are located near the western boundary of the site;

- A visitor’s carpark (19 spaces) is located near the Osman Street entrance;
- A staff carpark (18 spaces) is located west of the main hospital building;
- Various roads provide access around the southern and central portion of the site, and numerous pedestrian pathways provide access throughout the grounds;
- A dedicated driveway provides ambulance access from the adjacent Ambulance Station, west of the site.

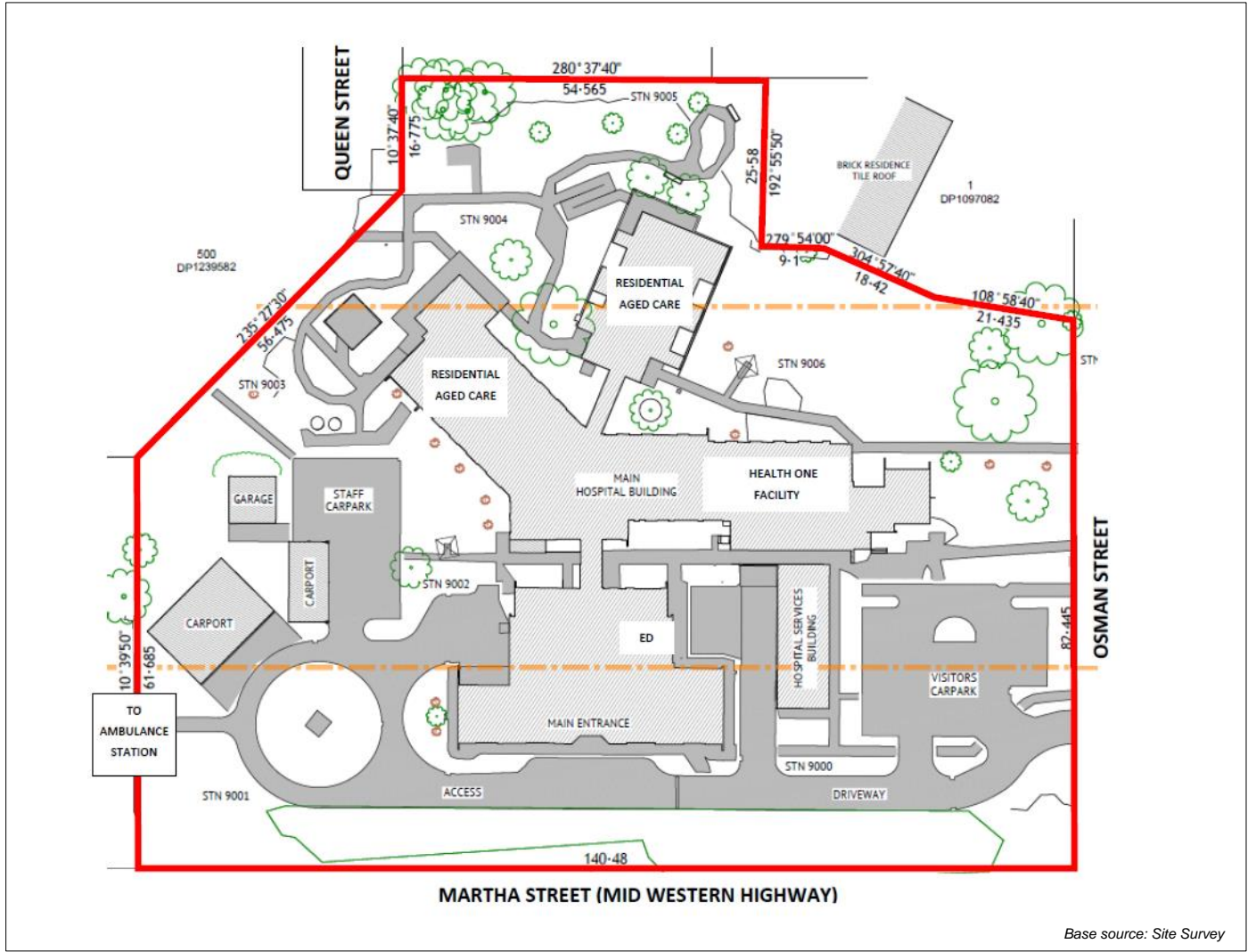


Figure 3: Existing development on the site

2.1.2 Site Considerations and Constraints

Section 10.7 Planning Certificate No.120/2022 dated 23/05/2024 identifies that the site is located within the R1 zone under the *Blayney Local Environmental Plan 2012*, and is provided at **Appendix 1**.

Table 1: Section 10.7 Planning Certificate

Affectation	Yes	No
Critical habitat		✓
Conservation area		✓
Item of environmental heritage		✓

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

2.2 Surrounding Development

The site is located within an established residential area, with surrounding land predominantly also zoned R1 General Residential.

Land on the opposite (southern) side of Martha Street accommodates predominantly single-storey, older-style, low-density residential dwelling houses. Land to the north and east along Osman Street accommodates similar development.

The Blayney Ambulance Station is located directly adjacent to the site, to the west. Ambulances can gain direct access to the site from the Ambulance Station via a dedicated vehicular driveway. The Lee Roshana Aged Care Facility, accommodating up to 26 residents, is located adjacent to the site's north-western boundary. Two gated footpaths provide direct connections between the sites. The central business district of Blayney is located approximately 2 minutes driving time north, also along the Mid Western Highway.

Existing gardens and street trees in the vicinity of the site (many of them exotic), along with deep, landscaped street setbacks to homes assist in establishing a 'leafy', suburban character to the area.

3. Proposed Activity

3.1 Proposal Overview

The proposal relates to the demolition of the existing Blayney MPS facility, and the development of a new MPS facility on the same site to meet the current and future needs of the residents of Blayney and its surrounds.

Demolition and construction of the new facility would take place over 3 discrete stages, to allow for the continued occupation and operation of the existing site services until completion of the new facility.

The new facility would include the following key elements:

- A new single-storey main MPS building including the key features outlined in **Table 2** below;
- Reconfigured vehicle access from Osman Street, and a new heavy-vehicle access from Queen Street. Ambulance access from the adjacent Ambulance Station would be maintained;
- New internal road networks, including hardstand areas, loading docks and drop-off / pick-up locations;
- Retention of an existing carpark and creation of new carparking areas (with a net increase of 7 parking spaces);
- Extensive landscaping of the grounds, including establishment of dedicated courtyards and pedestrian path networks; and
- Establishment of support facilities and services, including switchboard / generator rooms, a workshop and garden sheds.

The Activity would include tree removal, earthworks and contamination remediation works. Much of the existing infrastructure (e.g. water, electricity) would be upgraded and / or replaced to meet current standards, with some services to the site (e.g. gas) ultimately terminated.

A set of *Architectural Plans* and a *REF Report and Design Statement* is provided at **Appendices 2** and **3** respectively. Landscaping Plans are provided at **Appendix 4**. A civil works report and drawing package is provided at **Appendix 5**.

Table 2: Key features of proposed MPS facility, compared to existing

Feature	Existing	Proposed
High-care residential aged care places, including patients with dementia, and respite care for low and high care residents	20	20
Inpatient beds (low level acute care), including palliative and respite care, bariatric and negative flow	5	8
Transitional aged care places (within IPU)	4	4
Emergency Department treatment bays	2	2
Emergency Department ambulatory care treatment bays	2	4
HeathOne:		
Consulting rooms	6	9
Dental room	1	1
Pathology collection	1	1
Treatment room (GP Practice Nurse)	1	1
Interview room – mental health	0	1

3.1.1 Design Approach

Placemaking and Design

In 2017, the NSW Government Architect released *Better Placed*, an integrated design guide *about enhancing the design quality of our built environment, raising expectations, and raising standards, about working better and creating better environments* (p11). *Better Placed* provides 7 objectives for good design, which HI has adopted in order to develop the best built outcomes for its facilities. The design of the re-developed Blayney MPS facility has been guided by these key objectives and principles, as outlined in **Table 3** below.

Further details on the design process and philosophy are provided in the *REF Report and Design Statement at Appendix 3*.

Table 3: Better Placed Assessment

Design Objectives	Design Response
Objective 1: Better fit	<p>The proposal has been designed as a direct response to the context of the site, the Country in which it is located and the constraints of existing development. The designing with Country process is well integrated throughout the design approach.</p> <p>The design is developed to ensure the staging on-site maintains the operation of the existing facility with minimal disruptions. The elements such as direct visual connection to landscape upon entry, doors to residents' bedrooms allowing them to walk outside from their rooms reference the important cultural element if the indigenous community to feel comfortable in the space. The building massing and the roof form highlight the main entry to the hospital helping with wayfinding.</p>
Objective 2: Better performance	<p>The proposal is designed to be sustainable in its construction and operation, fit for purpose in its use and durable in its construction.</p> <p>The building is designed to be 4-star Greenstar equivalent, and includes numerous sustainability initiatives. Key ESD initiatives incorporated in the project include:</p> <ul style="list-style-type: none"> • Full electrification of the site in line with Health Infrastructure's long-term electrification strategy and to reduce carbon footprint. The site currently uses LPG gas, and transitioning to 100% electrification will enable a future of carbon natural operations; • Consultation and incorporation of Indigenous Design Elements; • Onsite Renewable Energy via Rooftop Solar Photovoltaics (PV) cells; • Outdoor green spaces and access to nature; • Enhancement of ecological values through green infrastructure and planting selection; • Reduce building energy use and associated carbon emissions through energy efficiency considerations; • Rainwater tanks of up to 15,000 litres for landscape irrigation with raw water top-up; • Promote the use of low carbon transport model through the provision of EV charging; • Views to external planting for connection to nature, natural daylighting and glare control; • Design for Lighting comfort, Acoustic comfort, and Thermal comfort; • Use of materials with low off-gassing (low VOC's and Formaldehyde); and • Sustainable drainage systems considered such as biofiltration and swales. <p>The building is designed for robustness and durability. Wherever possible materials are selected with integral finishes to minimise wear and maintenance. The strategies will be considered within the project constraints such as budget, programme, site, infection control etc to ensure the appropriate and sensible outcome.</p>
Objective 3: Better for community	<p>The proposal seeks to provide an inclusive and connected environment for its users and the community. For example:</p> <ul style="list-style-type: none"> • The main building entry is designed to be welcoming and accessible; • The landscaped spaces around the building and at the entry are designed to provide places for people to either sit quietly or gather with others; • Multipurpose room close to Residential Aged Care and Inpatient Unit opening to the courtyard connecting with yarning circle provides a unique meeting space for the families of the patients; • The building is designed for equitable and dignified equitable access to all areas across Community Health, Emergency, Inpatient Unit and Residential Aged Care.

Design Objectives	Design Response
Objective 4: Better for people	<p>The proposal seeks to provide safe, comfortable and liveable spaces for all the people who use it. For example:</p> <ul style="list-style-type: none"> • The building is designed with safety in mind, ensuring clear sightlines for safety and surveillance; • Internal spaces are designed to maximise natural light and create user-friendly and rich enjoyable environments. The resident's day living areas are designed to provide access to natural light and landscape outlooks; • Gathering areas such as Lounge, Therapy Room, Activity Room and Multipurpose room allow direct access to outdoor landscape; • Most of the resident's bedrooms in Residential Aged Care have direct access to outdoor courtyard space; • Palliative Care Bedroom and the Family Lounge have a dedicated outdoor area that is accessible directly from the rooms; and • Staff areas are designed to be safe, well-lit and well ventilated.
Objective 5: Better working	<p>The proposal is designed for functionality and effectiveness to ensure its ongoing viability and utilisation. Considerable analysis and design refinement has developed a proposal that has efficient circulation, streamlined workflows, creates consolidated workspaces across hospital considering Protecting People and Property guidelines, and provides flexibility in use as suitable by the staff. Access to natural daylight for most working areas is considered to enhance the work experience.</p>
Objective 6: Better value	<p>The proposal creates value for the users and the community, setting a high standard in the design of a rural health service, creating social and well-being benefits for users and enhancing the adjacent areas of the site. The design of the building fundamentally considers and integrates responses to the needs of sustainability, social impact and economic viability.</p>
Objective 7: Better look and feel	<ul style="list-style-type: none"> • The proposed development seeks to create an environment in and around the building that contributes to the sense of place and enriches the surrounding environment; • The unique design approach of the connection with nature contributes to a rich and diverse environment enhancing the experience of the facility; • The site areas are softened and enriched with a landscape treatment that creates rich and varied environments around the new development. This landscape treatment is underpinned by the regeneration of Country and incorporates direct response to first nations engagement; • The design of the building entry makes a significant contribution visually and in terms of connecting with Country, through transparency, art, and greening of external spaces.

Connecting with Country/ Engagement

The traditional landowners of the Blayney area, including the site, are the Wiradjuri people. From the outset of the project, Aboriginal guidance and local knowledge was considered integral to the MPS design, longevity and future use. To assist the design team in providing a best practice engagement and design outcome, strategies and protocols from the *Connecting with Country Framework* (GANSW 2023) and *Australian Indigenous Design Charter* (IDC 2018) were adopted to guide engagement.

As outlined in the *Connecting with Country Report* (see **Appendix 6**), Wiradjuri community members and Knowledge Holders were invited to participate in focus group discussions during the design of the project. Sessions were held in November 2022, May 2023 and July 2023. The focus groups were presented with diagrams and architectural visualisation material, and information was provided on how the site is intended to function. Conversations were held in an open forum manner to enable in-depth discussions about the site's history, stories of personal connections to the hospital and Wiradjuri cultural knowledge.

The intent of the engagement was to learn of the stories that are significant to the community and could be explored and interpreted in the design process. At the end of each focus group, participants were asked for verbal feedback and recommendations.

The feedback from the focus groups is summarised within Section 4 of the *Connecting with Country Report*. The project design was influenced by this feedback, as detailed within the Report. Key design changes included the positioning of a yarning circle within the aged care courtyard; a focus on the use of natural materials where possible; and the inclusion of direct patient bed access to the courtyard from the palliative care room, to promote connections with the landscape.

Sustainability

The proposed re-developed MPS facility has been designed, and will be constructed to achieve equivalence to the *Health Infrastructure Design Guidance Note* (DGN) no. 058, which directly corresponds to Green Star sustainability

- Journal of Management Studies*, 36(7), 809–826.

façade glazing, feature paving and landscaping. A central glazed spine would provide visual connections from the building entrance directly through to landscaped vistas in the adjacent courtyard.

- The northern wing would accommodate the Reception, Emergency Department, Shared Services (e.g. therapy room / gym), HealthOne facility, and back-of-house support functions (including offices and staff rooms, kitchen, mortuary, storage and plant).
- Residential Aged Care residents and hospital inpatients would be housed in dedicated wings (southern and western respectively), separate from other hospital functions. The 2 wings would share a clinical support / staff base at their nexus to allow for staffing efficiencies. Each room would have visual and often physical access to the landscaped outdoors via windows or doors. Dedicated private courtyards would be provided for users of each wing.
- Vehicular access to building entrances would be concentrated in 2 zones:
- Patient, residents and staff would enter via the carparks / drop-off points at the main entrance;
- Ambulance drop-offs, funeral home pick-ups, general deliveries and waste collection would occur via the separate service delivery docks at the building's northern façade.
- Floor levels throughout the building would be similar, to assist in access throughout the facility i.e. the Residential Aged Care and Inpatient Unit wings would be at RL 874.65m AHD, whilst the HealthOne wing would be at RL 874.20m AHD.
- The proposed design *draws from the existing local architecture and utilises the colours inspired by the rural landscape* (p19, **Appendix 3**). Proposed materials include compressed fibre cement panels in various finishes, brick, glazed doors and windows, metal frames, and metal roof sheeting.
- Conceptual views of the proposed building are provided at **Figure 5**, **Figure 6** and **Figure 7** below.

In addition to the main building, several small outbuildings are proposed around the site, including a dirty workshop, garden shed, fleet / staff vehicle carport, and switchboard / generator rooms. The location of these structures is indicated on the plans at **Appendix 2**.



Figure 5: Conceptual view of proposed main entry



Figure 6: Conceptual view of proposed RAC wing



Figure 7: Southern elevation of proposed building, showing main entry and residential aged care facades

Building Code of Australia

A *BCA and DDA Assessment Report* was prepared for the Activity – see **Appendix 8**. The proposed building is required to be a Type C construction pursuant to the *Building Code of Australia* (BCA). The proposed built form components of the Activity would be classified under the BCA as:

- Class 9a (healthcare including administration, ambulatory care and back of house); and
- Class 10a (outbuildings – sprinkler pumproom, main switchboard and generator room, garden shed, dirty workshop and fleet vehicle parking).

The Report assessed the architectural design documentation against the applicable provisions of the BCA. It identified a number of issues which require further resolution, either by way of fire engineered Performance Solutions or plan amendments prior to the s6.28 BCA Crown Certificate stage. Notwithstanding, the Report considered that the proposed development could readily achieve compliance with the BCA, subject to resolution of the specific matters identified within the Report.

Accessibility

The proposed MPS facility has been designed to achieve equitable and dignified access to all areas across Community Health, Emergency, Inpatient Unit and Residential Aged Care. Further, a key design principle for the proposed landscaping regime is to *provide inclusive access to all external areas to cater for all abilities* (p32, **Appendix 9**).

A *BCA and DDA Assessment Report* was prepared for the Activity – see **Appendix 8**. The DDA Assessment involved a review of the proposed development against the minimum standard of compliance within AS1428 (Parts 1-3) and

Part D4 of the *Building Code of Australia* for access and facilities for people with disabilities. It found that the proposal does or can readily comply with all relevant provisions. The only exceptions relate to minor matters (e.g. requirement for additional information relating to doors and kerb provision) which can be addressed via redesign or the provision of additional information at Crown stage.

Crime Prevention through Environmental Design

The proposed facility has been designed in accordance with the principles of Crime Prevention through Environmental Design (CPTED). Key tenets incorporated into the design include:

- **Surveillance and visibility:** The MPS facility will be operational 24 hours a day, 7 days per week. CCTV would be implemented as appropriate. Overnight staff based within the Clinical Support area would have the ability to monitor CCTV footage around the facility. Clear sightlines would be maintained between public and private areas. Public access would be limited to areas that are well supervised. Lighting – including for carparks and external areas - would meet minimum requirements under Australian Standards (AS 1158 for external lighting and AS 1680 for internal lighting). Proposed landscaping of the grounds would provide welcoming and attractive recreational and congregation opportunities for users of the site, providing passive surveillance opportunities throughout the site.
- **Access control:** A single, central main entrance would provide public access to both the hospital and HealthOne components of the facility, allowing for simplified control and surveillance. Physical access control (e.g. via keycard entry) would be implemented to define staff-only areas throughout the hospital. Access control would apply to all building entry points after hours. All key areas accessible to the public would have a secondary egress connected to the duress system, allowing staff to utilise it as a route of escape from a potential aggressor.
- **Territorial reinforcement:** Fencing is proposed around dedicated courtyards. Landscaping and special paved zones at the site entry would provide clear indications of site boundaries, and would assist in wayfinding for site users.
- **Space management:** The building and grounds would be well-maintained to discourage crime.

Roadworks and Parking

The Activity will involve significant changes to the internal road network and parking layout within the site, as outlined in **Table 4** and illustrated in **Figure 8** below.

In summary, the proposal will result in the rationalisation of vehicle access into the site, with a new access from Queen Street providing dedicated access for heavy vehicles to back-of-house destinations near the site's northern boundary. The Osman Street entry and exit will be reserved for use by cars and ambulances, reducing potential for truck / car conflicts and increasing safety for pedestrians.

Overall, the proposal will result in an increase of 6 long-term parking spaces and 1 short-term parking space available for MPS users.

Table 4: Summary of proposed roadworks and parking changes

Existing MPS	Proposed Re-developed MPS
Vehicular access:	
<ul style="list-style-type: none"> • Main entry driveway from Osman Street – 2-way access for all vehicles (including heavy vehicles) 	<ul style="list-style-type: none"> • Existing driveway converted to entry-only from Osman Street - restricted to ambulances and cars
<ul style="list-style-type: none"> • Exit-only driveway to Osman Street – all vehicles (including heavy vehicles) 	<ul style="list-style-type: none"> • Exit-only driveway to Osman Street widened– restricted to cars and ambulances
<ul style="list-style-type: none"> • - 	<ul style="list-style-type: none"> • New dedicated heavy vehicle access from Queen Street, providing access to loading dock / ambulance drop-off at northern façade of building. Creation of new driveway / kerb crossing required

Existing MPS	Proposed Re-developed MPS
<ul style="list-style-type: none"> 2-way driveway providing direct access to adjacent Ambulance Station – ambulances only 	<ul style="list-style-type: none"> Repositioning and slight narrowing of the driveway required, resulting in one-way restriction - inbound ambulances only
Parking:	
<ul style="list-style-type: none"> Staff parking – 18 spaces, at-grade, near western boundary 	<ul style="list-style-type: none"> Existing carpark demolished. Staff to utilise existing at-grade visitor carpark adjacent to Osman Street (2 spaces deleted for driveway widening, however 2 new covered spaces in fleet vehicle carport) – 21 spaces. Access to staff carpark restricted via boomgates.
<ul style="list-style-type: none"> Visitor / patient parking – 19 spaces, at-grade, adjacent to Osman Street 	<ul style="list-style-type: none"> Existing carpark converted to staff use (see above). New at-grade carpark constructed adjacent to existing – 20 spaces, including 2 accessible spaces
<ul style="list-style-type: none"> On-street angled parking on Osman Street – 17 spaces 	<ul style="list-style-type: none"> No change – 17 spaces
<ul style="list-style-type: none"> Fleet vehicle parking – 5 spaces, carport near western boundary 	<ul style="list-style-type: none"> Existing carport demolished. New carport near northern boundary – 5 spaces (including 4 electric vehicle charging stations)
<ul style="list-style-type: none"> Short term pick-up / drop-off – 2 spaces near hospital entrance 	<ul style="list-style-type: none"> Existing spaces deleted. New 5-minute pick-up / drop-off spaces near hospital entrance– 3 spaces (including 1 accessible)
<ul style="list-style-type: none"> - 	<ul style="list-style-type: none"> New 'Special parking' (e.g. special access needs but without disability sticker, allocated by MPS staff) near hospital entrance– 2 spaces
Total parking available (short and long-term): 61 spaces	Total parking available (short and long-term): 68 spaces
Pedestrian access:	
<ul style="list-style-type: none"> Multiple narrow pedestrian pathways from Osman Street 	<ul style="list-style-type: none"> A single, widened pedestrian pathway from Osman Street

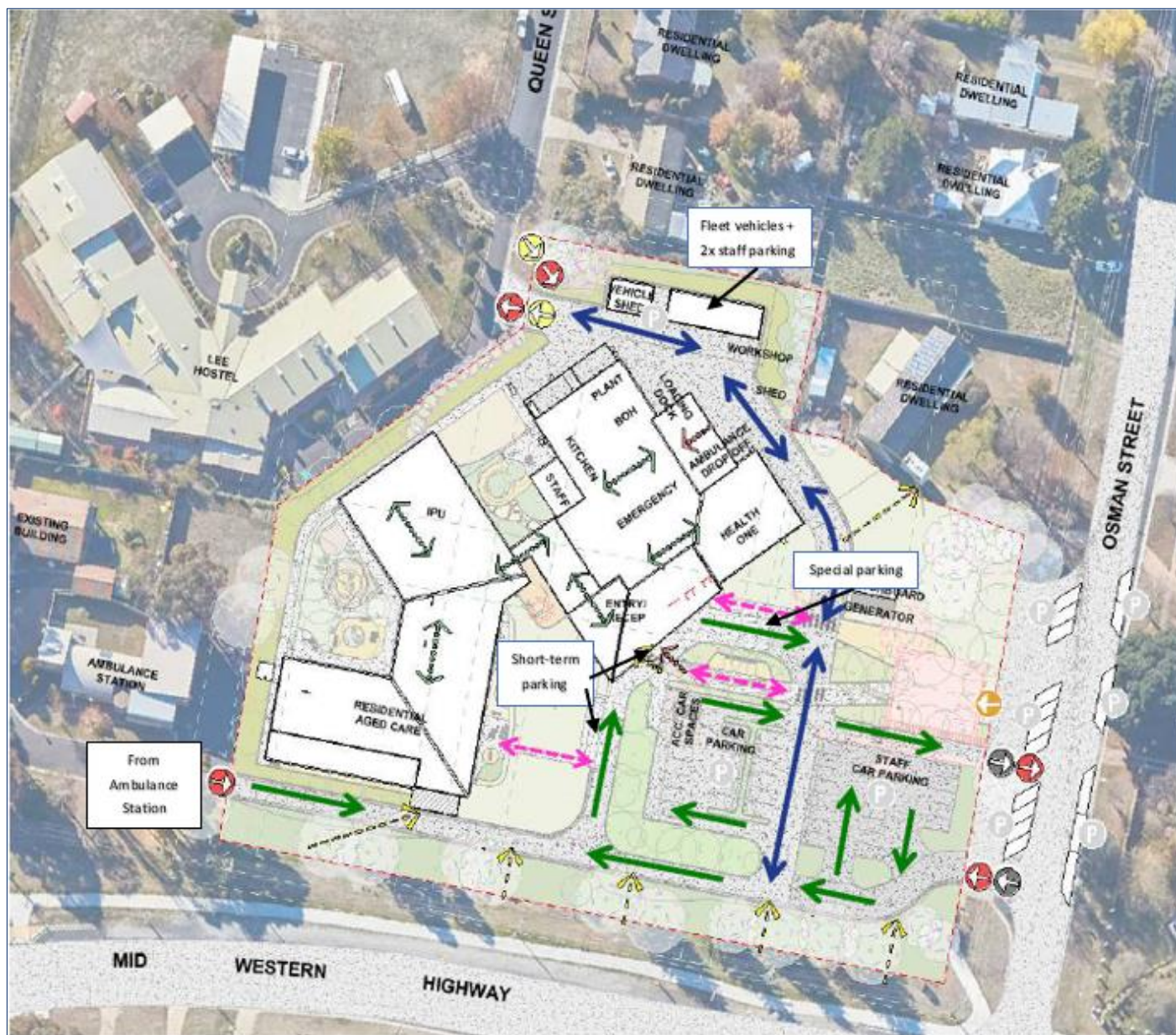


Figure 5.3: Diagram - Access and Circulation

Base Source: Blayney Design Development Report

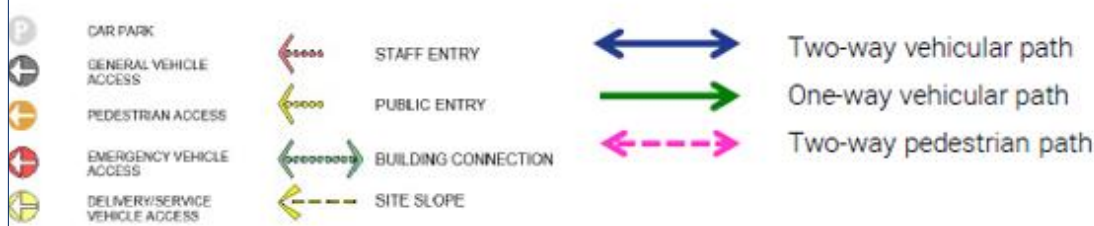


Figure 8: Proposed vehicular and external pedestrian circulation plan

Tree Removal and Landscaping

Sixty (60) trees, mainly comprising exotic species, are located within the site and its immediate surrounds. Most of these trees comprise exotic species planted for amenity value, as detailed within the *Tree Assessment Schedule* within the *Arboricultural Impact Assessment (AIA)* at **Appendix 10**.

To facilitate the proposed Activity, the AIA recommended the removal of 27 tree specimens (45% of the total). At the time of writing of the AIA, 2 native trees were proposed for removal, comprising 2 'Yellow Box' trees (*Eucalyptus melliodora*).

No trees within the site have been identified as being of national, state or local heritage significance and none are listed as a threatened species under NSW or Commonwealth legislation. One tree, an exotic Crab Apple (*Malus floribunda*), has been identified as having significant commemorative value and is proposed to be retained and transplanted as a feature tree into the Residential Aged Care courtyard.

Since the AIA was drafted, additional design changes have resulted in amendments to the proposed tree removal / retention strategy outlined within the AIA. Trees now proposed to be removed and retained are identified in the *Tree Management Plan* at **Figure 35** and described in **Section 6.2.9** of this REF. The total number of trees to be removed has been reduced to 25, approximately 41% of the existing number (although this number is to be confirmed via additional arborist review, as outlined in **Section 6.2.9**). The Activity no longer proposes the removal of native tree species; only planted, exotic garden species.



Figure 9: Proposed landscape layout (Stage 3)

Regardless, to offset the loss of existing trees, significant landscaping of the site is proposed, including 32 replacement tree specimens. All of these trees are one of various species of *Eucalyptus*. The proposed landscaping concept is illustrated at **Figure 9** above, and detailed in the *Landscape Plans* at **Appendix 4**. Key facets of the landscaping regime include:

- Landscaped screening zones along the site boundaries, to maximise privacy between sites;
- An entry garden sequence to provide clear navigation to the main building entry;

- Paving design, selected tree planting and a proposed dry garden to reflect the outcomes of Connecting with Country consultation;
- The use of a range of local endemic and regionally endemic plant species and habitats to improve site biodiversity and minimise watering / fertilising requirements;
- Clearly defined wayfinding, the use of robust and trafficable materials, and ease of accessibility throughout the site;
- Discrete, fenced courtyard spaces for staff, inpatients and residential aged care residents. Key focuses of these courtyard designs are inclusive accessibility to all users, opportunities for Aboriginal cultural immersion (e.g. yarning circle within the RAC courtyard), sensitivity to use (e.g. semi-private palliative care courtyard) and the creation of calming, healing and familiar environments.

Utilities

The site has available access to telecommunications services (Telstra), NBN, electricity, sewer, potable water, natural gas, and the stormwater drainage trunk main system.

The general approach to servicing the site is outlined in the *Engineering Concept Design Report* (ECDR) at **Appendix 11**. Whilst the ECDR notes that the natural gas supply to the site will be maintained to supply gas hot water heaters, it is understood this connection will be de-commissioned upon project completion in order to allow for full electrification of the site (and subsequent potential future carbon neutral operations).

A number of services will require upgrading or augmentation. In particular, a new 500kVA kiosk transformer is proposed to be installed adjacent to the Osman Street boundary, within a dedicated easement. A new emergency backup generator (250kVA diesel generator) will support up to 100% of the anticipated demand; while a new site switchboard will service all site electrical services.

A new 150kW rooftop solar photovoltaic system is proposed to augment the facility's electrical power supply.

Earthworks

The proposed finished surface level is designed for the 1% Annual Exceedance Probability plus 500mm freeboard (see **Section 6.2.5** of this REF for further discussion on flood levels). This will result in the following finished building levels:

- Residential aged care (RAC) wing: RL 874.65m AHD
- Health One wing: RL 874.20m AHD

The existing ground levels are shown in the *Site Survey* at **Appendix 12**. **Figure 10** below illustrates the proposed cut and fill plan for bulk earthworks.

The RAC wing will require approximately 1.3m cut in the south-west corner of the site, and will require a retaining structure. The HealthOne wing will require approximately 1.2m of fill on the north-eastern corner of the building, adjacent to the boundary, and will also require a retaining structure. The proposed retaining wall locations are shown within the *Civil Design Report* at **Appendix 5**.

The *Civil Design Report* also presents proposed cut and fill volumes for bulk earthworks, which suggest a net cut volume of around 162m³ for the overall site. Any clean excess spoil (soil) will be used within landscaping treatments throughout the site or removed from site and disposed of appropriately.

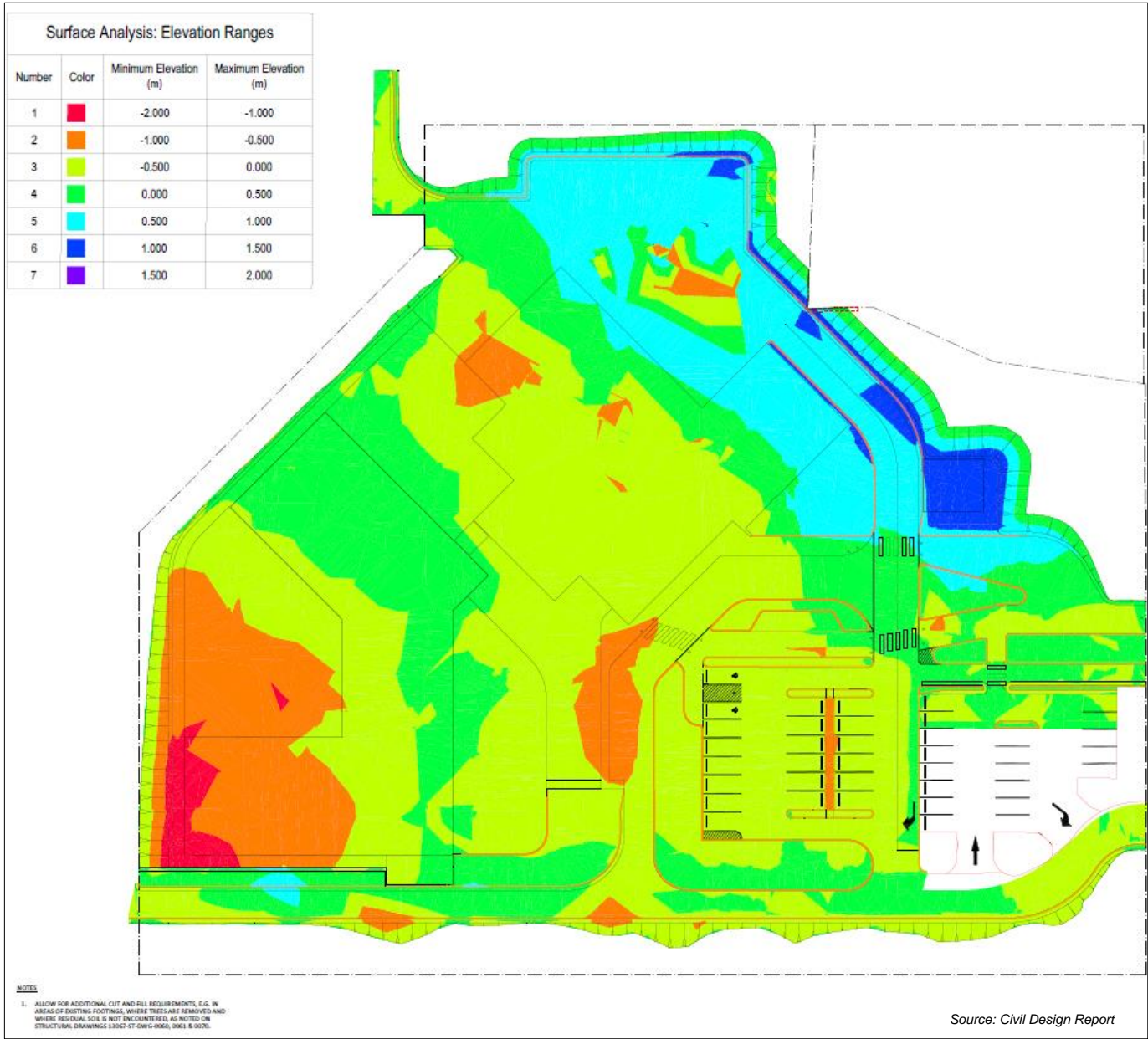


Figure 10: Cut and Fill Plan extract

Site Contamination Remediation

As outlined within **Section 6.2.13** of this REF, the site is currently impacted by areas of contaminants. Several hazardous materials are present throughout the existing MPS structures and buildings.

The Activity will be undertaken in accordance with the directives of the *Remediation Action Plan* at **Appendix 13**, which includes consideration of hazardous materials currently on site. Accordingly, contamination is anticipated to be resolved and the site will be made suitable for ongoing use as a hospital.

Ancillary Facilities

A temporary contractor site compound and material stockpile areas would be established within the site, as indicated within the *Preliminary Construction Management Plan* at **Appendix 14**. The appointed contractor will be required to undertake an initial site-specific safety check prior to site establishment. Site containment fencing will be erected to restrict public access to the works zone. The temporary fencing will be secured from any unauthorised access via padlock. Tree protection works will be maintained throughout the construction phase in order to protect the integrity of existing trees proposed for retention.

Prior to the commencement of work, contractor staff will be inducted on the works methodology, environmental issues and key mitigation relating to the works. The immediate neighbours will be given written notification of the works and anticipated works period.

Erosion and sediment controls would be designed and implemented prior to undertaking the activity. The controls would be maintained during the project and would not be removed until the site has been suitably stabilised.

Staging of Construction

The proposed demolition and construction activities will be staged in order to allow for the continued occupation and operation of the MPS facility, with minimal disruptions. Certain elements will be constructed on a temporary basis (e.g. a carpark, a link between existing and new elements of the hospital), and will be demolished upon the completion of the construction phase.

The key elements of each of the proposed 3 stages are outlined in **Figure 11**, **Figure 12** and **Figure 13** below. Additional details are provided in the *Architectural Plans* at **Appendix 2**.

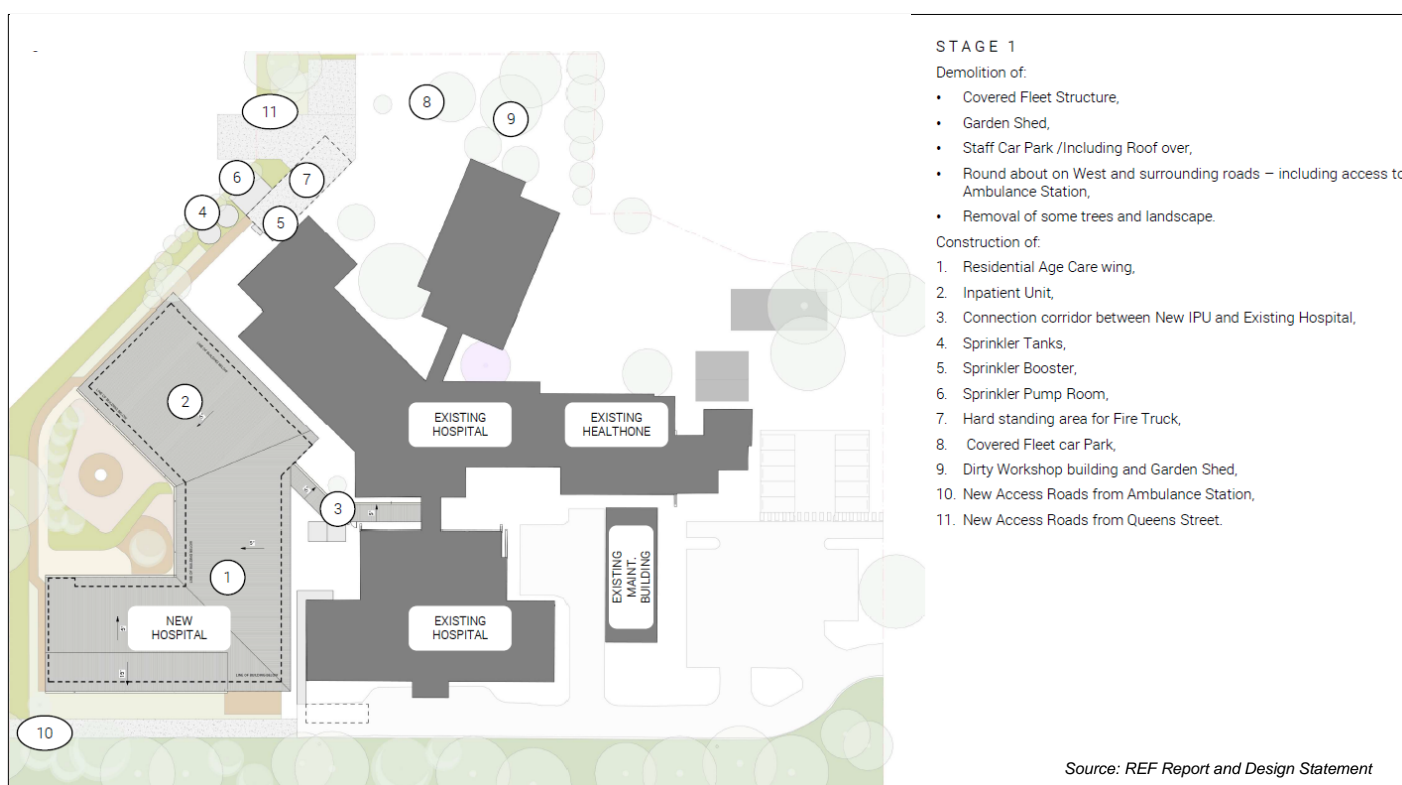


Figure 11: Overview of proposed Stage 1 of Activity

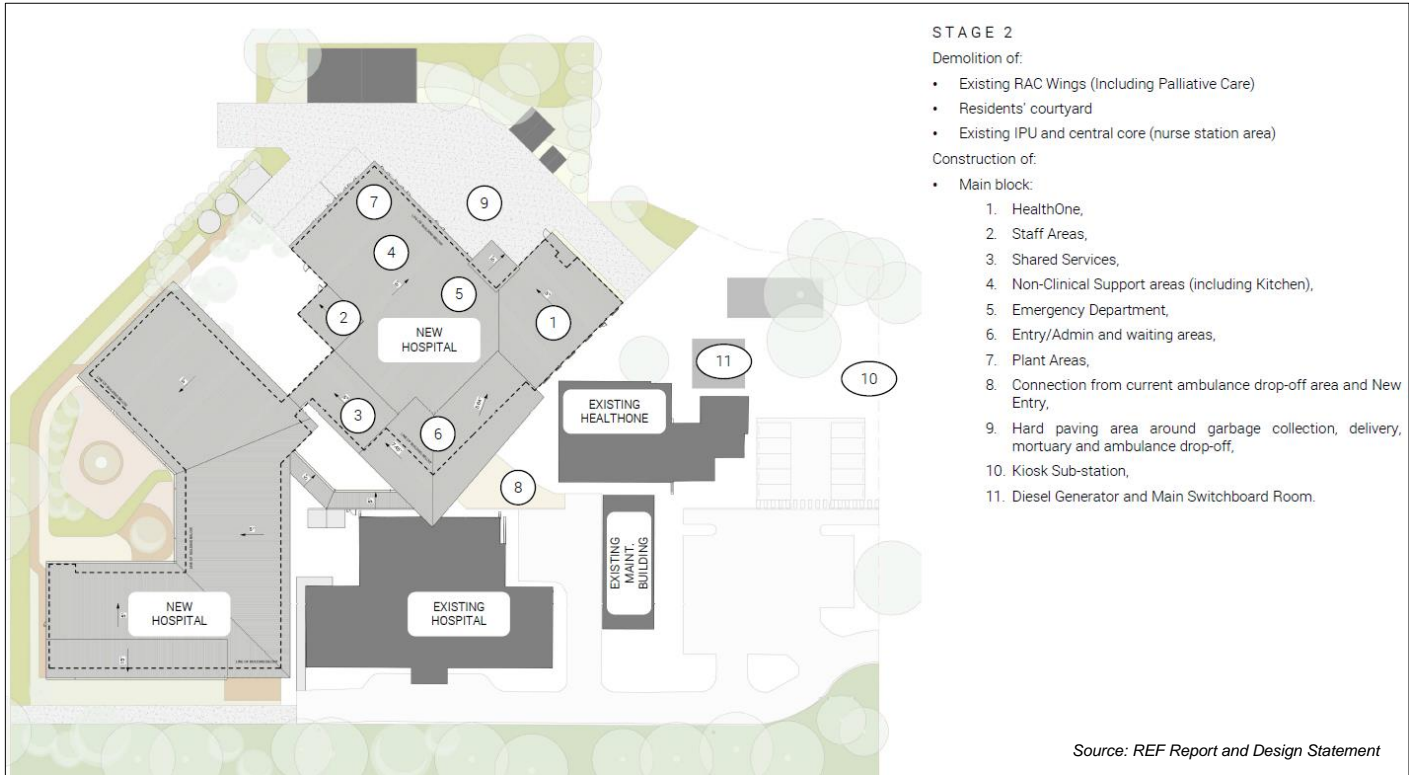


Figure 12: Overview of proposed Stage 2 of Activity



Figure 13: Overview of proposed Stage 3 of Activity

3.2 Proposal Need, Options and Alternatives

3.2.1 Strategic Justification

Multipurpose Services are local facilities that combine a range of health and aged care services. Each service is tailored to meet the community's unique clinical needs into the future.

The NSW Government is undertaking a \$297 million Multipurpose Service Program aimed at improving access to health and aged care services across smaller rural and remote communities. Traditional hospital structures and models of care have changed to reflect evolving health needs in regional and remote environments. There is now a greater emphasis on primary health care, including health improvement and prevention programs, delivered in an integrated way. In small communities, more flexible service models are being delivered as part of a more client-focused approach, responsive to community needs.

A Clinical Services Plan has been developed for Blayney, which outlines the future directions for the Blayney MPS to help meet the needs of the community into the future. Design development, based on this Plan, has led to the current proposal for the major re-development of the Blayney MPS site.

3.2.2 Alternatives and Options

The existing Blayney MPS facility is around 40 years old and no longer meets industry best practice standards. The construction of a new MPS facility on the site will provide:

- Residential aged care accommodation providing care to aged care residents with high care needs including clients with dementia who have been assessed as suitable for an MPS. Blayney MPS also provides respite care for low and high care residents.
- Inpatient services that will provide low level acute care to patients including palliative care in line with the agreed role delineation.
- Emergency services including stabilization and management in preparation for admission or transfer of care in line with level 1 role delineation.
- Imaging services including general x-ray with a visiting Radiographer onsite from the Cowra Health Service - two days a week.

Overall, the goal for the project team is *to deliver a sustainable long-term health service precinct that can be efficiently delivered in a regional context and staged to support the operational continuity of the hospital* (p3, **Appendix 3**).

An overview of the alternatives, and an identification of the preferred alternative, for the Proposal are provided within **Table 5** below.

Table 5: Alternatives considered for the proposal

Alternative description	Advantages and disadvantages	Preferred alternative
Continue using the Blayney MPS in its current form	<p>The existing MPS is over 40 years old. A detailed assessment of the facility indicated a number of functional suitability issues; operational efficiency concerns and clinical compliance concerns. A building condition assessment indicated that, apart from the newly renovated ED, all spaces in the hospital are aged, undersized, and show signs of wear and tear. Although the ED is newly refurbished the space does not align with contemporary standards.</p> <p>Whilst continuing use of the facility in its current form would be feasible, the existing issues would remain.</p>	

Alternative description	Advantages and disadvantages	Preferred alternative
Identify a new location and build a new MPS facility	During the masterplanning phase, 11 potential sites around Blayney were examined to determine their appropriateness for a MPS facility, including the existing site. The sites were assessed by the Project Team and executive user groups against various criteria including the site area, cost, relevant planning controls, ownership, and risk profile. A detailed assessment and scoring process resulted in the existing MPS site being selected as most appropriate.	
Demolish the existing MPS and develop a new MPS on the same site	As discussed above, a detailed masterplanning process resulted in the identification of the existing site as most appropriate for the continued functioning of a wholly-redeveloped MPS facility.	✓

3.3 Construction Activities

The works are long term (approximately 21 months). The construction and demolition phases are proposed to occur over 3 discrete stages, to maintain the uninterrupted operations of the MPS throughout.

Table 6: Project Timeframes and Construction Activities

Construction activity	Description
Commencement Date	The main construction works are anticipated to commence in September 2024.
Work Duration/Methodology	<p>The works are anticipated to take approximately 21 months. The anticipated work phases are as follows:</p> <ul style="list-style-type: none"> - Stage 1: approximately 9 months - Stage 2: approximately 10 months - Stage 3: approximately 2 months. <p>The MPS facility would continue to operate fully throughout the construction phase.</p>
Work Hours and Duration/Construction	<p>Works will be undertaken during standard hours as per the <i>Interim Construction Noise Guideline</i>:</p> <ul style="list-style-type: none"> - Monday to Friday: 7:00AM to 5:00PM - Saturdays: 8:00AM to 1:00PM - Sundays and Public Holidays: No works
Workforce/Employment	The numbers of construction personnel onsite will fluctuate depending on the stage of the works. The peak personnel per day required is currently unknown. The Contractor will be required to undertake an analysis of the required workforce in accordance with the noise, traffic and physical distancing requirements at all stages of construction. This will be incorporated within the finalised Construction Management Plan.
Ancillary Facilities	A temporary site compound and material stockpile areas would be established within the Activity area. Site containment fencing will be erected to restrict public access to the works zone. Erosion and sediment controls would be designed and implemented prior to undertaking the activity. Tree protection works would be established around trees proposed for retention. The controls would be maintained during the project and would not be removed until the site has been suitably stabilised.

Construction activity	Description
Plant Equipment	The main plant likely to be utilised includes, but is not limited to, the following: <ul style="list-style-type: none"> - boom lifts; - cranes; - excavators; - machinery; - conveyors; - forklifts; - heavy vehicles
Earthworks	Bulk earthworks are required in order to provide a level base for buildings, roads and other infrastructure. Details are provided in the <i>Civil Design Report</i> at Appendix 5 . Topsoil will be stockpiled on site for re-use in landscaped areas.
Source and Quantity of Materials	Any required materials will be sourced locally from licensed quarries, suppliers and operators. All materials will be certified uncontaminated and environmentally safe.
Traffic Management and Access	Construction access to the site will be via Osman Street and Queen Street. Construction traffic management will be undertaken in accordance with an approved Construction Management Plan.

3.4 Operational Activities

Use

The new Blayney MPS facility would continue the operations of the existing facility. The capacity of the facility would be slightly expanded, as outlined in **Table 2** above. However, the overall use of the site would remain essentially the same.

In summary, the new facility would provide the following key services at a HI role delineation level of 1 or 2:

- Residential aged care accommodation providing care to aged care residents with high care needs, including clients with dementia. Respite care for low and high care residents would also be provided.
- Inpatient services that will provide low level acute care to patients including palliative care.
- Emergency services, including stabilisation and management in preparation for admission or transfer of care in line with level 1 role delineation.
- Imaging services, including general Xray with a visiting radiographer (2 days per week).
- Western NSW LHD community health, outpatient / ambulatory services and Hospital in the Home services.
- HealthOne – a range of networked level 1 and 2 primary and community care services including physiotherapy, child and family health nurse clinic, community and primary health care nurses, women's health nurse, diabetes educator, speech pathology, oral health, virtual fracture clinic, community mental health, aged care assessment program, occupational therapy, drug and alcohol treatment, exercise physiology, palliative care, social work, medical imaging, day care, chronic and complex services, podiatry, private clinical psychologist, psychiatrist, dietician, geriatrician, Aboriginal health – dental and pathology.

Operation Hours

The proposed MPS facility would have the following broad service streams:

- Monday to Friday, 8:30am – 5:00pm: These services would include primary and ambulatory care clinics, day programs and healthy lifestyle activities. Some specific activities / services would operate extended hours.
- Monday to Sunday, 24 hours: Services including residential aged care, inpatient services and emergency services would operate continuously.

All services and facilities would be accessible to the public via the main entrance doors. Outside of standard business hours, visitors would contact staff via a video intercom system at the main entrance in order to gain admission.

Ambulance presentations would enter via the dedicated ambulance entrance on the building's northern façade, 24 hours a day.

Staff / Patients

The proposed MPS facility would result in a slight increase in service capacity compared to the existing provision, as outlined in **Table 2** of this REF. In summary, the Activity would result in the following capacity increases:

- 3 additional inpatient beds;
- 2 additional ambulatory care treatment bays;
- 3 additional consulting rooms (HealthOne);
- 1 new mental health interview room.

Otherwise, the MPS capacity would remain essentially the same as existing.

The MPS facility is expected to be staffed at a rate of 53.72 Full Time Equivalent (FTE) staff by the year 2032, including management and executive staff, nurses, service and maintenance staff, visiting services (e.g. speech pathologist, dietician) and leased services / space (e.g. GPs, dental). The Blayney MPS currently has a FTE roster of 36.84 staff.

Traffic and Parking

The proposal would result in changes to the existing road and parking area layout, as outlined in **Table 4 (Section 3.1.2)** of this REF. In summary, the proposal would result in a net increase of 6 long-term parking spaces, and 1 short-term parking space. Vehicular access into the site would continue to be via Osman Street. However heavy vehicles and other specialised vehicles (e.g. funeral director vehicles) would enter the site via a new access off Queen Street. Ambulances would continue to access the site via a dedicated driveway at the western boundary.

The Activity is anticipated to result in a net increase of approximately 12 vehicle trips during peak periods, as a result of the slightly expanded service capacity and future anticipated staff increases. These trips are anticipated to have a negligible impact on the surrounding road network.

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, 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. Chapter 2, Part 2.3, Division 10 of the TISEPP outlines the approval requirements for 'health services facilities'. Pursuant to the Standard Instrument definition, the existing Blayney MPS would satisfy the definition of a 'hospital', which is a form of 'health services facility'. The proposed re-developed Blayney MPS would also satisfy the definition of a 'hospital', inclusive of ancillary facilities such as 'day surgery, day procedures or health consulting rooms'; 'patient transport facilities including car parking'; and 'mortuaries'.

Pursuant to Sections 2.61(1)(a) and 2.61(1)(c) of the TISEPP, the erection or demolition of a building that is a 'health services facility' may be carried out without consent by or on behalf of a public authority, if the development is carried out within the boundaries of an existing health services facility. However, Section 2.61(2) does not permit the erection of any building that exceeds 15m in height or is located closer than 5m to any property boundary.

The proposal involves the demolition of an existing 'health services facility' and the erection of a new 'health services facility' by HI (a public authority) within the boundaries of the existing Blayney MPS. Accordingly, pursuant to Sections 2.61(1)(a) and 2.61(1)(c) of the TISEPP, the proposed works are classified as development which may be carried out without consent. Furthermore, the proposed buildings will not exceed 15m in height and will be positioned greater than 5m from any property boundary.

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 it involves the 'erection of a building', the 'carrying out of a work' and the 'demolition of a building or work'. Further, it does not comprise any act, matter or thing for which development consent under Part 4 is required; is not prohibited under an environmental planning instrument; and is not exempt development.

TISEPP consultation is discussed within **Section 5** of this REF.

Table 7: Description of proposed activities

Chapter 2, Part 2.3, Division 10 within TISEPP	Description of Works
2.61(1)(a)	The proposed activity includes the erection of a building which is a 'hospital' (a form of 'health services facility'), which may be carried out without consent by or on behalf of a public authority on any land if the development is carried out within the ground of an existing health services facility.
2.61(1)(c)	The proposed activity includes the demolition of a building which is a 'hospital' (a form of 'health services facility'), which may be carried out without consent by or on behalf of a public authority on any land if the development is carried out within the ground of an existing health services facility.

4.2 Environmental Protection and Biodiversity Conservation Act 1999

Pursuant to the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action that has, or is likely to have, a significant impact on matters of national environmental significance (MNES) or other aspects of the environment, such as on commonwealth land, may progress only with approval of the Commonwealth Minister for the Environment under Part 9 of the EPBC Act.

An *EPBC Act Protected Matters Report* was generated on 9 February 2023 to identify records of MNES recorded within the site plus a 1km buffer area (**Appendix 15**). Results indicate 32 listed threatened species and 12 listed migratory species have been recorded within the search area and potential habitat occurs for 2 Threatened Ecological Communities. Further, the Report noted the proximity of wetlands of international importance (Ramsar wetlands) approximately 700 – 1,000km downstream.

Regardless, the Activity site is within the previously cleared, maintained grounds of an existing hospital dominated by predominantly exotic tree plantings and extensive areas of lawn. The *Ecological Assessment* prepared for the proposal (see **Appendix 16**) states that *Significant Impact Assessments under the EPBC Act have acknowledged that no threatened species or EECs are likely to be impacted due to the minor nature of the proposal. Any potential impacts will be minor. Provided that the recommendations below are adhered to, it is unlikely that any viable local populations / communities are placed at risk* (p40). In summary, the Activity is unlikely to have a significant impact on any threatened species or communities listed under the BC Act, EPBC Act or FM Act. Further, the distance from Ramsar wetlands and proposed stormwater management measures will ensure there are no detrimental impacts upon these MNES.

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, nor does the proposed development affect any matters of national significance, as outlined above. An assessment against the EPBC Act checklist is provided at **Table 5** below.

Table 8: EPBC Checklist

Consideration	Yes/No
The activity will not have any significant impact on a declared World Heritage Property?	No
The activity will not have any significant impact on a National Heritage place?	No
The activity will not have any significant impact on a declared Ramsar wetland?	No
The activity will not have any significant impact on Commonwealth listed threatened species or endangered community?	No
The activity will not have any significant impact on listed migratory species?	No
The activity does not involve nuclear actions?	No
The activity will not have any significant impact on Commonwealth marine areas?	No
The activity will not have any significant impact on Commonwealth land?	No
The activity does not relate to a water resource, 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 sub-section 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 6.1** of this REF specifically responds to the factors for consideration under section 171 of the EP&A Regulation.

Error! Reference source not found. below demonstrates the effect of the proposed development activity on the matters listed for consideration in sub-section 3 of section 5.5 of the EP&A Act.

Table 9: Matters for consideration under Sub-Section, Section 5.5 of the EP&A Act

Matter for Consideration	Impacts of Activity
<p>Sub-section 3:</p> <p>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.</p>	<p>The site is not located within a wilderness area, nor in proximity to a wilderness area. Therefore, the Activity will not impact wilderness areas.</p>
<p>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.</p>	

4.4 Environmental Planning and Assessment Regulation 2021

Section 171(2) of the EP&A Regulation provides a list of factors that must be taken into account for an environmental assessment under Part 5 of the EP&A Act. These requirements are considered at **Section 6.1** 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 10: Other Possible Legislative Requirements

Legislation	Comment	Relevant? Yes/No
State Legislation		
<i>Rural Fires Act 1997</i>	<p>The site is not mapped as bushfire prone land.</p> <p>Regardless, bushfire risk is addressed within this REF.</p>	<p>No</p> <p>Refer to Section 6.2.10 of this REF</p>
<i>Biodiversity Conservation Act 2016</i>	<p>Part 7 of the <i>Biodiversity Conservation Act 2016</i> (BC Act) sets out the requirements for biodiversity assessment and approvals under the EP&A Act. For the purposes of Part 5 of the EP&A Act, an activity is to be regarded as likely to significantly affect the environment if it is expected to significantly affect threatened species.</p> <p>The proposed Activity will occur on an established suburban site dominated by exotic tree plantings and lawn. It is not known to contain any critical habitat, threatened species or ecological populations or communities. No native trees are proposed to be removed. The <i>Ecological Assessment</i> at Appendix 16 notes that <i>Assessments of Significance under the BC Act (five-part tests) ... have acknowledged that no threatened species or EECs are likely to be impacted due to the minor nature of the proposal. Any potential impacts will be minor. Provided that the recommendations below are adhered to, it is unlikely that any viable local populations / communities are placed at risk</i> (p40). Therefore the Activity will not have a significant impact upon any threatened species, ecological communities or populations such that a viable local population will be placed at risk of extinction.</p>	<p>No</p> <p>Refer to Section 0 of the REF</p>
<i>Water Management Act 2000</i>	<p>The site is located approximately 67m north-east of the nearest mapped watercourse, comprising a drainage line starting just north of Medway Street.</p>	<p>No</p> <p>Refer to Section 6.2.5 of the REF</p>
<i>Contaminated Land Management Act 1997</i>	<p>A search of the NSW Environmental Protection Authority (EPA) contaminated land data base was undertaken for the Blayney Local Government Area on 22 February 2023. The search returned zero contaminated sites within the search area.</p> <p>Regardless, detailed site assessments indicate the site is affected by areas of contaminants, and remediation is proposed.</p>	<p>Yes</p> <p>Refer to Section 6.2.13 of the REF</p>

Legislation	Comment	Relevant? Yes/No
<i>Heritage Act 1977</i>	<p>The <i>NSW Heritage Act 1977</i> provides for the conservation of items of environmental heritage in NSW. The Act defines heritage as items or places that are of State and/or local heritage significance and includes: places, buildings, works, relics, moveable objects and precincts. As part of NSW heritage protection and management, the Act establishes a register including an inventory and list to protect the listed items.</p> <p>Searches of the State Heritage Register were undertaken on 22 February 2023, and returned no heritage items within or adjacent to the site. Regardless, detailed site assessments indicate the presence of locally listed heritage items within the vicinity of the site. The proposal's impact on these items is discussed within the REF.</p>	Yes Refer to Section 6.2.8 of this REF
<i>Roads Act 1993</i>	<p>Section 138 of the <i>NSW Roads Act 1993</i> requires that all activities undertaken within Council's road reserve be approved by Council prior to the activities being undertaken. HI will need to obtain a Section 138 Approval for works within the road reserve/connection of the new driveways to Osman Street and Queen Street.</p> <p>Otherwise no works are proposed to occur within the road reserve of a public road, nor is the pumping of water onto a public road proposed.</p>	Yes
Other Acts as required	Yes -see below	
<i>National Parks and Wildlife Act 1974</i>	<p>The <i>National Parks and Wildlife Act 1974</i> (NPW Act) provides for the legal protection and management of Aboriginal sites within NSW. The key principles of the Act in relation to Aboriginal heritage are the prevention of unnecessary or unwarranted destruction of Aboriginal objects, and the active protection and conservation of objects which are of high cultural significance. It is an offence to knowingly disturb an Aboriginal object, irrespective of its nature or significance, without the prior consent of the relevant Director-General.</p> <p>To address this issue, an <i>Aboriginal Due Diligence Assessment (Appendix 17)</i> was prepared. It found that the entire site has low archaeological potential. However, to limit any potential impact on any unknown Aboriginal sites or objects, mitigation and management measures are proposed in this REF to provide the necessary safeguards.</p>	Yes Refer to Section 6.2.7 of this REF
State Legislation Planning Policies		
State Environmental Planning Policy (Biodiversity and Conservation) 2021	<p>Chapter 2 – Vegetation in Non-rural areas</p> <p>This Chapter is relevant, as the site is zoned R1 General Residential (a non-rural area). However, Subsection 2.7(1) outlines clearing that does not require authority under this Policy, noting <i>a permit or approval to clear vegetation is not required under this Chapter if it is clearing of a kind that is authorised under the Local Land Services Act 2013 (Clearing authorised under other legislation) section 600 or under Part 5B (Private native forestry).</i></p> <p>Subclause 600(b)(ii) of the <i>Local Land Services Act 2013</i> provides that the clearing of native vegetation within a regulated rural area is authorised under other legislation if the clearing was an activity <i>carried out by a determining authority within the meaning of Part 5 of that Act after compliance with that Part.</i> As the proposal is a Part 5 Activity, authority for clearing is not required pursuant to Chapter 2 of this SEPP.</p>	Yes

Legislation	Comment	Relevant? Yes/No
State Environmental Planning Policy (Resilience and Hazards) 2021	<p>Chapter 4 Remediation of land</p> <p>The objective of Chapter 4 of the RHSEPP is to provide for a State-wide planning approach to the remediation of contaminated land. It aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Chapter 4 applies to rezoning and development applications for development requiring consent.</p> <p>The Proposal does not require development consent pursuant to provisions of ISEPP. As the proposed development does not involve a change of use and does not involve a development application, the provisions of Section 4.6 of the RHSEPP are not triggered. However, HI must still consider the potential for the land to be contaminated and make a determination of suitability of the land for its intended use. Under Section 4.5.1 of the <i>Managing Land Contamination Planning Guidelines SEPP 55—Remediation of Land</i> (1998), remediation is a Part 5 activity when:</p> <ul style="list-style-type: none"> it is carried out ancillary to an activity under Part 5, for example, development which does not require consent under Part 4, and which requires an approval from a public authority, or it is in category 2 (without consent) under SEPP 55 and an approval from a public authority is required. <p>Furthermore, Section 4.16(3) of Chapter 4 outlines that if a provision of another State environmental planning policy or of a regional environmental plan, whether made before or after this Chapter, permits a remediation work without development consent, a requirement in this Policy to obtain development consent to carry out the work does not prevail over that provision.</p> <p>On this basis, any proposed/required remediation work described in this REF is ancillary to the Activity under Part 5 of the EP&A Act, which is principally for a health services facility which is permitted as development without consent pursuant to ISEPP. Further, the <i>Remediation Action Plan</i> (RAP) prepared for the site indicates that the remediation required falls within Category 2.</p> <p>Several contamination assessments of the site have been undertaken, which determined that the site is affected by contaminants and does require remediation. Regardless, the RAP concluded that <i>the site can be made suitable for the proposed development via remediation and the implementation of this RAP</i> (p.iii).</p>	Yes Refer to Section 6.2.13 of this REF
State Environmental Planning Policy (Transport and Infrastructure) 2021	<p>Chapter 2, Part 2.3, Division 10 of the TISEPP outlines the approval requirements for 'health services facilities'. It provides the planning approval pathway for the proposed Activity – see Section 4.1 of this REF for further details.</p> <p>In addition, the TISEPP provides that certain stakeholder consultation activities are undertaken in relation to a proposed Activity – see Section 5 of this REF for further details.</p>	Yes
Blayney Local Environmental Plan 2012		
Zone	<p>The site is zoned R1 General Residential – refer to Figure 14 below.</p> <p>The objectives of the zone are:</p> <ul style="list-style-type: none"> To provide for the housing needs of the community. To provide for a variety of housing types and densities. To enable other land uses that provide facilities or services to meet the day to day needs of residents. <p>The proposed Activity represents the ongoing and improved provision of health facilities and services to meet the needs of the community. Accordingly, it is consistent with the objectives of the zone.</p>	Yes
Height of Buildings	Clause 4.3: This provision has not been adopted within the Blayney LEP.	No

Legislation	Comment	Relevant? Yes/No
	Regardless, the proposed buildings are single-storey and the height will be compatible with the local area.	
Floor Space Ratio	Clause 4.4: This provision has not been adopted within the Blayney LEP.	No
Heritage	Clause 5.10: The site is not listed as containing a heritage item under the LEP, nor is it positioned within a heritage conservation area. However, a number of heritage items are within the vicinity of the site. Accordingly, a <i>Statement of Heritage Impact</i> was prepared (refer to Appendix 18) to assess the impact of the proposal on the heritage significance of these items. It concluded there would be no direct impacts and negligible indirect impacts on nearby heritage items. The impact of the proposed development would be minor and acceptable. Refer to Section 6.2.8 of this REF for further detail.	Yes
Flood Planning	Clause 5.21: The site is not mapped as containing floodprone land.	No
Terrestrial Biodiversity	Clause 6.3: The site is not mapped as containing 'biodiversity'.	No
Groundwater Vulnerability	Clause 6.4: The site is not mapped as 'groundwater vulnerability'.	No
Drinking Water Catchments	Clause 6.5: The site is not mapped as containing 'drinking water catchments'.	No
Riparian Land and Watercourses	Clause 6.6: The site is not mapped as containing 'riparian land and waterways'.	No
Essential Services	Clause 6.8: All essential services are available to the site.	No



Figure 14: Zoning Map – Blayney Local Environmental Plan 2012

5. Consultation

The REF scope of works was notified for 21 calendar days to the stakeholders outlined in **Table 11** below.

Table 11: Stakeholders required to be notified

Stakeholder	Relevant Section
Local Council	Section 2.10(2)
	Section 2.11(2)
	Section 2.12(2)
	Section 2.45(2)
	Section 2.62(2)
NSW State Emergency Services	Section 2.13(1)
Adjoining Landowners	Section 2.45(2)
	Section 2.62(2)

The notification commenced on 15 September 2023 and concluded on 7 October 2023. Copies of the notification responses received are provided at **Appendix 19**.

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

Note that no responses were received from adjoining landowners.

Table 12: Issues raised and responses

Issue raised	Date received	Response	Reference
Blayney Shire Council			
Kitchen facilities to meet the requirements of relevant standards / codes	04/10/2023	Noted. Facilities will be constructed in accordance with applicable standards.	-
Mortuary to meet the requirements of relevant legislation	04/10/2023	Noted. Facilities will be constructed in accordance with applicable standards.	-
Further consultation recommended to ensure Blayney Waste Facility can accept relevant waste types and quantities. Council later noted (05/10/2024) that this is more likely to be relevant to demolition waste.	04/10/2023	Operational waste management is addressed within the <i>Waste Management Plan</i> at Appendix 20 , and demolition waste will be addressed within a forthcoming Construction Waste Management Plan (CWMP). Appropriate disposal destinations for demolition waste will be identified as part of the CWMP.	Section 6.2.12
Consider tradewastes and disposal of medical waste.	04/10/2023	A Liquid Tradewaste Agreement will be entered into at the appropriate development stage. The disposal of medical waste is addressed within this REF.	Section 6.2.12
Sought clarification on relevant developer contributions	04/10/2023	Any required contributions will be paid before release of the Crown Development Certificate.	-
Advised DSP charges for sewerage generally exempt for this type of development	04/10/2023	Noted.	-
Stormwater is an improvement on the current situation	05/10/2024	Noted.	-

Issue raised	Date received	Response	Reference
Access and parking generally compliant with DCP	05/10/2024	Noted.	-
Section 138 of Roads Act permits are required to undertake any access works	05/10/2024	Noted. Appropriate permits will be sought at the relevant development stage.	-
NSW State Emergency Service			
Advocate for aged care facilities to be above the PMF and not subject to isolation	25/03/2024	The proposed facilities will be constructed at the 1% AEP flood planning level plus 500mm freeboard. Detailed assessment of flooding responses is proposed to occur to inform a Site Flood Emergency Response Plan.	Section 6.2.5
Note if failure of proposed flood levee / wall occurs, may lead to loss of life or widespread property damage. Recommend seeking advice from Department of Climate Change, Energy, the Environment and Water	25/03/2024	The flood wall / levee no longer forms part of the proposal.	Section 6.2.5
Note site is subject to vehicular isolation during 20% AEP event – potential exposure of occupants to secondary emergencies e.g. fires	25/03/2024	Detailed assessment of flooding responses, including the potential for vehicular isolation, is proposed to occur to inform a Site Flood Emergency Response Plan.	Section 6.2.5
Recommend seeking further information regarding isolation to inform the Flood Emergency Response Plan	25/03/2024	Noted – this is proposed to occur.	Section 6.2.5
Recommend seeking further information on impact of proposal on adjacent flood risk in all flood events	25/03/2024	Prior to construction, a Flood Risk Assessment (FRA) shall be prepared by a suitably qualified engineer. This assessment will include detailed assessment of offsite flooding impacts.	Section 6.2.5
Principle 1 - Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy	25/03/2024	As recommended, the proposed Site Flood Emergency Response Plan (SFERP) shall have regard to the Blayney Shire Flood Emergency Sub Plan.	Section 6.2.5
Principle 2 - Decisions should be informed by understanding the full range of risks to the community	25/03/2024	The forthcoming FRA will involve a full assessment of the flooding risks to the community, and the formulation of appropriate flooding responses. Note that a flood wall / levee is no longer proposed.	Section 6.2.5
Principle 3 - Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.	25/03/2024	The forthcoming FRA will involve a full assessment of the ability of the community to safely respond to a flood.	Section 6.2.5
Principle 4 - Decisions on redevelopment within the floodplain does not increase risk to life from flooding	25/03/2024	The forthcoming FRA and SFERP will carefully consider the likely users of the development, and their ability to respond to a flood event.	Section 6.2.5
Principle 5 - Risks faced by the itinerant population need to be managed	25/03/2024	The forthcoming SFERP will consider all likely users of the development, including visitors.	Section 6.2.5
Principle 6 - Recognise the need for effective flood warning and associated limitations	25/03/2024	The forthcoming SFERP will consider the implementation of appropriate flood warning mechanisms.	Section 6.2.5
Principle 7 - Ongoing community awareness of flooding is critical to assist effective emergency response.	25/03/2024	Appropriate flood communication strategies for site users throughout the life of the	Section 6.2.5

Issue raised	Date received	Response	Reference
		development will be detailed within the forthcoming SFERP.	

In addition to required statutory notification, additional consultation was undertaken with a wide range of stakeholders throughout the design process, including existing MPS staff, residents and their families, the community, Aboriginal groups, and the Health Council. Consultation activities included:

- Internal (MPS staff) information sessions / presentations;
- Project User Group meetings;
- Meetings / presentations with external stakeholders (e.g. Council, Blayney View Club);
- Community drop-in information sessions;
- Community online information sessions;
- Walk on Country with Aboriginal stakeholders; and
- Aboriginal Focus Group sessions.

Further details of this consultation process, as well as feedback received and details of how the Project was refined in response to this feedback, is provided within the *REF Application Communications and Engagement Report* at **Appendix 21**.

6. Environmental Impact Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

The relevant assessment considerations under Section 171(2) of the EP&A Regulation are provided below.

Table 13: Summary of Environmental Factors Reviewed in Relation to the Activity

Relevant Consideration	Response/Assessment		
a) Any environmental impact on a community	The proposed re-development will occur entirely within an established hospital site. Uninterrupted operation of the facility will be maintained throughout the construction phase. During construction, there will be noise impacts, however these will be temporally limited and will be managed by a Construction Management Plan. There will be minor visual impacts associated with the construction works, but again these will be temporally limited and managed. The proposal will not result in any other negative impacts on the community. Post-construction the proposal will provide an improved health service to the broader community. On balance, any environmental impacts on the community are anticipated to be positive.	-ve	
		Nil	
		+ve	✓
(b) Transformation of a locality	The proposed facility has been sympathetically designed to respect the site context and the character of the surrounding locality, including its single -storey height and sympathetic materiality and landscaping regime. While modernised and improved, the nature of the site will remain the same.	-ve	
		Nil	
		+ve	✓
(c) Any environmental impact on the ecosystem of the locality	The site has an established urban character, with few native trees and negligible habitat values present. The proposal will result in the retention of existing native trees and the planting of a significant number of new specimens. Site ecological assessments indicate there will be no detrimental impacts on threatened species or other biodiversity values. Stormwater will be managed to ensure there are no negative downstream impacts. On balance, the proposal is likely to result in an increase in available habitat values for local fauna (e.g. roosting, foraging plant species).	-ve	
		Nil	
		+ve	✓
d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	Negative visual and noise impacts associated with construction works will be short-term. The proposed new facility will contribute in a positive fashion to the existing neighbourhood character and will not impact heritage items in 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.	A <i>Statement of Heritage Impact</i> undertaken for the proposed Activity concluded that the development is acceptable and would not adversely impact the heritage significance of nearby heritage items (refer Section 6.2.8). An <i>Aboriginal Due Diligence Assessment</i> found there is very low probability of Aboriginal objects occurring in the Activity area (refer Section 6.2.7).	-ve	
		Nil	✓
		+ve	
(f) Any impact on the habitat of protected fauna (within the meaning of the National Parks and Wildlife Act 1974)	The Activity would occur within the established suburban grounds of an established hospital. An ecological assessment of the site indicates the absence of impacts on protected fauna (see Section 6.2.9).	-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	The Activity would occur within the established suburban grounds of an established hospital. An ecological assessment of the site indicates the absence of impacts on protected fauna or flora (see Section 6.2.9).	-ve	
		Nil	✓
		+ve	

Relevant Consideration	Response/Assessment		
(h) Any long term impacts on the environment	Impacts associated with construction works will be temporary and subject to mitigation measures (e.g. noise, visual, air quality). Permanent variation to the man-made environment as a result of the proposed Activity would be low impact (i.e. visual) and not detrimental or unreasonable in the locality. Long term impacts on the natural environment will be negligible. These matters are discussed in further detail in Section 6 .	-ve Nil +ve	✓
(i) Any degradation of the quality of the environment	Any increased storm water generated as a result of the proposed Activity has been assessed and management strategies will be incorporated to reduce the amount of runoff and maintain water quality. Erosion control measures will be implemented on site to minimise soil erosion. A large number of native trees are proposed to replace the wholly-exotic species proposed for removal.	-ve Nil +ve	✓
j) Any risk of safety of the environment	Mitigation measures (including remediation) are proposed to manage the risks associated with site contamination. The potential for flooding and bushfire risk is low and these matters are addressed in Section 6 .	-ve Nil +ve	✓
(k) Any reduction in the range of beneficial uses of the environment	The proposal will result in the ongoing use of the site for health services facility purposes.	-ve Nil +ve	✓
(l) Any pollution of the environment	The proposed design responds to the characteristics of the site and appropriate mitigation measures will be incorporated to minimise any potential pollution of the environmental (e.g. erosion control, water quality, contamination).	-ve Nil +ve	✓
(m) Any environmental problems associated with the disposal of waste	Waste management is addressed in Section 6.2.12 . Safeguards will be implemented during construction works to minimise potential waste impacts during construction. The MPS will operate in accordance with the <i>NSW Health Policy Clinical and Related Waste Management for Health Services</i> .	-ve Nil +ve	✓
n) Any increased demanded on resources (natural or otherwise) that are, or are likely to become, in short supply	Impacts associated with the consumption of natural resources would be minimal.	-ve Nil +ve	✓
(o) Any cumulative environmental effects with other existing or likely future activities.	No – refer to Section 6.2.15 .	-ve Nil +ve	✓
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions.	The site is not within the coastal zone.	-ve Nil +ve	✓
q) Applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1	The <i>Central West and Orana Regional Plan</i> identifies one of the NSW Government's main investments into the region as the establishment of Multipurpose Services across the region. These key investments highlight improved health services as a central priority for the region which aligns with the Plan's fourth goal to have dynamic, vibrant and healthy communities. The Activity aligns with these key priorities. Priority four of the <i>Blayney Local Strategic Planning Statement</i> aims to provide diverse housing choices which will meet the changing demographics and population needs. The MPS seeks to improve housing choice for senior residents within the locality.	-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?		✓
Will the works disrupt access to private properties?		✓
Are there likely to be any difficulties associated with site access?		✓
Are the works located in an area that may be highly sensitive to movement of vehicles or machinery to and from the work site (i.e. schools, quiet streets)?	✓	
Will full or partial road closures be required?		✓
Will the proposal result in a loss of onsite car parking?		✓
Is there onsite parking for construction workers?	✓	

Existing Environment

The site is located on the corner of Martha Street (also known as A41, the Mid Western Highway) and Osman Street. It also has a frontage to Queen Street, a dead-end residential street, at the north-western corner of the site. The existing traffic and parking environment is summarised in **Table 14** below. Note that there are no conveniently available public transport options available to the site, and no dedicated bicycle infrastructure is provided within or close to the site.

Existing vehicular access points are illustrated in **Figure 15** below, and existing parking infrastructure is illustrated in **Figure 16**.

Table 14: Existing traffic and parking environment summary

Existing	
Vehicular access	<ul style="list-style-type: none"> The main entry provides 2-way vehicular access from Osman Street; A secondary driveway provides exit-only vehicular access to Osman Street; and A third, single-lane driveway provides dedicated ambulance access to and from the site from the adjacent Ambulance Station (to the south-west)
Pedestrian access	Three separate pathways provide pedestrian access into the site from Osman Street. Two gated walkways connect to Queen Street.
Vehicular infrastructure	<ul style="list-style-type: none"> A roundabout in the south-western portion of the site allows larger vehicles to turn around and leave the site in a forward direction; Internal roads provide access throughout the southern and central areas of the site; and A loading dock on the western side of the main building provides access for deliveries and waste collection
Carparking	<p>61 carparking spaces are available for MPS use, as follows:</p> <ul style="list-style-type: none"> An at-grade staff carpark (western portion of site) provides 18 spaces; Covered parking for fleet vehicles (western portion) provides 5 spaces; An at-grade visitor carpark (near the main entry at Osman Street) provides 19 spaces; 2 short-term pick up / drop off spaces are located adjacent to the MPS main entry; and 17 angled parking spaces are provided on Osman Street, directly adjacent to the MPS site. While off-site, these spaces are in close proximity to the MPS building entries and provide convenient and popular parking for site users.



Figure 15: Existing vehicular access points

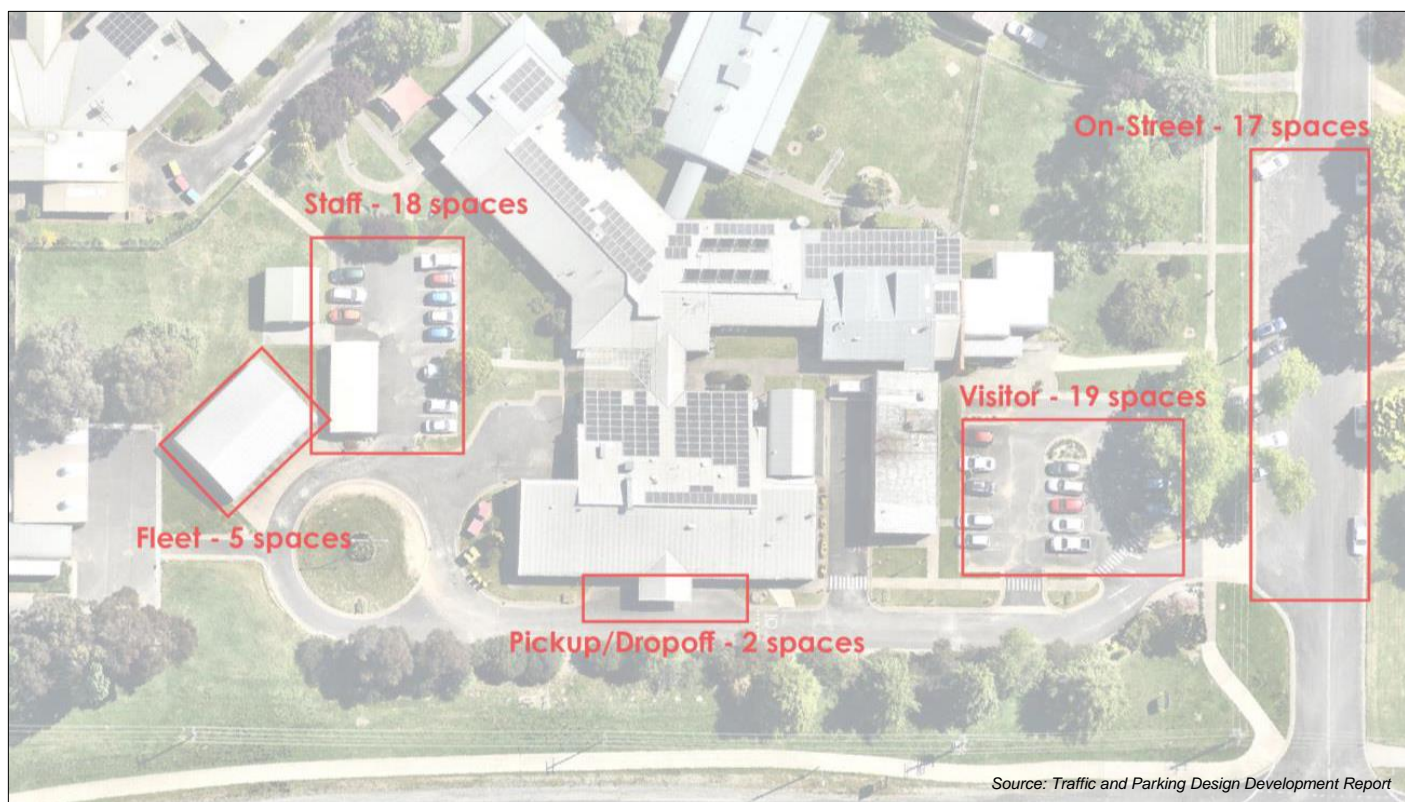


Figure 16: Existing carparking spaces within and adjacent to the site

A *Traffic and Parking Design Development Report* (TPDDR) prepared for the Activity notes the following with regard to the existing MPS operations (see **Appendix 22**):

- The busiest time of day is during the afternoon shift crossover (approximately 2 hours long), where up to 33 staff are expected on site;

- Peak parking demand occurs during the afternoon shift crossover, with a demand of up to 40 spaces calculated for all users of the site (excluding fleet vehicles). With a supply of 54 long-term spaces available (excluding fleet), the total parking supply is sufficient; and
- 24 Heavy Rigid Vehicles and 1 Medium Rigid Vehicle make deliveries / collections to the MPS in a typical week.

Impact Assessment

Construction Phase

Demolition of the existing MPS and its re-development would occur over 3 stages. Road network and parking changes which would be required during this period are summarised in **Table 15** and illustrated in the *Architectural Plans* at **Appendix 2**.

The TPDDR recommends the preparation of a Construction Traffic Management Plan to manage traffic and parking throughout this period.

Table 15: Road network – construction staging

Construction Stage	Road, Traffic & Parking Response
Stage 1	<ul style="list-style-type: none"> • Construction works would result in the demolition of existing fleet vehicle and staff parking. This loss would be partially offset by a 10-space temporary carpark constructed during an early works phase (already completed). Remaining demand would be adequately catered for via on-street parking on Osman Street. • The internal roundabout, currently used by heavy vehicles to turn around and leave the site in a forward direction, would be demolished. Heavy vehicles would instead enter the site via Oldham Place (Blayney Ambulance Station) and exit via Osman Street, as a temporary measure. A temporary loading bay for deliveries and garbage collection would be established along the southern façade of the existing building.
Stage 2	The new hospital building would be constructed, including back-of-house areas and ambulance bay. The Queen Street access would be established. Heavy vehicle access would be transferred to the Queen Street access on completion of this stage.
Stage 3	Final demolition works would be completed, allowing for the construction of the new carpark and internal roadways. The temporary carpark would be demolished at completion of this stage.

Operational Phase

The proposed changes to the traffic and parking situation as part of the re-development are outlined in detail in **Section 3.1.2** of this REF. The key features are summarised below:

- Long-term parking available to users of the site will increase by 6 spaces, and short-term parking will increase by 1 space (total of 68 spaces provided);
- Access from Osman Street will be limited to ambulances and cars only, via dedicated one-way entry and exit driveways;
- A new driveway to Queen Street will provide dedicated heavy-vehicle access to back-of-house areas in the northern portion of the site, including the loading dock, waste collection areas, and ambulance drop-off;
- Direct access from Blayney Ambulance Station for ambulances will be maintained, albeit in a one-way inbound direction;
- Pedestrian access from Osman Street will be consolidated into a single, widened pathway providing direct access to the main hospital entrance.
- The TPDDR undertook an assessment of the proposed re-development, and noted the following key points:
- The re-development would result in improved vehicle access:
 - Short and long-term parking locations are intuitive and within line-of-sight of the main building entrance;
 - Entry and exits are widened with reduced potential for conflict;



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traffic, transport and parking impacts during the construction stages of the project, especially while the health service remains operational. The CTMP shall include aspects such as:

- The type of construction vehicles anticipated on site;
 - Construction transport routes;
 - Dilapidation surveys;
 - The preparation of a Traffic Control Plan (TCP). This shall be prepared in accordance with the requirements of the *Traffic Control at Worksites Manual* (RTA 2010 V4) and AS1742.3. Licensed traffic controllers shall assist with traffic control during the construction phase of the project;
 - The preparation of an Access Management Plan (AMP). This shall be prepared to manage internal site traffic and pedestrian movements to ensure the safety of workers and public within the site;
 - Notification requirements – traffic delay notifications shall be issued to Council at least two weeks prior to commencement of works requiring full or partial road closure. Neighbouring residents and property owners are to be informed in writing at least two weeks prior with respect to any changes to pedestrian movements and parking restrictions associated with the development; and
 - The installation of appropriate temporary signage.
- A mirror/s shall be installed adjacent to the internal roadway to assist with sightlines around parked trucks utilising the loading docks; and to increase awareness of arriving / departing ambulances utilising the ambulance bay when viewed from the access road west of the bay, as outlined within the *Traffic and Parking Design Development Report* (SCT Consulting, 2023).
 - Use of the internal access road between the patient-facing areas (in the southern portion of the site) and the service / logistical areas (in the northern portion of the site) shall be restricted to service vehicles and ambulances only. Signage shall be installed to advise road users to this effect.
 - An approval under s138 of the *Roads Act* shall be obtained from Blayney Council for any works within Council's road reserve, including the payment of fees and bonds. These works include driveway construction, road reserve occupancy and road reserve opening/excavation.

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)?	✓	
Will any receivers be affected by noise for greater than three weeks?	✓	
Are there sensitive land uses or areas that may be affected by noise from the proposal during operation?	✓	
Will the works be undertaken outside of standard working hours?		✓
Monday – Friday: 7am to 6pm		
Saturday: 8am to 1pm		
Sunday and public holidays: no work		
Will the works result in vibration being experienced by any surrounding properties or infrastructure?	✓	

Existing Environment

The site is situated within an established low-density residential neighbourhood. Surrounding development includes dwelling houses, an Ambulance Station, and a residential aged care facility. The closest residential development comprises 2 dwelling houses in close proximity to the site's northern boundary, at No. 7 Queen Street and No. 5 Osman Street, Blayney.

The existing Blayney MPS facility operates 24 hours a day, 7 days per week, and has operated as such for many decades. Operation during night times is generally restricted to acceptance of emergency patients and supervision / care of in-patients and aged care facility residents.

In order to gain an understanding of the existing noise environment, background noise monitoring was undertaken as part of a *Noise and Vibration Impact Assessment* (NVIA) – see **Appendix 23** of this REF. Two unattended noise monitors were established at the boundaries of the site, as indicated in **Figure 18** below, and supported by attended noise monitors at selected times. The unattended noise monitors recorded ambient noise data over an approximately 2-week period in mid-late January 2023.

Collection of the ambient noise data allowed for the establishment of NPI Rating Background Noise Levels for nearby sensitive receivers for the day, evening and night periods, as indicated in Table 3 of the NVIA. The site investigation also concluded that the major external noise source around the site is associated with traffic movements on the adjoining Mid-Western Highway (Martha Street).

In addition, the NVIA reviewed the existing vibration environment in the vicinity of the site. It found that, during the site inspection, no perceptible levels of vibration were identified, including from the Mid-Western Highway and as such the site is not considered to be impacted by vibration.



Figure 18: Sensitive Receiver and Noise Monitoring Locations

Impact Assessment

External noise impacts on site users

The background noise assessment carried out as part of the NVIA allowed for the establishment of Internal Noise Level Criteria for residents and users of the proposed MPS facility. In order to ensure that noise from external sources

does not unreasonably impact users of the facility (e.g. patients in bedrooms), the NVIA provided a number of recommendations with regard to construction specifications, as referenced in the 'mitigation measures' section below.

Construction noise impacts on surrounding sensitive receivers

The *Preliminary Construction Management Plan* (PCMP) prepared for the Activity (see **Appendix 14**) notes that construction works are anticipated to occur within standard working hours. The only exceptions to this may be the delivery / removal of heavy machinery to minimise impacts on other road users; works which may require services isolations which may impact hospital operations; and removal of hazardous materials deemed beneficial to complete outside normal working hours for safety purposes. The PCMP estimates the main works construction program will extend over a period of approximately 21 months.

The NVIA describes construction noise emission goals for nearby sensitive receivers within Table 8 of the NVIA. It notes that the noise impact from construction works on nearby development will be dependent on the activity in question and its location within the site. A review of the sound power levels of the loudest plant and equipment likely to be used at various times indicates that residential development to the north, east and west is likely to be at or above the 'highly noise affected level' for typically loud construction activities e.g. excavation, piling and hammering works. Residents to the south, on the southern side of the highway, would also be affected but to a lesser extent due to the separation distance and with reference to the elevated background noise levels from the highway.

The NVIA recommends that construction noise management processes be implemented for the project once the type and duration of specific construction processes are known. Recommended mitigation measures to this effect are provided in the 'Mitigation Measures' section below.

Operational noise impacts on surrounding sensitive receivers

In order to assess the operational impacts of the proposed Activity on surrounding sensitive receivers, the NVIA established EPA NPI Noise Emission Criteria, based on relevant intrusiveness, project amenity and sleep arousal criteria. This resulted in the establishment of project noise trigger levels for the project, in relation to identified sensitive receivers for the day, evening and night period, as outlined in Table 6-4 of the NVIA.

The NVIA identified the following potential noise impacts associated with the operation of the proposed re-developed MPS facility:

- Usage of the on-grade carparks;
- Delivery truck movements and associated operation of the loading dock; and
- Indicative mechanical plant operation.

The NVIA found that use of the proposed new carpark (adjacent to the existing Osman Street carpark) would alter existing noise levels by less than 2dB(A), which represents a negligible increase. Further, the proposed covered fleet vehicle parking area and workshop / shed near the site's northern boundary will provide noise separation for both vehicle entry and carparking activities on the site, and will minimise noise to surrounding residents. No further upgrades to these structures for acoustic purposes were recommended.

The NVIA provided a review of indicative mechanical plant items, and found that compliance with EPA acoustic criteria will be achievable provided that detailed acoustic review of plant items is undertaken once plant is selected, and standard acoustic treatments are adopted.

Vibration impacts on surrounding sensitive receivers

The NVIA notes that the primary sources of vibration during the demolition / construction phase of development would be during demolition works (e.g. from excavator mounted hammering) and any in-ground works. Depending on the specific methodology ultimately selected by the demolition contractor, these activities may have the potential to approach recommended vibration limits. Accordingly, the NVIA provides recommended mitigation measures, as outlined in the following section.

The NVIA found that typical hospital operational activities would present a negligible source of vibration, although mechanical plant (e.g. larger ventilation fans) have a potential to generate higher levels of vibration. Recommendations are provided in the following section to mitigate impacts from vibration.

Conclusion

In conclusion, the NVIA found that, on implementation of the recommended mitigation measures, the Activity is able to achieve all relevant acoustic (noise and vibration) requirements of the relevant guidelines.

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to noise and vibration:

- A detailed Construction Noise and Vibration Management Plan (CNVMP) shall be prepared by a qualified acoustic consultant to further assess the noise impact of construction works. The CNVMP should include protocols to minimise any potential noise impacts to identified sensitive receivers, and to ensure that appropriate noise control measures are defined and implemented to comply with all relevant noise guidelines. The CNVMP should consider inclusion of the following mitigation measures where practicable:
 - Selection of construction equipment and processes which minimise acoustic impact. For example, internal strip out (where needed) behind a closed façade will significantly reduce noise impact to neighbouring properties during these works;
 - Community interaction and notification. Notification of construction works both before and during construction will enable nearby residents to plan for acoustic impacts associated with the development;
 - Where possible, machinery should be located as far as practicable from neighbouring residents (i.e. towards the southern portion of the site);
 - Deliveries and access to the site should be managed so that it does not unreasonably disturb neighbouring residents. Loading areas should be located away from nearby residents where possible;
 - During the demolition / construction phases, the use of quieter methodologies shall be adopted wherever practical. Works shall be conducted initially using excavator with bucket or claw (lowest impact method, as opposed to hydraulic hammers and rock saws) where feasible. Use of the loudest equipment (hydraulic hammers / rock saws) is to used only where other options are not available;
 - Careless dropping of construction materials should be avoided;
 - Schedule activities sensitively to minimise impacts on neighbours e.g. plan noisy activities to coincide with periods of higher neighbourhood daytime noise to reduce noise intrusiveness impacts.
- Window and door specifications shall comply with the recommendations in Section 5.4.1 of the *Noise and Vibration Impact Assessment* (Acoustic Logic, 2023).
- Roof and ceiling construction specifications shall be in accordance with the recommendations in Section 5.4.2 of the *Noise and Vibration Impact Assessment* (Acoustic Logic, 2023).
- External wall construction specifications shall be in accordance with the recommendations in Section 5.4.3 of the *Noise and Vibration Impact Assessment* (Acoustic Logic, 2023).
- Ventilation and air conditioning design shall be undertaken in accordance with the recommendations in Section 5.4.4 of the *Noise and Vibration Impact Assessment* (Acoustic Logic, 2023).
- Prior to installation, proposed plant items shall be reviewed for acoustic appropriateness by a qualified acoustic consultant. Any recommended acoustic treatments shall be adopted.
- Routine deliveries to the site shall be scheduled between the hours of 7am and 10pm, to minimise the potential for sleep disturbance impacts to surrounding residents.
- In the event of vibration complaint, sample measurements of typical construction activities shall be undertaken to determine the source, and any potential impact. Where warranted, long term vibration monitoring may be required.

- All proposed mechanical plant shall be appropriately vibration isolated to ensure relevant requirements are achieved. This should be achieved via the methods outlined within Section 8.3.1.2 of the *Noise and Vibration Impact Assessment* (Acoustic Logic, 2023).

6.2.3 Air Quality and Energy

Questions to consider	Yes	No
Could the works result in dust generation?	✓	
Could the works generate odours (during construction or operation)	✓	
Will the works involve the use of fuel-driven heavy machinery or equipment?	✓	
Are the works located in an area or adjacent to land uses (e.g. schools, nursing homes) that may be highly sensitive to dust, odours, or emissions?	✓	

Existing Environment

The site and surrounding area is predominantly zoned R1 General Residential. Surrounding land uses are generally low-density urban (i.e., detached dwelling houses) and open space, with nearby more intensive uses including an Ambulance Station and Residential Aged Care Facility (RAC). The Blayney Sewerage Treatment Plant is over 750m distant from the site. The site fronts the Mid Western Highway to the south.

Local air quality would be considered generally good. Potential sources of air quality impacts within the locality are likely to be associated with vehicle emissions; and potential odours associated with the kitchens and laundry facilities within the existing MPS and nearby RAC.

Impact Assessment

Construction Phase

During the construction phase, the Activity has the potential to generate air quality impacts through:

- Earthworks, resulting in dust generation;
- Machinery and construction vehicle use, resulting in exhaust emissions; and
- High winds, which may blow material from the site.

Further, the Activity would contribute to greenhouse gas emissions to a minor extent via the emissions from construction equipment and traffic, as well as the consumption of materials requiring carbon emissions.

The Activity is likely to require only limited earthworks, and these will be staged so that large expanses of earth will not be exposed for extended periods. Accordingly, while some dust generation is likely, this would be minimal and limited to the immediate vicinity of the work area. With the implementation of appropriate safeguards and mitigation measures, dust generation impacts would be minimised. Similarly, the implementation of appropriate mitigation measures, as set out in the following section, would assist in ameliorating impacts from wind-blown material or exhaust emissions.

Operational Phase

The operation of the re-developed MPS would result in some additional vehicle movements. However the *Traffic and Parking Design Development Report* prepared for the proposal determined that additional traffic movements are unlikely to be significantly different from the existing scenario (i.e. approximately 12 additional trips during peak hour – see **Appendix 22**). Therefore additional vehicular traffic is unlikely to affect local air quality.

The re-developed MPS facility would include an on-site commercial kitchen, small server kitchen and small laundry facility, with the potential to generate odours and other air quality impacts. However, the following factors indicate these impacts would be negligible:

- The Mechanical Services design complies with *BCA 2022 Part F6* and in particular the Deemed to Satisfy requirements of *F6D6 'Ventilation of rooms'* and *F6D12 'Kitchen local exhaust ventilation'*. F6D6 requires

mechanical ventilation to comply with AS 1668.2-2012 and AS/NZS 3666.1-2011. F6D12 requires the commercial kitchen to comply with AS 1668.1:2015 and AS 1668.2-2012.

- The commercial kitchen is positioned within a 'back-of-house' area, well away from patient or RAC resident rooms. The ventilation and exhaust systems are designed and documented to comply with *BCA 2022* clause F6D12 and the referenced Australian standards. Design finalisation of the systems will include any adjustments to suit final kitchen design.
- The small servery kitchen (within the RAC) is not a commercial kitchen. The proposed fitout includes a domestic range hood that will be ducted to the outside.
- The laundry, associated with the RAC, is small and intended to house only 2 washing machines and dryers. It will be served by a dedicated ducted exhaust system (160 L/s) and ducted discharges from the two driers, through the external wall. Although not considered a commercial laundry, it will achieve a commercial exhaust air rate of 15 L/s/sq.m with the general exhaust and one drier operating.
- Outdoor air ventilation flow rates and exhaust air flow rates comply with *NSW Health Engineering Services Guide 2022* except for patient corridors which have offsetting design benefits that exceed normal hospital central air handling systems.

The new building will feature a new 150kW rooftop solar photovoltaic system to augment the facility's electrical power supply. New fixtures and fittings would meet relevant energy efficiency standards and benefit emission reduction and energy efficiency. Electric vehicle charging stations will be available to service facility fleet vehicles.

The building façade will be designed to exceed the Section J deemed-to-satisfy requirements to meet Ecologically Sustainable Development initiatives with insulation in the walls and roofs. Thermal bridging and air tightness will be taken into consideration to ensure thermal performance is maintained.

As discussed in **Section 3.1.2** of this REF, the Activity is targeting 50 points under the *ESD Design Guidance Note No. 058 Performance Specification* rating tool. A pathway has been developed identifying credits to be targeted to meet this rating. These targets include features that measure and reduce energy consumption.

The Activity would contribute to greenhouse gas emissions to a minor extent via the emissions from construction equipment and traffic, as well as the consumption of materials requiring carbon emissions. Given the scale of the works, the influence on greenhouse gas emissions would be minor. However, it is appropriate to implement measures that can reduce or minimise such effects, as outlined in the *ESD DGN 058 Performance Specification* at **Appendix 7** and the section below.

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to air quality and energy:

- An Air Quality Management Plan (AQMP) shall be prepared by the Contractor before the commencement of construction or demolition. The AQMP should consider inclusion of the following mitigation measures where practicable:
 - Vehicles transporting soil or other materials which may produce dust shall be covered during transportation.
 - Vehicles, machinery and equipment shall be maintained in accordance with manufacturer's specifications in order to meet the requirements of the *Protection of the Environment Operations Act 1997* and associated regulations.
 - Vehicle wash down areas shall be established to ensure mud and soil from construction areas are not carried onto public roads.
 - Spraying of paint and other materials with the potential to become air borne particulates shall only be undertaken on days with still or light wind conditions.
 - Vehicles, machinery and equipment shall be switched off when not in operation.

- Debris and waste shall be immediately collected into appropriate storage facilities and removed from the site as soon as practical to ensure light-weight material is not dispersed by wind gusts.
- Stockpiles and exposed soils shall be covered or dampened to reduce incidence of air dispersal.
- Exposed areas are to be progressively revegetated as soon as practical.
- New fixtures and fittings throughout the MPS shall meet relevant energy efficiency standards.
- No materials shall be burnt on site.
- Before construction, the Contractor shall review the final design to ensure the required sustainability initiatives set out in the *ESD DGN 058 Performance Specification* (LCI Consultants, 18/08/2023) are incorporated into the overall design and construction of the project.

6.2.4 Soils and Geology

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

Existing Environment

Regional geological information indicates that the site is underlain by the Wombiana Formation Shale, generally comprising siltstone and limestone. It is located with the Vittoria-Blayney soil landscape, as indicated in **Figure 19** below. This is a *residual landscape which experiences typical depths consisting of up to 1.1m and has a low to moderate erosion potential* (p12, **Appendix 17**). The site is not mapped as being within an Acid Sulphate Soil risk area.

The site is positioned within a gently undulating area, which slopes towards the east and north at about 3°. The land sits approximately 2m lower than the street level along the Martha Street frontage, with a batter slope (varying between 10° and 15°) extending downwards into the site from the street. The slope is vegetated with trees and shrubs, and shows no signs of instability.

A *Geotechnical Investigation* (GI) prepared for the site (**Appendix 24**) involved the drilling of a number of boreholes. The boreholes disclosed a generalised profile of fill overlying predominantly residual silty clay, with occasional layers of clayey silt. The fill extended to depths ranging from 0.3m to 1.2m below existing surface level, and included matter such as gravels, brick and concrete fragments, root fibres, slag and ash. It appeared to range from poorly to well compacted.

Groundwater depth measured across the boreholes ranged from 0.81m below ground level, to 4.38m below ground level.

Selected soil samples were analysed in laboratories for features such as moisture content, linear shrinkage and resistivity testing. Results indicated the residual silty soils are of low to medium plasticity. The four-day soaked CBR (California Bearing Ratio) tests on samples of the residual clay (compacted to 98% of their Standard Maximum Dry Density) returned CBR values between 5% and 9% for the residual clays. Additional test result details, and soil chemistry values, are presented within the GI.

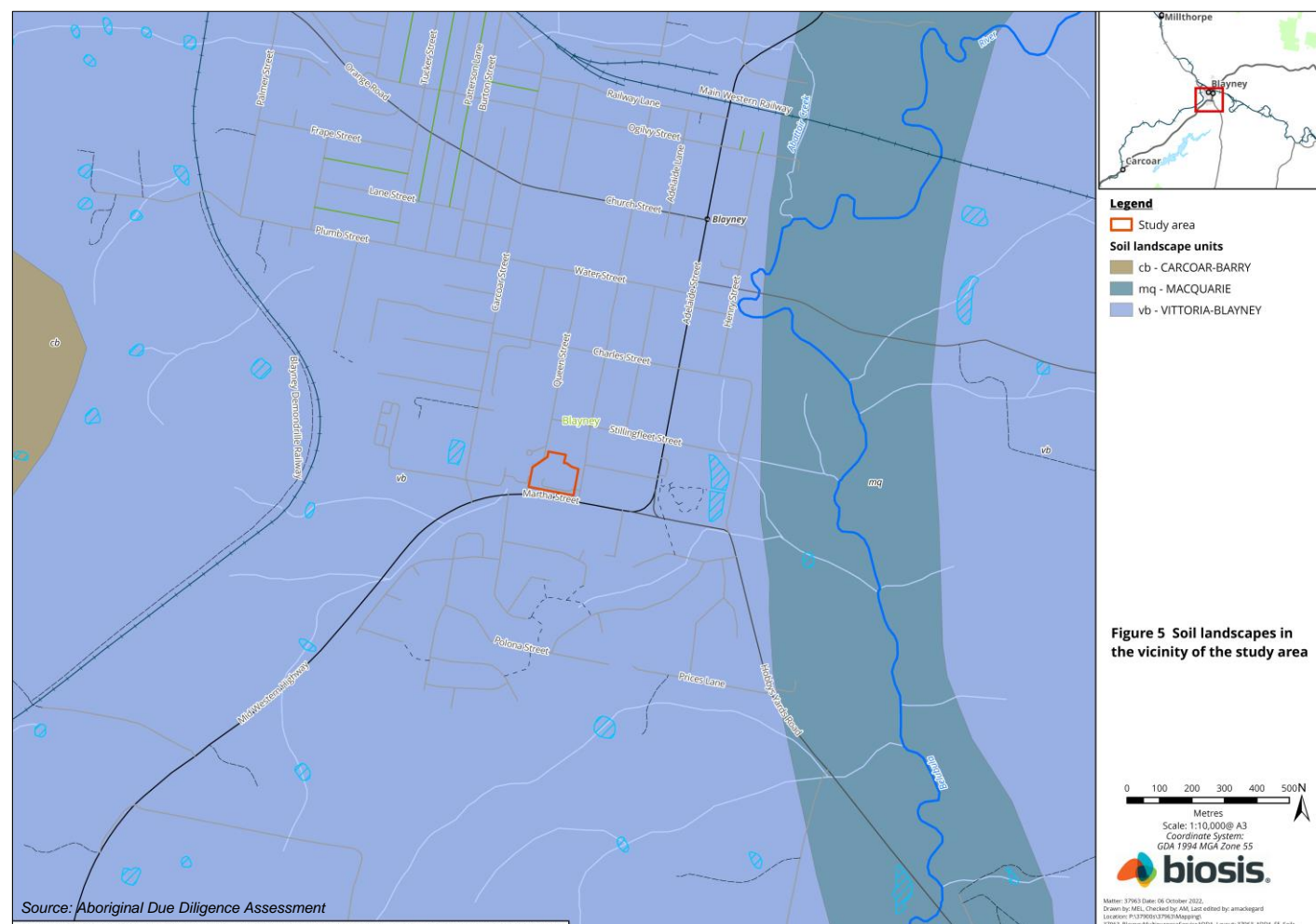


Figure 19: Soil landscape map

Impact Assessment

Based on the results of the above-mentioned investigations, the GI made a number of detailed recommendations with regard to:

- Site preparation - including the potential to re-use excavated soil on-site, the early removal of trees where necessary, and excavation mechanisms;
- Footings – including the classification of the site as Class ‘P’ in accordance with *AS2870-2011 ‘Residential Slabs and Footings*, the appropriateness of various footing types; and subgrade preparations;
- Earthquake design classification – i.e. Hazard Factor (X) = 0.08 and Class C_e - Shallow Soil Site;
- Retaining walls – including batter slope gradients and retaining wall design;
- Subgrade preparation – including use of engineered fill; and
- Pavement design parameters.

It also recommended additional geotechnical input into the design and construction phases, including additional geotechnical investigation (if required), review of structural drawings, inspection of footings excavations and proof rolling soil subgrade, and testing of engineered fill.

The above recommendations shall be incorporated into the detailed design and construction phase of the Activity.

Further, detailed erosion and sediment control plans have been developed to encompass the 3 proposed construction stages. The control measures that will be put in place include barrier fences, sediment fences, catch drains, gravel filters, and an area for the stockpile. These strategies will help mitigate and prevent soil erosion during construction and other sediments from the construction site washing into gutters, drains, and waterways. Details of the proposed erosion and sediment control plans are provided in the *Civil Design Report* at **Appendix 5**.

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to soils and geology:

- The recommendations within the *Geotechnical Investigation* (JK Geotechnics, 02/02/23) shall be implemented during the detailed design and construction phase, as appropriate.
- Appropriate sediment and erosion controls shall be implemented throughout all stages of construction, as detailed within the *Civil Design Report* (Jacobs, 10/08/2023) and accompanying plans.
- Earthworks shall not commence until all required sediment and erosion controls have been established. The controls shall be maintained in place until works are complete, and all exposed erodible materials are stable.
- Erosion and sedimentation controls shall be checked and maintained (including clearing of sediment from behind barriers) on a regular basis, including after any precipitation events. Records of maintenance shall be kept.
- All sediment control measures shall be checked and repaired or re-installed (as required) if heavy rainfall is forecast.
- Any imported fill materials shall be certified as clean fill from an approved site.

6.2.5 Hydrology, Flooding and Water Quality

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

Existing Environment

Blayney township sits in the Belubula River valley, part of the larger Lachlan River basin. The town generally drains from west to east. There are no natural drainage lines or watercourses within or near the site. The closest surface water body to the site is an unnamed tributary of the Belubula River located approximately 440m to the north-east of the site. The Belubula River proper (with a catchment size of approximately 120km², predominantly upstream of the town) is located approximately 795m to the north-east – refer to **Figure 20** below.

The nearest registered bore in proximity to the site was located approximately 215m to the south, and was used for domestic and stock water supply purposes. A number of boreholes were sunk within the site as part of the *Detailed (Stage 2) Site Investigation* – see **Appendix 25**. It found that standing water levels of groundwater ranged from around 2.48m below ground level to 4.28m below ground level.

Groundwater was found to flow generally towards the north-east. A number of groundwater contaminants, above target levels, were identified within groundwater within the site – contamination matters are addressed further within **Section 6.2.13** of this REF.

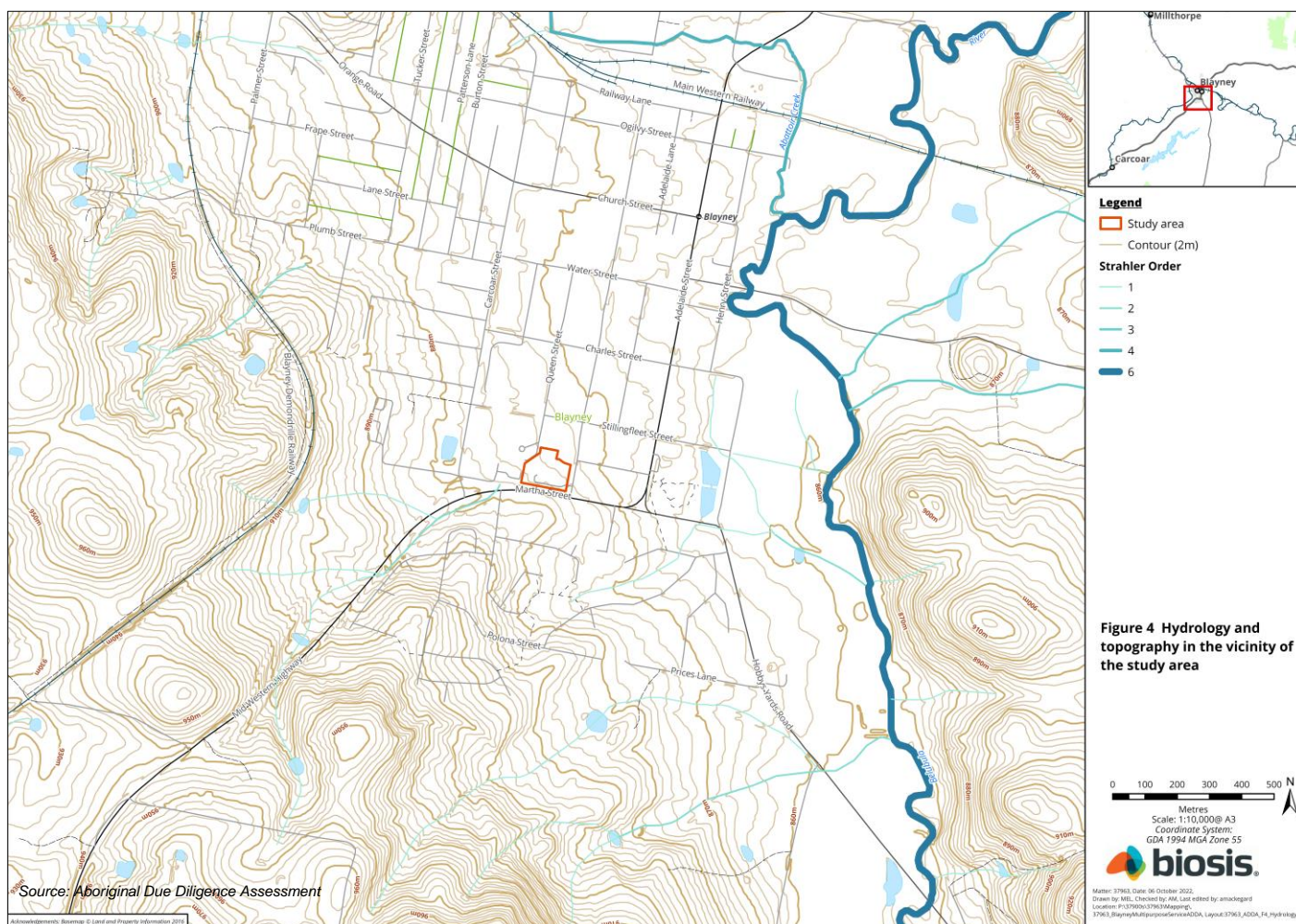


Figure 20: Hydrology and topography within the vicinity of the site

The site currently has 3 existing stormwater drainage sub-catchments, which discharge to 3 existing Council-operated discharge points. Two of the discharge points are in Osman Street and one discharge point is in Queen Street – refer to **Figure 21** below. Stormwater drainage from the Osman Street and Queen Street drainage systems is then conveyed via the existing drainage pit and pipe systems to Stillingfleet Street's drainage systems. Stillingfleet Street's systems then discharge into a wetland at the intersection of Stillingfleet Street and Lower Farm Street for detention and treatment before ultimately discharging to Belubula River.

With regard to flooding, the *Section 10.7 Planning Certificate* (see **Appendix 1**) states the land is not within the flood planning area and is not subject to flood related development controls.

The *Addendum to Blayney Floodplain Risk Management Study* (Storm, 2022) presents the latest flood hazard mapping for the Blayney area, prepared on behalf of Blayney Shire Council. This Addendum included flood hazard mapping which accounted for runoff from the anticipated future developed state of Blayney, based on proposed developments at the time of writing (not including the current MPS proposal).

A review of this flood hazard mapping indicated that the subject site (in its current state of development) is wholly unaffected by the 20% Annual Exceedance Probability (AEP) design flood event, however it is slightly impacted by the 5% AEP and 1% AEP events. In addition, a *Flooding - Technical Memorandum*¹ prepared by GHD (see **Appendix 26**)

¹ Note for clarification purposes – the GHD document also examined the feasibility of constructing a potential flood levee / wall around the site, to mitigate anticipated PMF flooding impacts on the proposed development. However, while modelling of this measure found it would assist in the reduction of flooding impacts to the site, it was also determined to unreasonably increase offsite impacts to adjacent properties, including the Lee Roshana Aged Care Facility. Accordingly, construction of the wall was determined to be inappropriate and does not form part of this proposal.

included flood modelling for Probable Maximum Flood (PMF) design flood events (the largest flood that could conceivably be expected to occur at a particular location) in relation to the subject site.



Figure 21: Existing hydrological subcatchments and stormwater discharge points

In summary, and specific to the site:

- **5% AEP Event:** As indicated in **Figure 22** below, very small and isolated areas of the site, particularly in the north-western corner, may be affected by floodwaters during the 5% AEP event. This flood hazard appears to be restricted to Hazard Vulnerability Classification H1, described as *generally safe for vehicles, people and buildings*.
- **1% AEP Event:** As indicated in **Figure 23** below, slightly more extensive areas of the site, again predominantly within the north-western corner, may be affected by floodwaters during the 1% AEP event.

This flood hazard appears to be predominantly restricted to Hazard Vulnerability Classification H1, with some negligibly-small areas classed as H2, defined as *unsafe for small vehicles*.

- **PMF Event:** The *Technical Memorandum* noted that the subject site is expected to be inundated due to overland flooding during PMF design flood events. A large overland flow contributes to the site from upstream on the western side. A maximum flood depth of up to 0.63 metres has been modelled to occur on the northern and northwestern side of the site adjacent to Queen Street. Maximum flood depth in the southwestern side of the site is calculated to be up to 0.55 metres adjacent to Martha Street. No flood hazard mapping for the PMF event was provided, however the anticipated flood depth and extent within the site is shown in **Figure 24** below.

Additional details on anticipated flood depths and velocities, as well as modelling and mapping assumptions, are provided within the above-referenced documents.

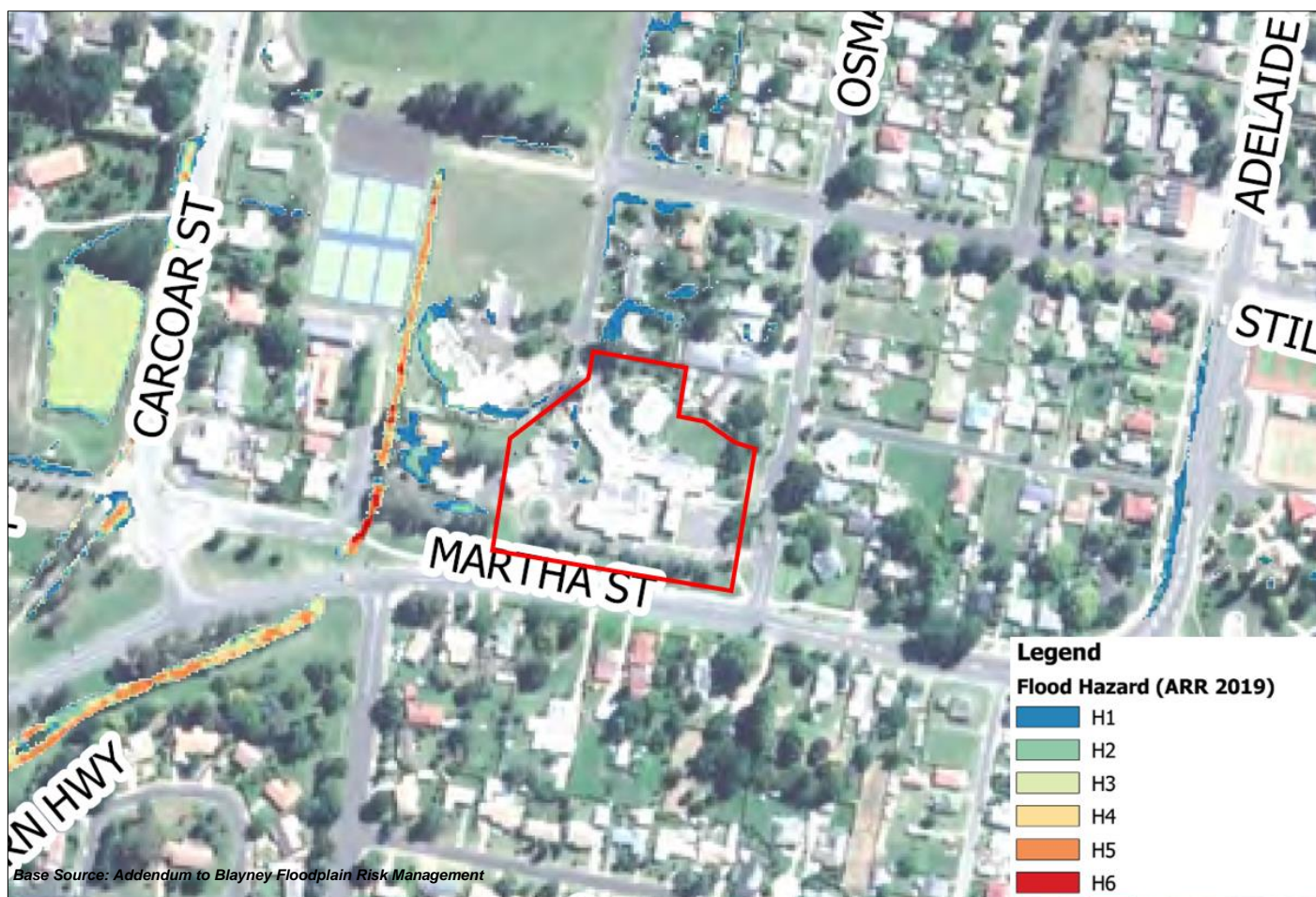


Figure 22: Proposed (without basins) flood hazard 5% AEP Event – existing scenario

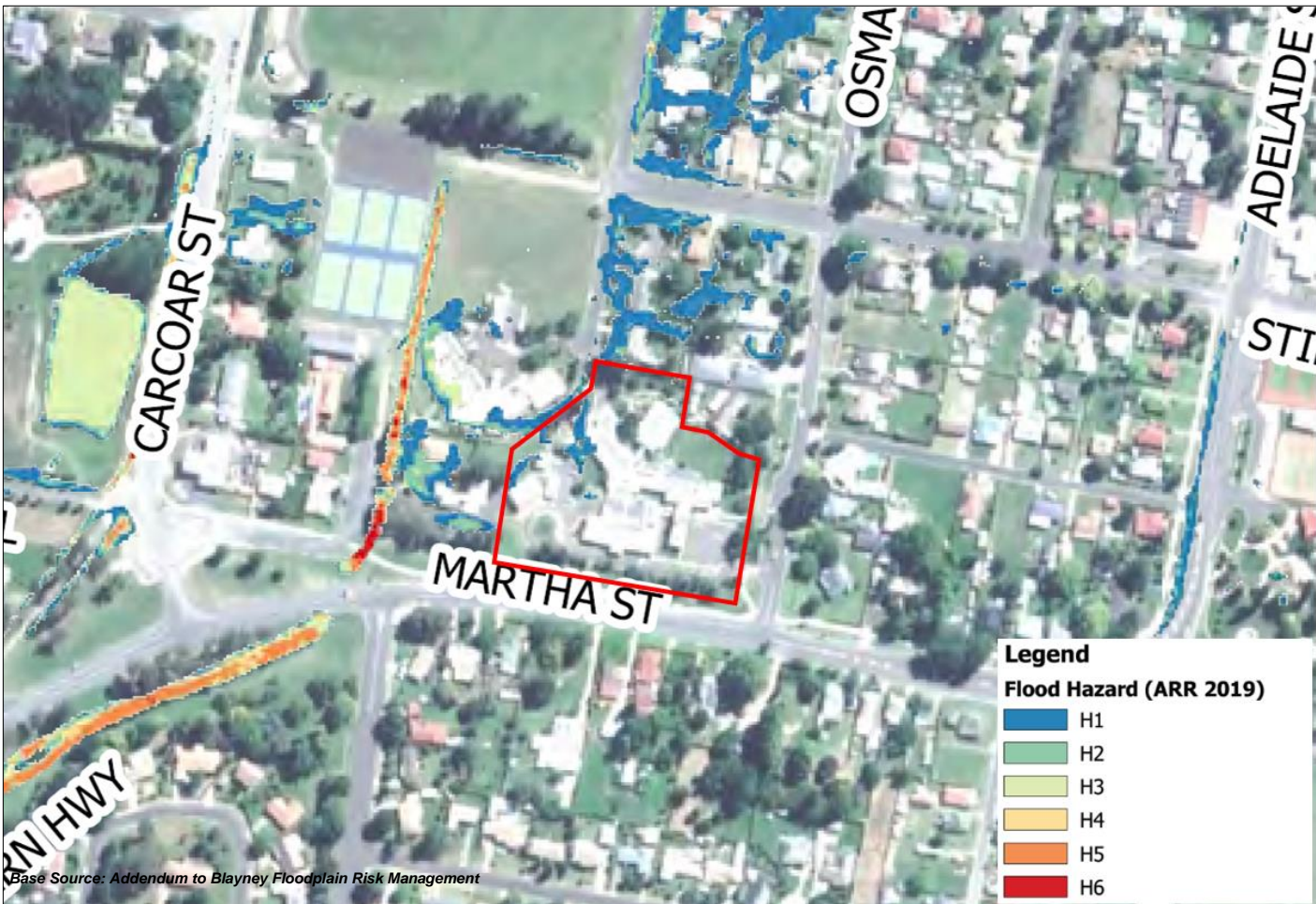


Figure 23: Proposed (without basins) flood hazard 1% AEP Event– existing scenario

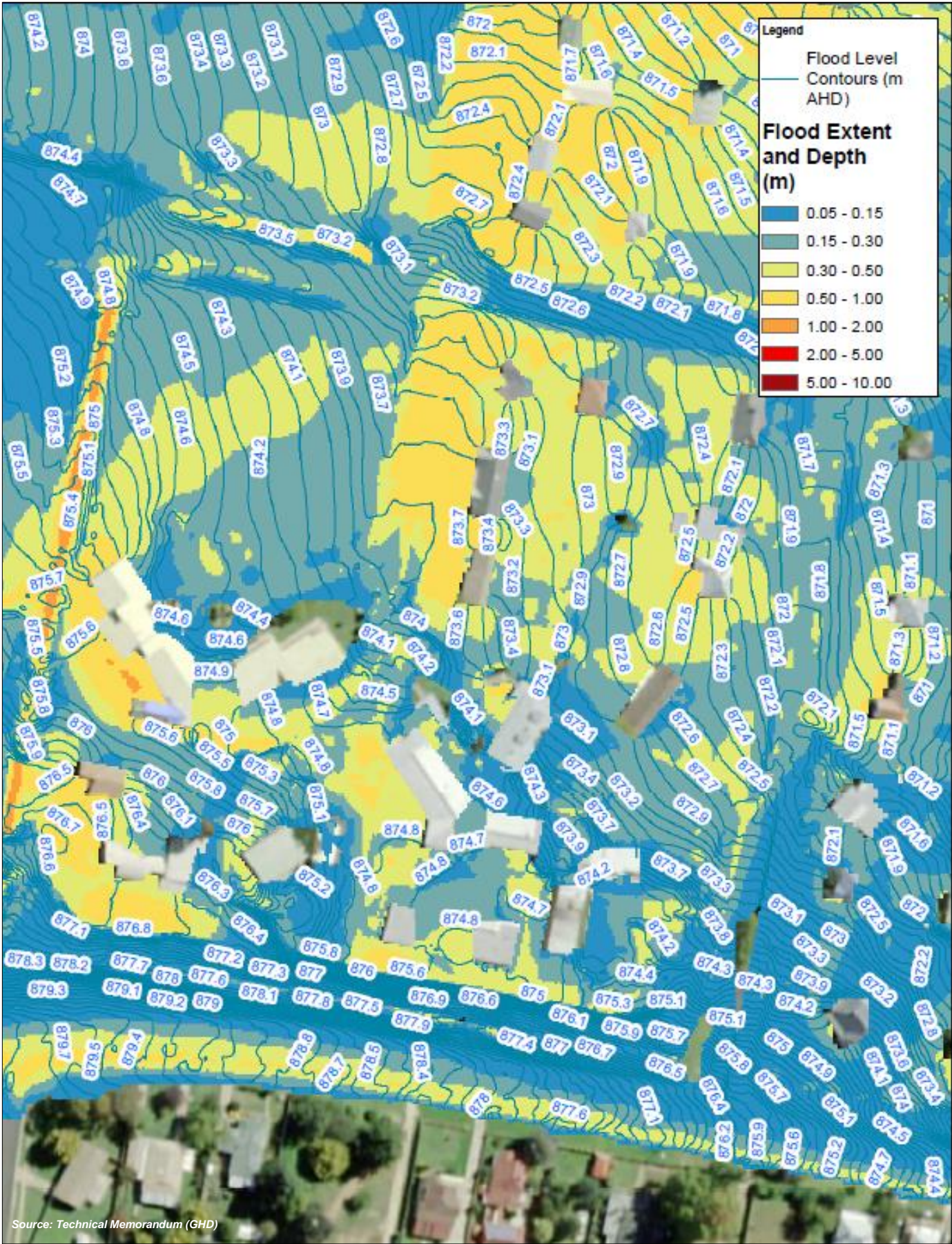


Figure 24: Existing condition PMF Flood Extent and Depth affecting the site

Impact Assessment

With regard to groundwater, the *Geotechnical Investigation* at **Appendix 24** made recommendations for detailed design and construction which take into account the potential for groundwater impacts associated with construction. For example, the pouring of a binding layer in the base of footings is proposed to reduce the risk of soil softening associated with groundwater. In this regard, there are not anticipated to be any unreasonable impacts associated with groundwater.

Further, the *Detailed (Stage 2) Site Investigation* (**Appendix 25**) noted that where (i.e. if) temporary construction dewatering is required, it is expected that the management of such water would occur in accordance with the regulatory requirements so that no unacceptable construction-phase risks occur. For the avoidance of doubt, potential risks associated with existing groundwater contamination at the site were considered to be low in the context of the proposed development and are not indicative of site contamination that warrants remediation – refer to **Section 6.2.13** of this REF for further discussion on contamination matters.

With regard to stormwater management, the proposed stormwater management regime is presented within the *Civil Design Report* at **Appendix 5**. The development will utilise the existing Council-owned stormwater drainage systems to carry runoff from the site to the existing wetlands at the corner of Stillingfleet Street and Lower Farm Street for detention and water quality treatment. The proposed drainage strategy is to install raingardens in the proposed carpark area of the site to treat runoff (from carpark only) and to provide two 10,000L rainwater tanks for stormwater harvesting and irrigation reuse of landscape areas. The provision of rainwater tanks and raingarden/biorention trench for the new carpark endeavours to enhance the use of water sensitive urban design elements and reduce pollutant loads carried by the stormwater runoff from the site to the existing wetlands.

An extract plan of the proposed stormwater treatment works is provided at **Figure 25** below.

With regard to flooding, the anticipated 1% AEP flood levels and depths within the site (in its current state of development) are shown in **Figure 26** below.

The development is proposed to be constructed so that finished floor levels of the building will be at least at the 1% AEP flood level plus 500mm freeboard. This will result in the following finished building levels:

- Residential aged care (RAC) wing: RL 874.65m AHD
- Health One wing: RL 874.20m AHD

The existing ground levels are shown in the *Site Survey* at **Appendix 12**. **Figure 10** within this REF illustrates the proposed cut and fill plan for bulk earthworks (see **Section 3.1.2**). The *Civil Design Report* at **Appendix 5** presents proposed cut and fill volumes for bulk earthworks, which estimate a net cut volume of around 162m³ for the overall site.

On 1 March 2024, the NSW Government released *Planning Circular PS 24-001, Update on addressing flood risk in planning decisions*. It recommended that planning authorities apply a risk-based approach to the assessment of flood-affected proposals, which should take into account the flood risk profile of each proposal including the flood characteristics for the location, the nature and type of development and any impacts on the existing community and surrounding properties. The Circular included a number of matters which should be taken into consideration in assessing such proposals. A preliminary assessment of the proposal against these matters is provided in **Table 16** below.

Based on the available information, it is considered that the proposal is capable of adequately addressing flooding hazards within the site, provided appropriate mitigation measures are put in place, as outlined in the following Section.

Table 16: Flood risk assessment – matters for consideration

Matters for Consideration	Response
Whether the proposal is in a high-risk catchment	The site is not within one of the identified high-risk catchments (listed as the Northern Rivers, Hawkesbury-Nepean, Georges, Tweed, Macleay, Richmond, Hunter, Clarence and Shoalhaven catchments).

Base Source: Civil Design Report

Matters for Consideration	Response
<p>The location of the proposal in relation to flood behaviour and constraints including:</p> <ul style="list-style-type: none"> • floodway, flood storage area or flood fringe area • the hazard vulnerability classification of the land • frequency of inundation 	<p>As outlined in the Section above, the site (in its current state of development) is anticipated to be unaffected by flooding during the 20% AEP flood event. It is anticipated to be affected by minor, isolated areas of flooding during the 5% AEP and 1% AEP events. The site is anticipated to be mostly inundated during the very rare PMF flood event, with varying depths up to a maximum of 0.63m.</p> <p>Flooding up to and including the 1% AEP event is anticipated to be predominantly Hazard Vulnerability Classification H1, identified as <i>generally safe for vehicles, people and buildings</i>. Only negligible areas are likely to reach Hazard Vulnerability Classification H2 (i.e. <i>unsafe for small vehicles</i>).</p> <p>It is not known if the site is within a <i>floodway, flood storage area or flood fringe area</i>. The flood behaviour of the site in response to the proposed development, including applicable Hazard Vulnerability Classifications, has not been modelled. Additional site-specific assessment of flood behaviour is proposed to be undertaken prior to construction, to inform a proposed <i>Site Flood Emergency Response Plan</i> – see the 'Mitigation Measures' section below.</p>
<p>Whether the proposal provides for safe occupation and efficient and effective evacuation in flood events and how it is to be achieved</p>	<p>It is proposed that the development be constructed with finished surface levels at least at the 1% AEP flood level plus 500mm freeboard. This will ensure safe occupation of the development in all flood events up to the 1% AEP flood event. With reference to Figure 26, it is anticipated that flood-free egress from the site will be achievable via the proposed Osman Street driveways in all flood events up to and including the 1% AEP event.</p> <p>In the very rare case of flood events more extreme than the 1% AEP event (e.g. the PMF) it is proposed that appropriate flood response actions (e.g. evacuation or shelter-in-place) are explored and detailed within a proposed <i>Site Flood Emergency Response Plan</i> – see the 'Mitigation Measures' section below.</p>
<p>In high-risk catchments, whether the proposal is likely to result in a significant increase to the risk to life in other parts of the catchment in a PMF flood event.</p>	<p>N/A</p>
<p>Any known evacuation constraints such as the flood emergency response classification for the area and available warning times (including rate of rise and when the evacuation route is cut off by floodwater).</p>	<p>It is not known if the site is affected by specific evacuation constraints. The potential for such constraints should be confirmed and accounted for within a forthcoming <i>Site Flood Emergency Response Plan</i>.</p>
<p>Whether the proposal is for a sensitive or hazardous land use, or other higher risk uses and what mitigation strategies (if any) are proposed to reduce any identified risks</p>	<p>The proposal includes <i>sensitive and hazardous development</i> i.e. 'hospitals' and 'seniors housing'. In order to reduce identified risks, the proposal will be constructed with finished floor levels at least at the 1% AEP flood level plus 500mm freeboard, with flood-free egress available away from the site in an easterly direction via Osman Street up to and including the 1% AEP event.</p> <p>A <i>Site Flood Emergency Response Plan</i> is proposed to further quantify site-specific risks and mitigation measures to ensure the safety of patients, staff and visitors during a flood event.</p>
<p>Whether there may be adverse flooding impacts on surrounding properties</p>	<p>The proposed earthworks are anticipated to result in a net cut volume of around 162m² across the overall site (see the <i>Civil Design Report</i> at Appendix 5). Accordingly, there is not anticipated to be any net filling of the site which would result in increases in off-site flooding impacts.</p> <p>Regardless, it is proposed that potential off-site flooding impacts are investigated further as part of a future detailed flood risk assessment which takes into account the proposed development layout, forming part of a forthcoming <i>Site Flood Emergency Response Plan</i>.</p>
<p>Potential impacts of cut and fill and other building works on flood behaviour.</p>	<p>See above.</p>
<p>Ability of proposed development to withstand flood impacts.</p>	<p>It is anticipated that the forthcoming <i>Site Flood Emergency Response Plan</i> will detail appropriate construction standards in response to site-specific flooding constraints – see the 'Mitigation Measures' section below.</p>

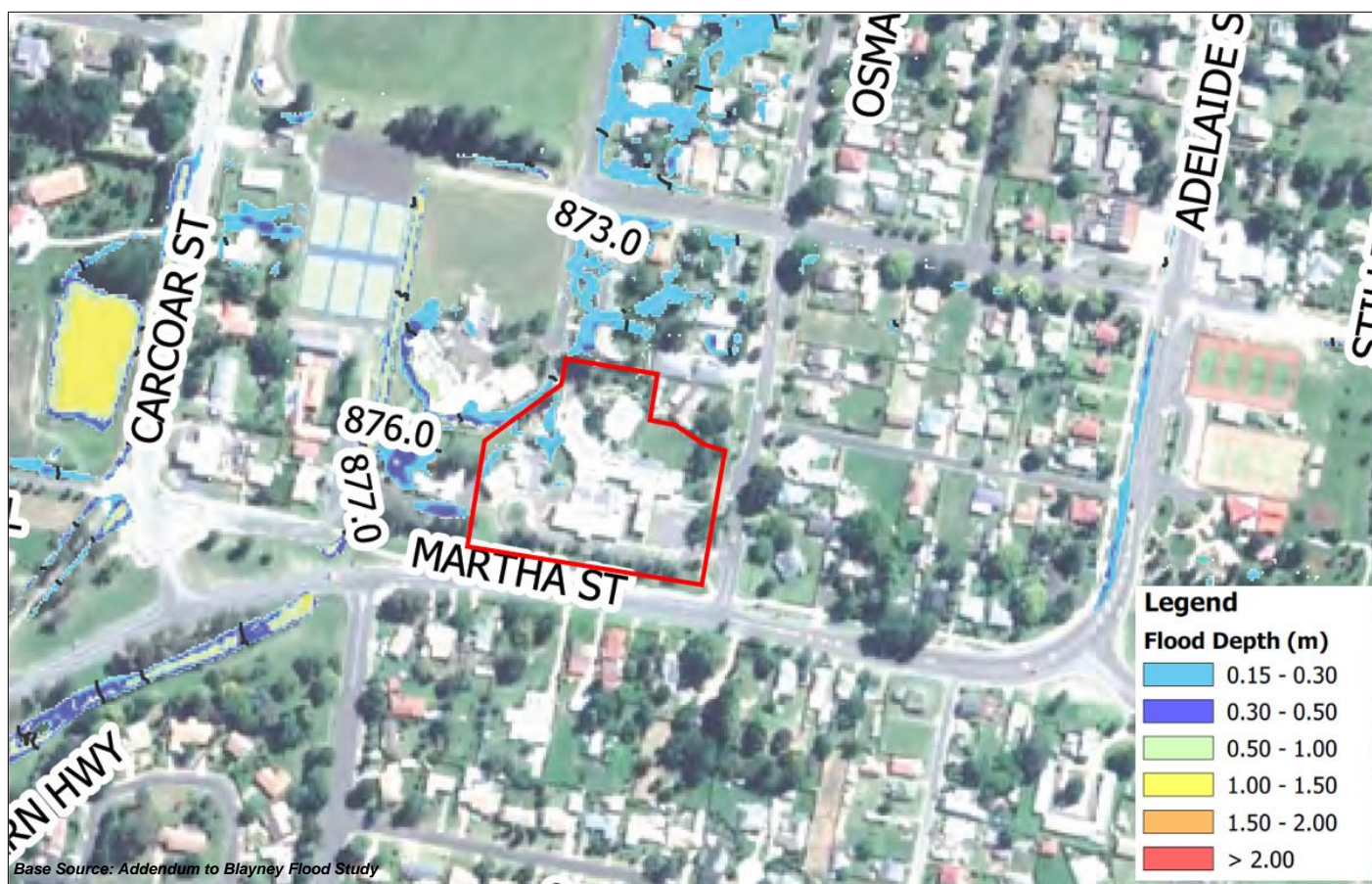


Figure 26: Proposed (without basins) Flood Depth and Level 1% AEP Event

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to hydrology, flooding and water quality:

- The recommendations within the Civil Design Report (Jacobs, 29/05/24) shall be implemented during the detailed design, construction and operational phases, as appropriate.
- The recommendations within the Geotechnical Investigation (JK Geotechnics, 02/02/23) shall be implemented during the detailed design and construction phases, as appropriate.
- Prior to the commencement of building construction (excluding site establishment, demolition and earthworks), a Flood Risk Assessment (FRA) shall be prepared by a suitably qualified engineer. The FRA shall include the following:
 - Identify / confirm any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the *Flood Risk Management Manual: the management of flood liable land* (2023);
 - Undertake an assessment of the proposal in accordance with the Flood Impact and Risk Assessment – *Flood Risk Management Guide LU01* (2023). It shall include assessment of any off-site impacts of development, including potential impacts on the neighbouring Lee Roshana Aged Care Facility. The assessment shall encompass consideration of matters including but not limited to the:
 - (i) anticipated intensity, flood level and hazards associated with various flooding events;
 - (ii) anticipated duration of flood events;
 - (iii) structural capacity of proposed buildings to withstand floodwater loads and currents; and

- (iv) potential for environmental pollution from the development in association with flooding.
- Identify any specific detailed design solutions and operational measures to mitigate flood risk where required, including:
 - (i) minimum floor levels for essential plant, clinical facilities and utility connection points;
 - (ii) appropriate building construction standards including the use of flood compatible building components and the maintenance of structural integrity both during and after a PMF flood event;
 - (iii) consideration of appropriate flood response actions for site attendees during flood events (including vulnerable persons) such as shelter-in-place or evacuation, consideration of potential impacts of site isolation including loss of power, consideration of any evacuation issues during the full range of anticipated flood events, and a decision matrix regarding site evacuation triggers, routes and destinations, as appropriate.
- Prior to the commencement of building construction (excluding site establishment, demolition and earthworks), a Site Flood Emergency Response Plan (SFERP) shall be prepared by a suitably qualified engineer. The SFERP shall be informed by the FRA, and shall have regard to the existing protocols within the Blayney Health Service Emergency Management Plan and Standing Operating Procedures (Western NSW Local Health District), and the Blayney Shire Flood Emergency Sub Plan (NSW State Emergency Services, 2024). The SFERP shall include, but not be limited to, the following details:
 - Predicted flood levels;
 - Anticipated flood warning time, including identification of warning signals and the potential use of flood detection devices;
 - Flood notification procedures for all possible site attendees;
 - Identification of assembly points and evacuation routes;
 - Evacuation and refuge protocols, including relocation of deceased persons;
 - Asset protection protocols, including protection of confidential or important documentation and potentially toxic or polluting substances;
 - Awareness training for employees, contractors, patients, residents, visitors and other site users; and
 - Identification of appropriate flood emergency responses for all construction phases of the development;
- Prior to the commencement of the relevant construction stage, the Construction Manager shall obtain evidence from a suitably qualified engineer that the relevant design and construction recommendations of the SFERP will be met.
- Prior to occupation, the Blayney Health Service Emergency Management Plan and Standing Operating Procedures shall be updated to incorporate any recommendations with regard to operational flooding response actions outlined within the Site Flood Emergency Response Plan.

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?	✓	
Will the works be visible from the public domain?	✓	
Are the works located in areas of high scenic value?		✓
Will the works involve night work requiring lighting?		✓

Existing Environment

The site is situated within an established low-density residential neighbourhood. Surrounding residential development predominantly comprises single-storey, older-style, low-density residential dwelling houses, with the exception of the nearby Ambulance Station and Lee Roshana Aged Care Facility. Existing gardens and street trees in the vicinity of the site (many of them exotic), along with deep, landscaped street setbacks to homes assist in establishing a 'leafy', suburban character to the area.

The site sits approximately 2m lower than the street level along the Martha Street frontage, with a batter slope extending downwards into the site from the street. The slope is vegetated with trees and shrubs so views into the site from this frontage are obscured. The site sits approximately level with Osman Street, although views into the site are partially obscured by the presence of large trees along the Osman Street boundary. **Figure 27** and **Figure 28** below shows views into the site from surrounding streets.

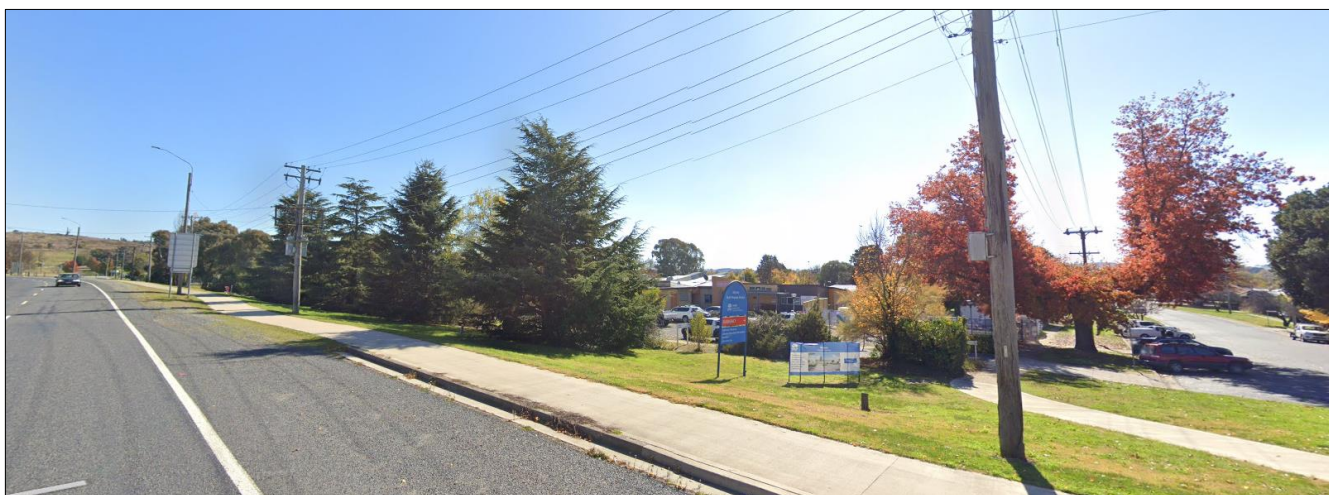


Figure 27: View towards site from Martha Street, looking north-west



Figure 28: View towards site from Osman Street, looking north-west

Impact Assessment

During construction, there will be negative impacts on visual amenity within the site, and as viewed from the public domain. The establishment of site hoardings, fencing and safety barriers will assist in screening and softening views of works areas from public / internal areas throughout this temporary phase (approximately 21 months).

The proposed re-developed MPS facility has been designed to respond to the site context and constraints of existing development. The MPS design incorporates attractive materiality, building form, landscaping (both hardscape and planting palette) and other features to maximise visual amenity for site users.

A number of factors ensure that the proposal would not have a detrimental impact on visual amenity from the public domain, including the following:

- Restricting building height to a single storey;
- Retention of the existing vegetative screening along Martha Street. Combined with the ground-level height differential between the site and adjacent street, the development would be almost fully screened from public view in this location (as discussed below);
- The significant setback of the buildings from the Osman Street (approximately 40m) ensures the development will not have an overbearing visual impact on the streetscape;
- The retention of a significant street tree on Osman Street will ensure continued partial screening of the site from the eastern boundary;
- The proposed landscaping regime will complement the streetscape and enhance views into the site.

A *View Analysis* is contained within the *REF Report and Design Statement* at **Appendix 3**. It tests a key viewpoint into the site, as indicated in **Figure 29** below, which is positioned between 2 local heritage items (dwelling houses). It found that the proposed building would be predominantly screened from view (refer to **Figure 30** below), and the overall visual impact of the proposal would be 'low'.



Figure 29: Viewpoint analysis location



Figure 30: View from No. 22 Martha Street looking north-west towards site, with extent of proposed built form shown as red dashed line

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to visual amenity:

- The construction worksite shall be maintained, kept free of rubbish and cleaned up at the end of each workday.

6.2.7 Aboriginal Heritage

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

Questions to consider	Yes	No
<ul style="list-style-type: none"> 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?	n/a	
If the above steps indicate that there remains a risk of harm or disturbance, has a desktop assessment and visual inspection been undertaken?	n/a	
Is the activity likely to affect wild resources or access to these resources, which are used or valued by the Aboriginal community?		✓
Is the activity likely to affect the cultural value or significance of the site? (See Note 16)		✓

Existing Environment

The traditional landowners of the Blayney area are the Wiradjuri people. The Orange Local Aboriginal Land Council administers relevant matters within the local area.

An *Aboriginal Due Diligence Assessment (ADDA)* was prepared in relation to the site and proposed Activity – see **Appendix 17**. It provided a detailed discussion on the landscape context of the local area, including the geology, soil and landforms, as well as the regional context. Key features which may affect the archaeological potential of the site include the following:

- Topographically, the site is situated in a gently north-eastward sloping landform, indicating the site is likely to possess archaeological sensitivity;
- No watercourses are present within the site, although a second order non-perennial water course is located approximately 65m south;
- The site is located within the Vittoria-Blayney soil landscape.

An extensive search of the AHIMS database identified 96 Aboriginal Archaeological sites within a 20km search area, mostly comprising artefacts. However, no registered sites were located within the site, nor in close proximity to the site.

Impact Assessment

Based on background information presented within the report, the ADDA developed a series of predictive statements to broadly predict the type and character of Aboriginal cultural heritage sites likely to exist within the site, and their likely location. The statements suggested there was a 'Nil' potential for some site types (e.g. rock shelters) through to 'Moderate' potential for one (i.e. flaked stone artefacts). Most site types had a 'Low' potential to occur (e.g. shell middens, modified trees).

Subsequently, an archaeological survey of the site was undertaken to identify any Aboriginal archaeological sites or areas of cultural sensitivity. This visual assessment was necessarily constrained in many areas by the presence of extensive ground cover (e.g. grass, buildings, carparks). The assessment noted that the entire site had been subjected to high levels of disturbance associated with its history as a hospital site, including complete clearing of large native vegetation; the stripping and grading of topsoil; and large-scale excavation, cutting and benching of the landscape. All of these activities would have resulted in the mass movement of soils and the likely removal of any intact sub-surface deposits or surface artefacts.

The survey did not identify any Aboriginal sites or objects within the site. The ADDA concluded that, due to:

- the likelihood that limited to no intact soil deposits remain;
- the absence of Aboriginal sites identified within the site during the background research or archaeological survey; and
- the absence of highly favourable landscape features

the site has been determined to contain low archaeological potential – see **Figure 31** below. Accordingly, the ADDA recommended that no further archaeological investigation is required and works can proceed, subject to the implementation of appropriate unexpected finds procedures (see the following section).



Figure 31: Aboriginal archaeological survey effort and results

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to Aboriginal heritage:

- All Aboriginal objects and Places are protected under the *National Parks and Wildlife Act 1974*. It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object, the archaeologist will provide further recommendations. These may include notifying the Heritage NSW and Aboriginal stakeholders.
- Aboriginal ancestral remains may be found in a variety of landscapes in NSW. If any suspected human remains are discovered during any activity, you must:
 - Immediately cease all work at that location and not further move or disturb the remains.
 - Notify the NSW Police and Heritage NSW's Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
 - Not recommence work at that location unless authorised in writing by Heritage NSW.

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?		

Questions to consider	Yes	No
NSW heritage database (includes section 170 and local items)	✓	
Commonwealth EPBC heritage list?		✓
Will works occur in areas that may have archaeological remains?	✓	
Is the demolition of any heritage occurring?		✓

Existing Environment

The site is not listed as containing an item of heritage under the *Environment Protection and Biodiversity Conservation Act 1999*; the State Heritage Register or a Section 170 Register. It is not mapped as containing a heritage item under the Blayney LEP nor is it positioned within a heritage conservation area. However, there are a number of locally significant heritage items in the vicinity of the site – refer to **Figure 32** below.

A *Statement of Heritage Impact* (SoHI) prepared for the Activity (see **Appendix 18**) provides a detailed Non-Aboriginal history of the site and surrounding area (see **Section 6.2.7** above for discussion of Aboriginal heritage). Key aspects of this history are as follows:

- 1843: survey and gazettement of Blayney township;
- 1851 - 1882: Gold Rush and establishment of a railway led to an expansion of Blayney;
- 1886: land allocated for a hospital site;
- Late 1800s - early 1900s: fundraising undertaken by the local community to establish a hospital;
- 1910: Blayney Cottage Hospital opens on the site;
- 1912 - 1987: ongoing community fundraising continues, and various additions and modifications are made to the original hospital;
- 1988: original Blayney Hospital demolished to make way for the current MPS structure. No original structures or fabric remain;
- 1988 to date: several minor additions and modifications made to the current facility.

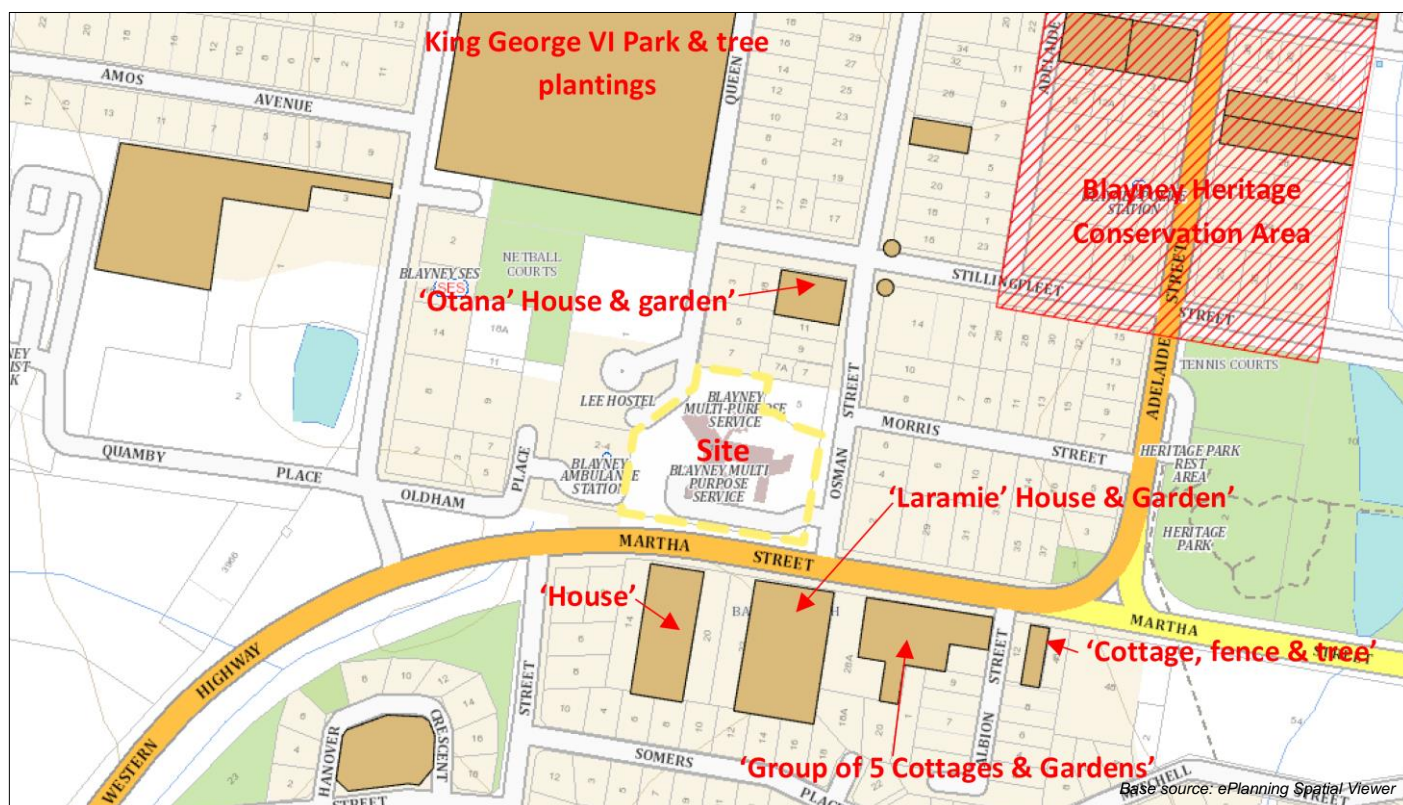


Figure 32: Heritage Map (annotated) – Blayney Local Environmental Plan 2012

Impact Assessment

The SoHI (**Appendix 18**) undertook a detailed assessment of the potential impacts of the Activity on aspects of Non-Aboriginal heritage.

With regard to the site and existing Blayney MPS facility, the SoHI found that the building does not strongly demonstrate any particular style or aesthetic character and can be considered an ordinary building of its time. There are no significant views to the place; and no element of the original cottage hospital has been retained, with the exception of a 1910 stone dedication tablet. Accordingly, the SoHI confirms the place has low historical integrity and is below the threshold for a heritage item on either a Local Environmental Plan or a Section 170 Heritage Conservation Register.

The history of the site presented in the SoHI indicated that the site was likely vacant prior to the establishment of the Blayney Cottage Hospital in 1910. An archaeological assessment of the site found it highly likely that the construction of the current buildings and infrastructure would have removed or significantly disturbed the archaeological resources of the original hospital buildings, resulting in low integrity of sub-surface deposits. Further, any archaeological resources of the original hospital buildings would be unlikely to provide further information regarding the early hospital site or other historical aspects. Accordingly, the SoHI concluded the entire site has low archaeological potential.

With regard to nearby heritage items, the SoHI confirms that the following 4 locally significant heritage items are considered to be in the vicinity of the site (refer to **Figure 32** above):

- 'House' – Blayney LEP Item I72, 18 Martha Street;
- 'Laramie House and Garden' – Blayney LEP Item I73, 24 Martha Street;
- 'Group of 5 Cottages and Gardens' – Blayney LEP Item I74, 30-40 Martha Street; and
- 'Otana' House and Garden – Blayney LEP Item I89, 15 Osman Street.

An assessment of these sites found that significant views to the heritage items do not cross the Blayney MPS site – see **Figure 33** below. Further, the heritage items are located at least 50m from the proposed MPS building and separated via roadways; steep, vegetated embankments; and / or existing houses. Views from the houses on Martha Street to and across the Blayney MPS site would differ little from current views due to the low scale of the proposed development and its ground level being significantly lower than the ground levels of the listed houses. There would be no change in views from the 'Otana' house to the north and east, although the proposed MPS building may be visible in the periphery of views to the house from the north-east. However, the distance from the site and separation via in-between houses would ensure the proposed development would not dominate, obscure or affect the setting of 'Otana'.

Further, the SoHI found that the Activity would not impact on the heritage significance of these items as:

- The impact of the proposed building has been minimised by retaining the general scale and siting of the existing MPS buildings;
- The nearby heritage items do not demonstrate a consistent and significant character and materiality to which the proposed development ought to respond. The design and materiality of the proposed building is appropriate for a new building on a site with no remnant, early or original significant structures;
- The public's and user's opportunities to view and appreciate the significance of the nearby heritage items will not change.

In conclusion, the SoHI found that there would be no direct impacts and negligible indirect impacts on nearby heritage items. The impact of the proposed development would be minor and acceptable. Moreover, the history and community driven development and use of the place for health services since the 19th century supports continued development on the site for those purposes.

Notwithstanding the above, the SoHI found that the site has some significance as an enduring part of community infrastructure realised and sustained by the Blayney community's efforts from the late 19th century. While this aspect of significance is obscure, the SoHI considered it deserves greater presentation to the users and public by way of heritage interpretation. Although not a statutory requirement, the SoHI recommended that interpretation should be informed by a Heritage Interpretation Strategy and Plan which would develop historical themes and audience and could be integrated to work with the Connecting with Country framework.

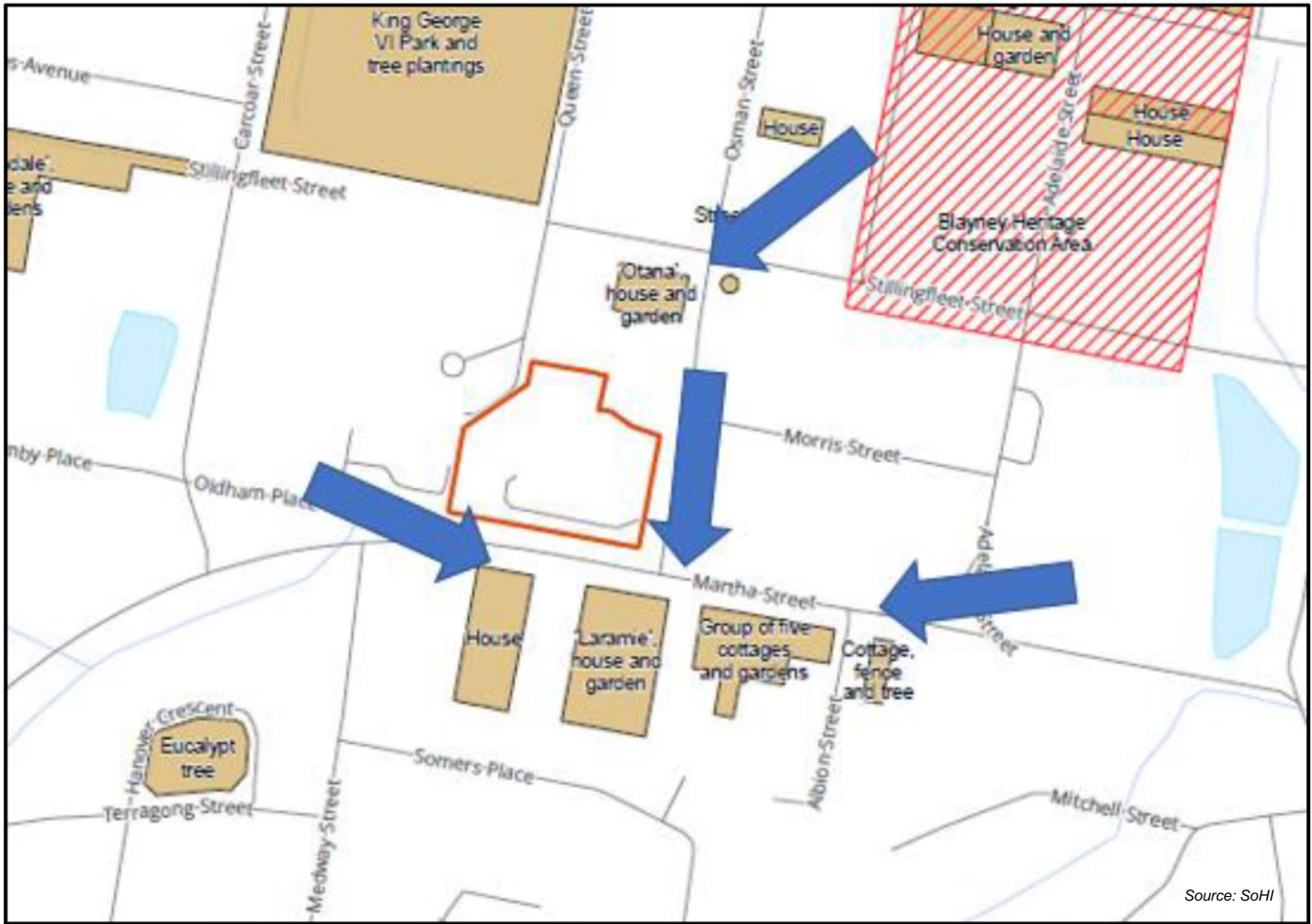


Figure 33: Views to nearby heritage items

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to Non-Aboriginal heritage:

- A Heritage Interpretation Strategy and Heritage Interpretation Plan should be developed prior to demolition, as outlined within the *Statement of Heritage Impact* (Biosis, 2022). This would include salvage and interpretation of fabric including the 1910 stone tablet and later plaques; as well as exploring ways to interpret significance through landscape design, potentially including salvage and replanting of transplantable plants.
- An unexpected finds procedure should be built into the detailed Construction Management Plan, and implemented during demolition / construction. This procedure should be as follows:
 - If any unexpected historical archaeological material is exposed during construction or earthworks, work should be stopped in line with the requirements of the *NSW Heritage Act 1977*. An appropriately qualified heritage professional and an archaeologist should be engaged to assess the finds and advise on their management.

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?		✓

Questions to consider	Yes	No
Is it likely that the activity will have a significant impact in accordance with the Biodiversity Conservation Act (2016)? In order to determine if there is a significant impact, the REF report must address the relevant requirements of Section 7.2 of the BC Act:		✓
<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?		✓
Is there any important vegetation or habitat (i.e. Biodiversity and Conservation SEPP) within or adjacent to the work area?		✓
Could the works impact on any aquatic flora or habitat (i.e. seagrasses, mangroves)?		✓
Are there any noxious or environmental weeds present within the work area?		✓
Will clearing of native vegetation be required?		✓

Existing Environment

The site is situated within an established residential area. It is located more than 750m from the closest mapped 'biodiversity values', comprising the riparian area of the Belubula River, as indicated in **Figure 34** below. An *EPBC Act Protected Matters Report* produced on 9 February 2023 (see **Appendix 15**) identified the following matters likely to occur within the search area (inclusive of a 1km buffer):

- 2 Critically Endangered ecological communities (*Natural Temperate Grassland of the South Eastern Highlands*, and *White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland*);
- 32 listed threatened species;
- 12 listed migratory species.

Further, the Report noted the proximity of wetlands of international importance (Ramsar wetlands) approximately 700 – 1,000km downstream.

The site itself has been significantly disturbed in the past, including via bulk earthworks, and has been maintained as hospital grounds for over 130 years. It contains a number of mature trees and garden plantings, particularly around the boundaries of the site. An *Arboricultural Impact Assessment* (AIA) prepared for the site (see **Appendix 10**) noted that the site is *highly disturbed with negligible understorey present* (p10).

A total of 60 trees were identified within and immediately adjacent to the site, most of which comprised exotic species planted for amenity value – a detailed Tree Assessment Schedule is available within the AIA at **Appendix 10**. Approximately 11 specimens are native, 8 of which are locally native (2 Red Stem Wattle, 1 Blakely's Red Gum and 5 Yellow Box trees). There are no trees identified as being of national, state or local heritage significance. Only 1 species (comprising 2 specimens) was identified as threatened, namely Narrow-leaved Peppermint (*Eucalyptus nicholii*), identified as 'Vulnerable' under NSW and Commonwealth threatened species legislation. However, this species is positioned outside of its natural range and the specimens have been planted within the batter slope adjacent to Martha Street.

An *Ecological Assessment* (EA) prepared for the site included the undertaking of flora and fauna surveys (see **Appendix 16**). These surveys found no evidence of nests or tree hollows within the site, nor threatened flora or fauna species. The site lacks habitat features such as rocky surfaces, ground timber or caves, thereby limiting habitat available for native fauna species. The grassland present within the site is non-native and has low conservation value. The EA found the site had only low potential for threatened species to occur, with the exception of a low-moderate potential for the Grey-headed Flying-fox to occur. However, no roosting habitat for the Flying-fox occurs within the site.

The site is not positioned adjacent to any areas of bushland or significant vegetation which may provide any significant habitat corridor functions.

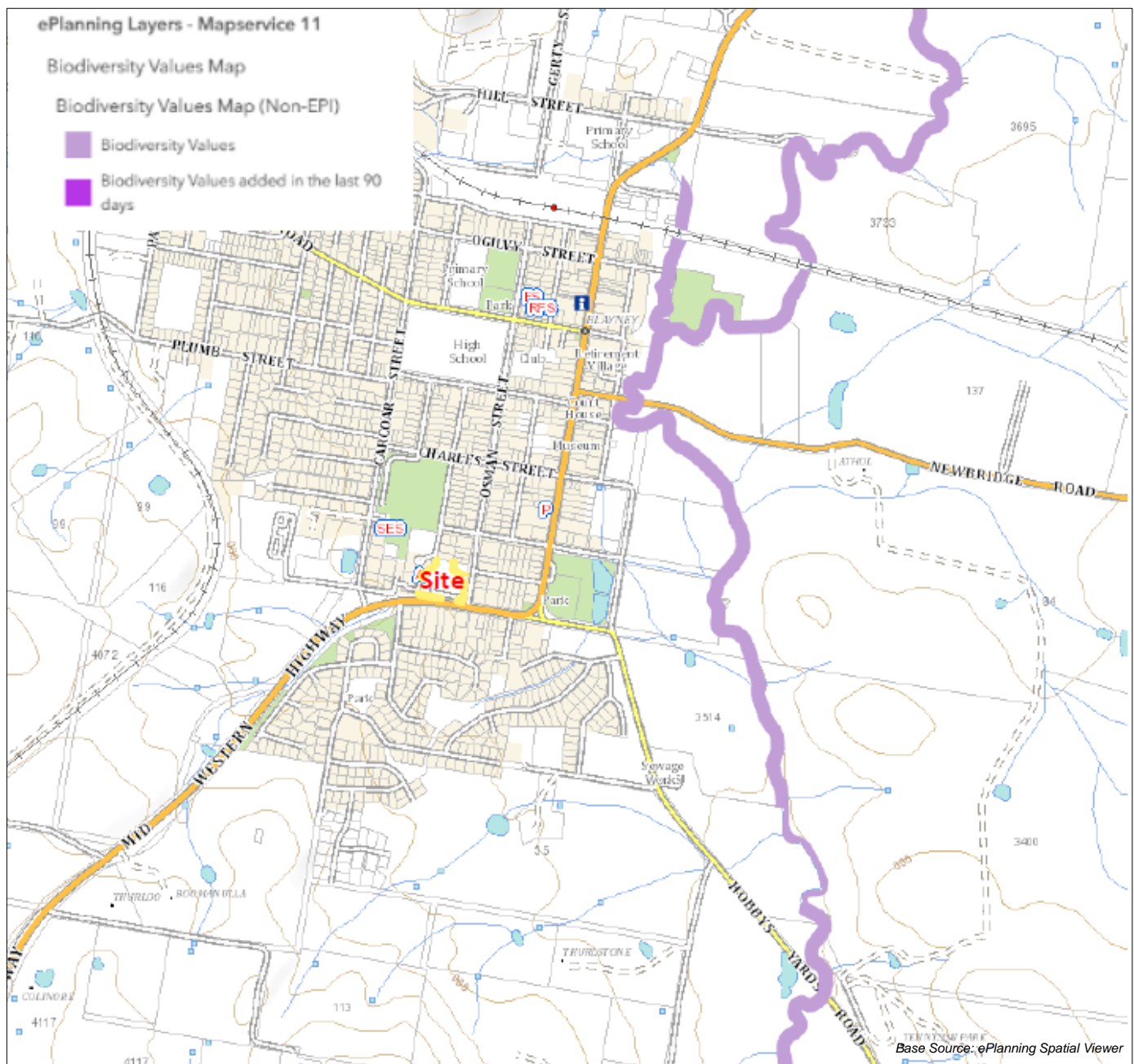


Figure 34: Biodiversity Values Map

Impact Assessment

To facilitate the proposed Activity, the AIA recommended the removal of a total of 27 tree specimens, approximately 45% of the existing trees within and directly adjacent to the site. The trees were recommended for removal due to incursion from the proposed roadway and grass swale; and their position within areas proposed for drainage lines, buildings, pathways, roadways, sprinkler tanks and pump, and carparking areas. At the time of writing of the AIA, 2 native trees were proposed for removal, comprising 2 'Yellow Box' trees (*Eucalyptus melliodora*).

The EA prepared for the proposal noted the proposed removal of 1 'Yellow Box' tree and 1 *Eucalyptus* sp. tree were not considered to have a significant ecological impact given these trees are isolated and surrounded by residential development. The removal of these trees will not sever any potential vegetation corridors within the area. No areas of habitat would become fragmented or isolated by the proposal (p40). It further found that no threatened species or Endangered Ecological Communities were likely to be impacted, due to the minor nature of the proposal.

Since the AIA and EA were drafted, additional design changes have resulted in amendments to the proposed tree removal / retention strategy outlined within the AIA. Trees now proposed to be removed and retained are identified in the *Tree Management Plan* at **Figure 35** below, within **Appendix 4 (Landscape Plans)**, and described in **Table 17** below. The total number of trees to be removed has been reduced to 25, approximately 41% of the existing number (although this number is to be confirmed via additional arborist review, as outlined in the following section). The Activity no longer proposes the removal of native tree species; only planted, exotic garden species.



Source: Landscape Plans

Figure 35: Tree Management Plan

The AIA provided recommendations for the protection and management of the trees recommended for retention within the site. These include specific tree protection measures during construction works; root sensitive excavation; and the engagement of a supervising arborist.

In addition to the retention of all native trees within the site, the proposed landscaping regime includes the planting of an additional 32 tree specimens throughout the site, all comprising various species of *Eucalyptus*, as demonstrated within the *Landscaping Plans* at **Appendix 4**. These trees will provide potential feed and habitat resources for native fauna species.

Considering the above, the Activity is unlikely to have a significant impact on any threatened species or communities listed under the BC Act, EPBC Act or FM Act.

Table 17: Proposed Tree Removal and Retention

	Tree ID Number*	Total Trees	% of Total Trees
Trees proposed for retention	1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 25, 26, 27, 29, 34, 35, 36, 37, 38, 49, 50, 51, 52, 57	34	57%
Trees proposed for removal	7, 8, 23, 24, 28, 30, 31, 32, 33, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 53, 54, 55, 56, 58, 60	25	41%
Trees proposed for transplantation	59	1	2%
Total trees (onsite and adjacent to boundaries)		60	-

*see AIA

With regard to potential impacts on water quality, a number of stormwater management measures are proposed to manage the quantity and quality of stormwater leaving the site, as outlined in **Section 6.2.5** of this REF. Considering the distance from areas of identified high value (i.e. 750m from the Belubula River and over 700km from Ramsar Wetlands), and the proposed stormwater management measures, the Activity is not likely to have any detrimental impacts on water quality.

Mitigation Measures

The following mitigation measures would be implemented to manage potential impacts relating to ecology:

- Before demolition commences, the proposed *Tree Management Plan* forming part of the Landscape Plans (NBRS, 2023) shall be reviewed by a qualified arborist to ensure the updated tree retention / removal strategy is viable. This review should have regard to matters such as likely development incursions into Tree Protection Zones and Structural Root Zones, and other relevant matters, and may include updated advice and recommendations for tree removal or retention methodologies.
- Work related to tree retention or removal should be undertaken generally in accordance with the recommendations of the *Arboricultural Impact Assessment* (Creative Planning Solutions, 2023), except as updated by the *Tree Management Plan* and updated arborist review outlined above.
- Landscaping shall be provided in accordance with the *Landscape Plans* (NBRS, 2023), inclusive of the proposed tree planting schedule.

6.2.10 Bushfire

Questions to consider	Yes	No
Are the works located on bushfire prone land?		✓
Do the works include bushfire hazard reduction work?		✓
Is the work consistent with a bush fire risk management plan within the meaning of the <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?		N/A

Existing Environment

The site is situated within an established town location, with no significant stands of forest in proximity. The site is not mapped as bushfire prone land, as indicated in **Figure 36** below. The nearest bushfire prone land is approximately 2km south-west of the site.

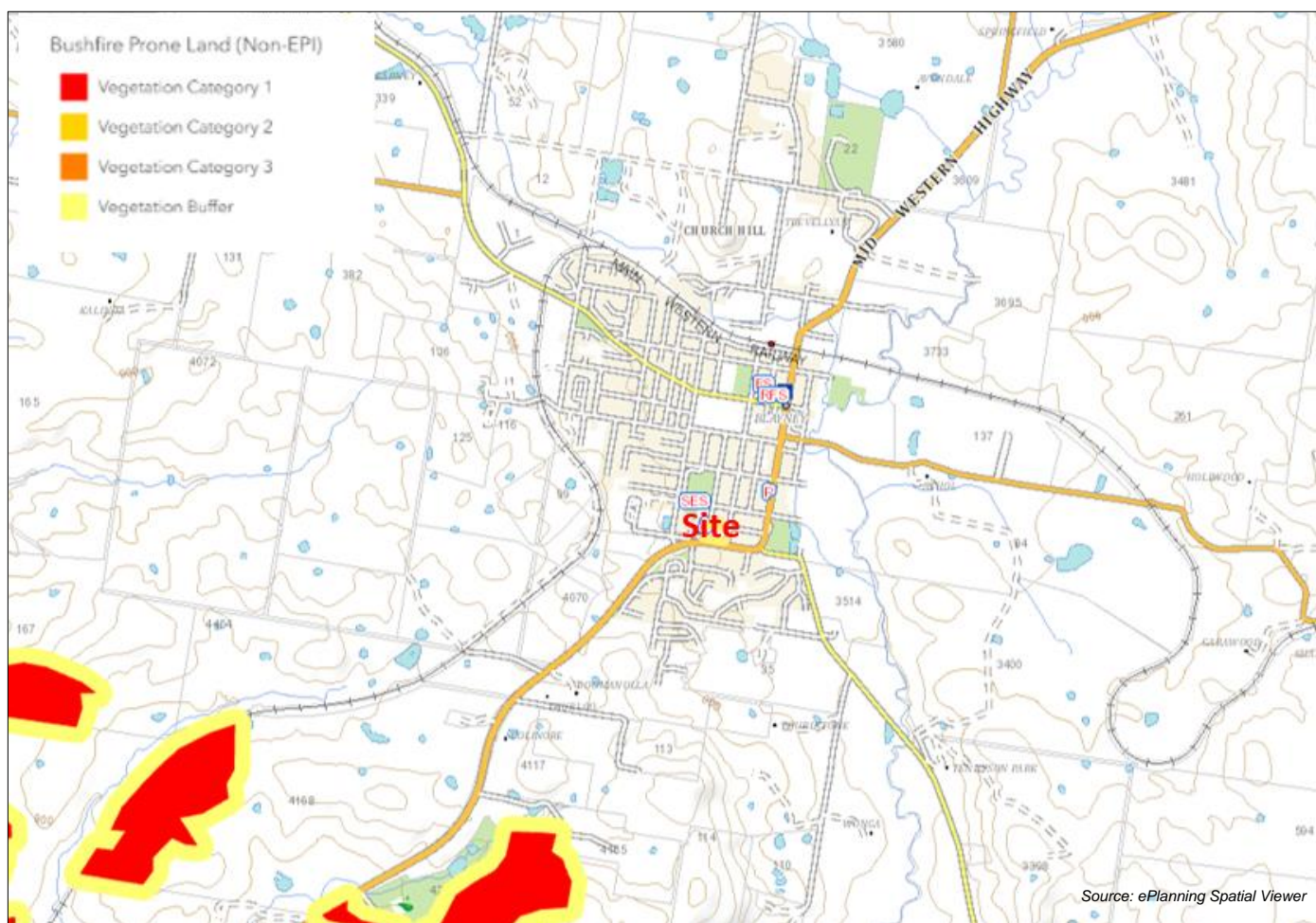


Figure 36: Bushfire Prone Land Map

Impact Assessment

Although the site is not identified as bushfire prone land, a *Bushfire Threat Assessment* (BTA) was prepared as a precautionary measure – see **Appendix 27**. The BTA undertook an assessment of the vegetation and slope in proximity to the site, amongst other measures, and determined that the bushfire attack level applying to the site was ‘BAL – LOW’. This rating equates to a ‘very low’ bushfire risk, which is insufficient to warrant specific risk-mitigation construction requirements, although some level of bushfire risk does remain.

Nevertheless, the BTA assessed the Activity against the ‘acceptable solutions’ and ‘performance criteria’ relevant to listed ‘Special Fire Protection Purpose’ developments, which includes hospitals. The assessment found that the hospital site already does, or can, comply with all relevant ‘acceptable solutions’. Specific mitigation measures are proposed to manage any residual bushfire risk, as outlined in the following section.

In conclusion, the BTA found that, inclusive of the recommended mitigation measures, *the fire hazard present is containable to a level necessary to provide an adequate level of protection to life and property* (p19).

Mitigation Measures

The following mitigation measures would be implemented to manage impacts relating to bushfire:

- A Bush Fire Emergency Management and Evacuation Plan shall be prepared for the site.
- In relation to the residential aged care component of the facility, an Emergency Planning Committee is to be established to consult with residents (and their families) and staff in developing and implementing emergency management procedures.

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?		✓
Will the works involve the installation of structures or services that may be perceived as objectionable or nuisance?		✓
Will the works impact on, or be in the vicinity of other services?		✓

Existing Environment

The Activity involves the re-development of the existing Blayney MPS facility within the boundaries of the current MPS site.

Impact Assessment

The existing use of the site as a health facility will not change, and no additional land will be required for the Activity. While the built format of the facility will change, the areas of landscaping and open space versus built form will remain similar to existing. The Activity would result in a more logical and cohesive layout, with a clearer 'main entry' presentation to the street and carparking areas, and dedicated courtyard and garden areas for users of the site.

The size, scale and form of the re-developed MPS would be similar to the existing, with all buildings single-storey with a 'winged' or articulated form, and landscaped gardens throughout. There would be no new or discordant architectural elements which would render the development incompatible with its environment or local context. Further, as outlined in **Section 6** of this REF, the Activity is not likely to result in significant impacts on adjacent properties and is compatible with the existing neighbouring land uses in the area.

The re-developed MPS would not negatively impact the operation of the adjacent Ambulance Station service. Ambulance access directly into the site from the Station would continue, and an additional new access would be available via Queen Street. The Activity would not have a significant impact on the local road network, as outlined in the *Traffic and Parking Design Development Report* at **Appendix 22**.

Should interruption of any services or utilities be required throughout the construction phase, adequate notification shall be provided to those affected.

Mitigation Measures

The following mitigation measures would be implemented to manage impacts relating to land uses and services:

- Any potential service interruptions shall be minimised as far as practicable and communicated to the relevant services authorities to enable flow on notifications to any affected service customers.

6.2.12 Waste Generation

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

Existing Environment

The existing MPS (operating as a hospital and RAC) has established waste management procedures in place to manage the various waste streams produced.

Impact Assessment

During the demolition and construction phase, numerous waste streams will be produced, including soil / excavation waste, plant material, hazardous materials (e.g. asbestos), bricks, glass, timber and metal waste. The *Preliminary Construction Management Plan* (PCMP) at **Appendix 14** sets out waste management and recycling principles to assist

in managing these streams. Key aspects of the proposed waste management regime include allocation of roles and responsibilities for waste management actions, monitoring and reporting of waste generation and disposal actions, and identification of opportunities for reuse and recycling. All material that cannot be recycled or reused will be disposed to an approved landfill facility. The PCMP estimates that the highest volume of waste production would be during the construction phase.

A *Hazardous Materials Audit* (see **Appendix 28**) was undertaken to determine the presence of hazardous materials within the existing MPS facility. It found a number of hazardous materials which must be managed with appropriate safeguards during the demolition phase, including asbestos and lead. Management of these materials is discussed further in **Section 6.2.13** of this REF. These hazardous materials will be disposed of to appropriately licensed and capable facilities in line with relevant safe work practices.

The preparation of a Construction Waste Management Plan to inform the construction and demolition phase is recommended, as outlined below.

The re-developed MPS will contain a dedicated external bin enclosure, in close proximity to the new Queen Street heavy vehicle entrance, for ease of waste collection. During operation of the MPS facility, separation, collection and management of the following key waste streams is anticipated to be generally as below:

- General waste – stored in skip bins within the external bin enclosure;
- Recycling – stored in ‘sulo bins’ within the external bin enclosure;
- Cardboard – stored in a skip bin within the external bin enclosure;
- Confidential / secure documents – stored in a locked bin within the external bin enclosure;
- Clinical waste (including sharps and cytotoxic) – stored in secure containers within an appropriate air-conditioned room;
- Liquid waste – will be disposed of either to the sewer (where appropriate) or via the proposed trade waste system incorporating appropriate devices for retention and / or treatment (e.g. grease arrestors, cooling pits).

Collection and disposal of waste will be managed by private contractors. Specific waste collection and management protocols are outlined within the *Waste Management Plan – Blayney* at **Appendix 20**, including strategies for waste minimisation.

Mitigation Measures

The following mitigation measures would be implemented to manage impacts relating to waste generation:

- Before construction, a Construction Waste Management Plan (CWMP) shall be prepared addressing waste minimisation principles, safe storage and disposal of waste, and maximising opportunities for re-use and recycling. The CWMP should consider inclusion of the following mitigation measures where practicable:
 - During construction, working areas shall be maintained and cleared of rubbish at the end of each working day.
 - Construction working areas shall accommodate separate bins and other waste storage structures to cater for waste separation, to facilitate resource recovery and recycling.
 - Disposal of waste shall have regard to the relevant waste disposal and management directions within the *Remediation Action Plan* (JK Environments, 2023).
- Operation of the facility shall be undertaken in accordance with the *NSW Health Clinical and Related Waste Management for Health Services* policy directive.

6.2.13 Hazardous Materials and Contamination

Questions to consider	Yes	No
Is there potential for the works to encounter any contaminated material?	✓	

Will the works involve the disturbance or removal of asbestos?	✓
Is the work site located on land that is known to be or is potentially contaminated?	✓
Will the works require a Hazardous Materials Assessment?	✓
Is a Remediation Action Plan required?	✓
Is the work category 2 works under Resilience and Hazards SEPP?	✓

Existing Environment

The site has been identified for use as a hospital since around 1886, with the site likely vacant before this time.

A number of technical investigations were undertaken to examine the contamination status of the site, in particular the following:

- *Desktop Preliminary (Stage 1) Site Investigation* ('Desktop Investigation' - 2022) – see **Appendix 29**;
- *Preliminary (Stage 1) Site Investigation* ('PSI' – 2022) – see **Appendix 30**; and
- *Detailed Site Investigation* ('DSI' – 2023) - see **Appendix 25**.

The Desktop Investigation identified a number of potentially contaminating activities which may have occurred throughout the site's history, including:

- Filling of the site;
- Use of pesticides beneath buildings and around site;
- Use of hazardous building materials (e.g. lead, asbestos);
- Installation, use and abandonment of diesel storage tanks (above ground and below ground); and
- Installation and use of a grease trap.

In addition, the PSI identified potential contamination hazards arising from off-site sources (e.g. from a former underground fuel storage tank at the up-gradient adjacent Ambulance Station) and naturally occurring asbestos within the soil. The plan at **Figure 37** below illustrates the location of some of the potentially contaminating site features.

In order to quantify the potential for contamination, intrusive investigations of the soil and groundwater were undertaken as part of the PSI and DSI. Numerous test points were established across the site, including 33 boreholes, 6 groundwater monitoring wells, and 2 soil vapour implants. In addition, a ground penetrating radar scan was undertaken in the vicinity of the redundant underground fuel storage tank (UST).

The soil, water and soil vapour samples were subjected to laboratory analysis in order to identify levels of potential contaminants. The results were then assessed against specific Site Assessment Criteria (SAC), which included consideration of human health and environmental assessment criteria relevant to the existing and proposed use of the site as a hospital, and the potential impacts on the environment.

The investigations noted the following key results:

- Fill ranging in depth between approximately 0.1m to 1.4m below ground level were encountered across the site. The fill contained anthropogenic inclusions such as ceramic and brick fragments, sand, ash, and slag.
- Arsenic and chromium (as total chromium) were detected in fill soils above the SAC in limited locations, as indicated in **Figure 38** below. However, as outlined within the DSI, potential risks associated with these heavy metals were considered to be low in the context of the current and ongoing use of the land as a hospital, and there was no unacceptable ecological risk.
- No asbestos was encountered during DSI sampling, although asbestos was encountered in fill / soil in one location during PSI fieldwork.

- Soil vapour analysis identified levels of bromodichloromethane, 1,3-butadiene and chloroform above the SAC (see **Figure 38**), which may be attributable to the presence of the derelict UST and leaking potable water infrastructure containing trihalomethanes. The DPI considered that there is a low potential for unacceptable soil vapour risks that would warrant remediation.
- Groundwater analysis identified concentrations of zinc and chromium above the SAC (see **Figure 38**). The zinc exceedances were consistent across the sampling network and were considered to be associated with regional factors. The chromium exceedance was considered to be minor, and ecological risks were found to be low and acceptable.
- Some data gaps remain, primarily due to the access limitations imposed by the presence of existing buildings, structures and services.

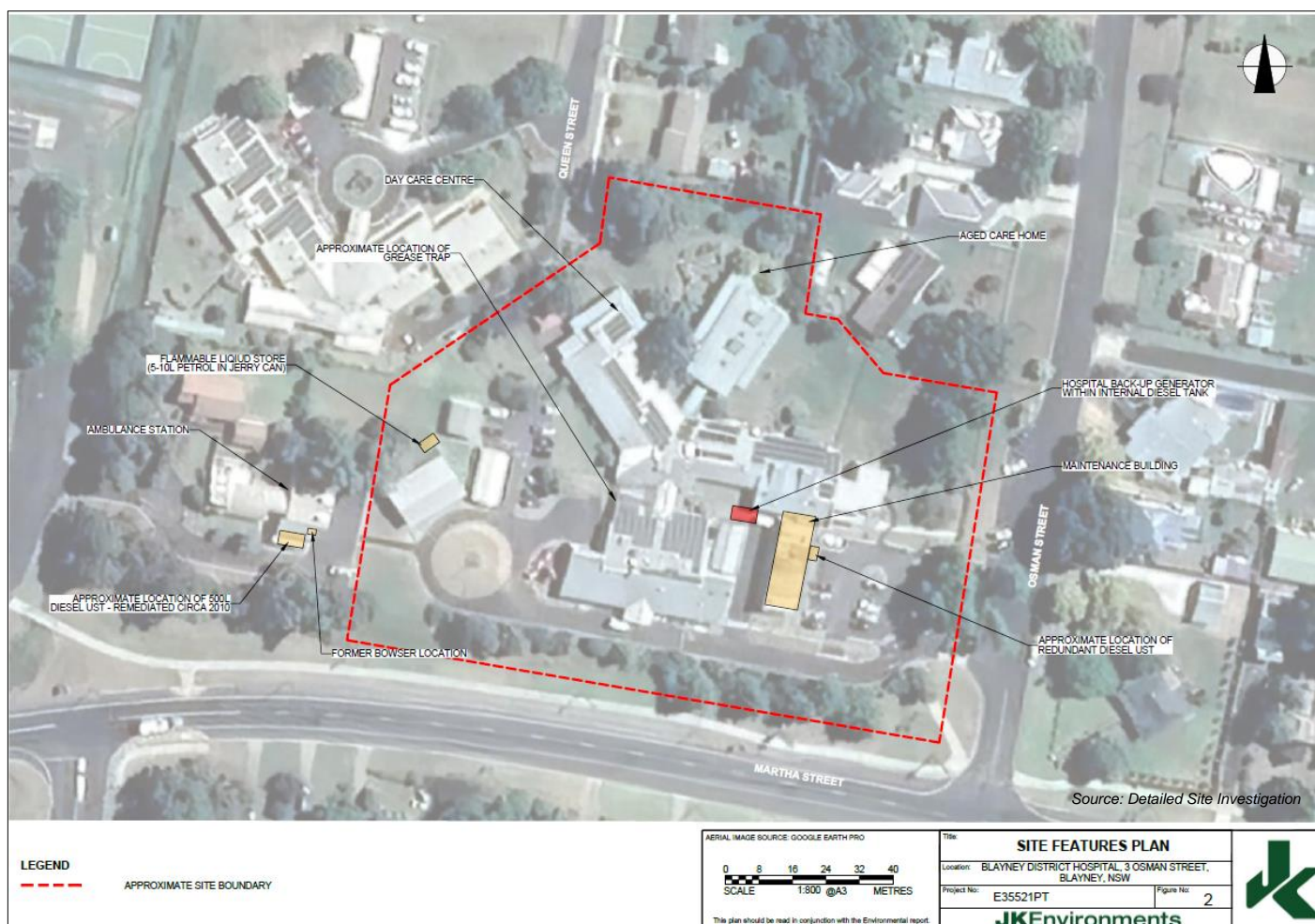


Figure 37: Plan showing location of site features relevant to contamination

Based on the results of investigations, it was concluded that remediation of the site would be required, and a Remediation Action Plan (RAP) should be prepared. Further, additional investigation and risk assessment was required to resolve outstanding data gaps. However, it was considered this further investigation could occur pursuant to the RAP because a large portion of the work would need to occur after demolition in order to resolve access issues.

Accordingly, a RAP was prepared (see **Appendix 13**) to address the recommendations of the site investigations, including outlining a strategy for the proposed remediation of the site. The primary aims of the remediation are to mitigate risks from asbestos, and to remove the UST, any associated infrastructure and any localised impacted soil within the vicinity of the UST. The objectives of the RAP are to:

- Document the requirements for pre-remediation (data gap) investigation;

- Provide a rationale to support the extent of the proposed remediation and the remedial/site validation approach based on the current dataset;
- Document a methodology that is to be implemented to remediate and validate the site; and
- Document a strategy that can be implemented in the event of uncovering any unexpected, contamination related finds, and provide other relevant contingency plans.

The RAP includes provisions for carrying out the required activities and reporting to align with the 3 proposed construction stages of the MPS redevelopment. A validation report should be prepared on completion of remediation activities for each development stage and submitted to the determining authority to demonstrate that each stage is suitable for the proposed use following completion of remediation/validation.

The RAP concludes that the site can be made suitable for the proposed ongoing hospital use via remediation and the implementation of the RAP.

It is noted that a *Hazardous Materials Audit* and *Asbestos Management Plan* (**Appendices 28 and 31** respectively) were prepared separately to the contamination investigations above. These provide an understanding of the presence and nature of potentially hazardous materials within the existing operating Blayney MPS structures and facilities, such as asbestos-containing materials within building structures, lead-based paint, flammable materials and radioactive materials (associated with X-rays). These documents provide recommendations for the safe management of hazardous materials up to and including the time of their removal / demolition.

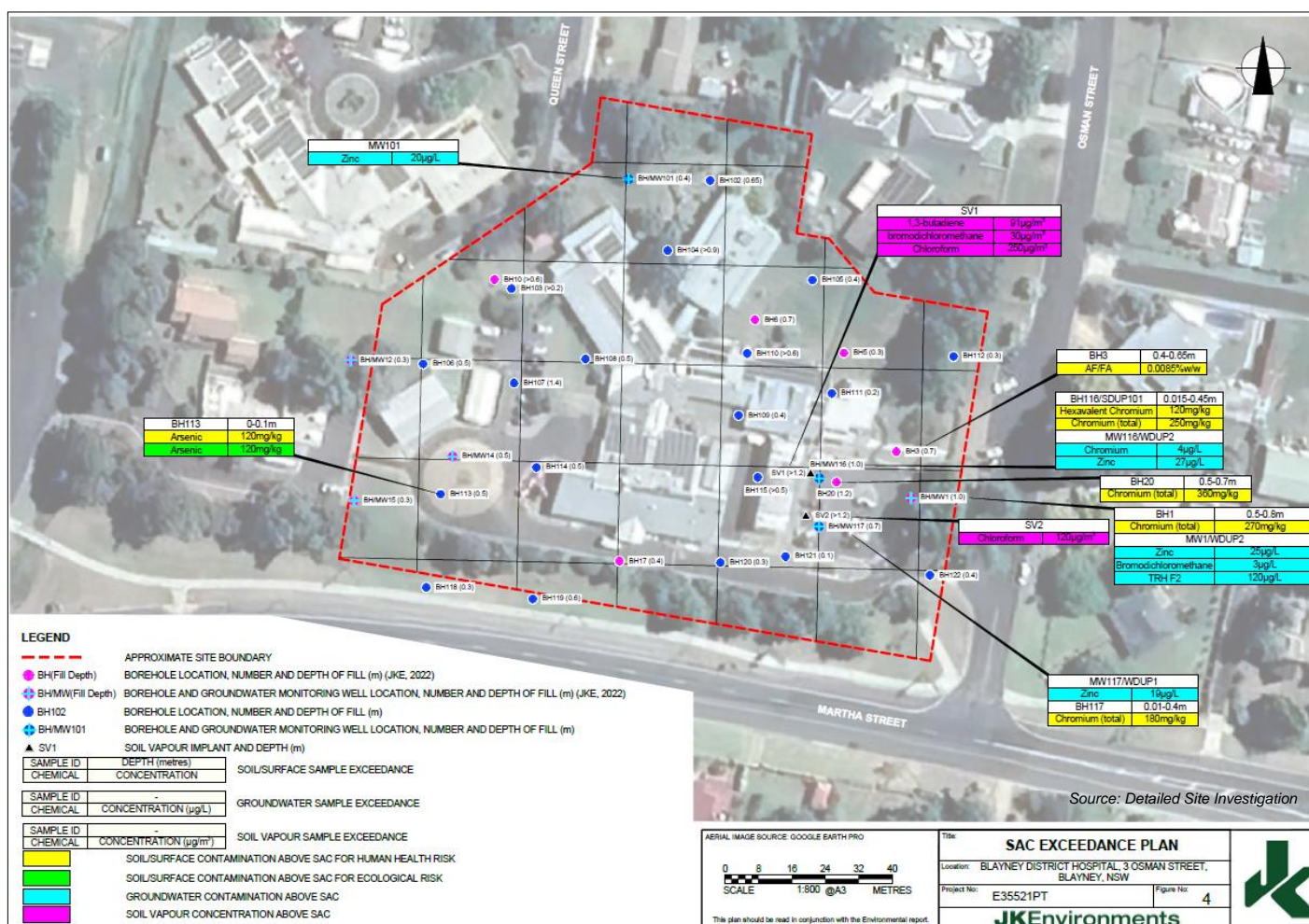


Figure 38: Contaminant Site Assessment Criteria Exceedance Plan

Impact Assessment

As outlined within the above section, the site is currently impacted by areas of contaminants. Several hazardous materials are present throughout the existing MPS structures and buildings.

The Activity will be undertaken in accordance with the directives of the RAP, which includes consideration of hazardous materials currently on site. Accordingly, contamination is anticipated to be resolved and the site will be made suitable for the ongoing use of the site as a hospital.

Mitigation Measures

The following mitigation measures would be implemented to manage impacts relating to hazardous materials and contamination:

- All construction and demolition work, including waste disposal, should be undertaken with regard to the recommendations of the *Remediation Action Plan* (prepared by JK Environments, 2023), including the *Hazardous Materials Audit* and *Asbestos Management Plan* (both prepared by Envirowest Consulting, 2022). The Construction Management Plan should be prepared with regard to these recommendations.
- Where relevant, all required regulatory notifications and permits are to be obtained including Notification of Category 2 Remediation Works to Council for the remedial work at least 30 days before the commencement of the work. Notice must be given in accordance with clause 4.13 of the *State Environmental Planning Policy (Hazards and Resilience) 2021*.

6.2.14 Community Impact / Social Impact

Questions to consider	Yes	No
Is the activity likely to affect community services or infrastructure?	✓	
Does the activity affect sites of importance to local or the broader community for their recreational or other values or access to these sites?		✓
Is the activity likely to affect economic factors, including employment numbers or industry value?	✓	
Is the activity likely to have an impact on the safety of the community?		✓
Will the activity affect the visual or scenic landscape? This should include consideration of any permanent or temporary signage.	✓	
Is the activity likely to cause noise, pollution, visual impact, loss of privacy, glare or overshadowing to members of the community, particularly adjoining landowners?	✓	

Existing Environment

The Blayney MPS is situated within the township of Blayney, within the Blayney LGA. A *Social Impact Assessment* (SIA) prepared for the Activity (see **Appendix 32**) provides an analysis of the general community profile of Blayney based on available demographic data. Key outcomes include the following:

- In 2021 Blayney suburb had an estimated population of 2,997;
- The Blayney LGA has an older population (median of 43) compared to Blayney suburb (38) and NSW (38);
- Blayney suburb has a high Indigenous representation, comprising 8.1% Aboriginal / Torres Strait Islander people, compared to Blayney LGA (5.8%) and NSW (3.4%);
- Blayney suburb residents have lower tertiary qualifications (19.9%) compared to NSW (23.8%);
- Blayney suburb has high health sector employment, with hospitals being the second largest industry of employment (4.4% of residents);
- Blayney suburb has fewer people of working age, at 40.4% compared to NSW (46.6%);

- Blayney suburb has high levels of disadvantage, ranked in the lower 20% of suburbs for relative socio-economic advantage and disadvantage.

The SIA notes that understanding the community's profile assists in gaining an understanding of how a community lives and that community's potential capacity to adapt to changes arising from a proposal.

Regarding the current demand for medical resources within Blayney, the SIA noted that, in 2021-2022, there were approximately 1,036 presentations to the Blayney MPS emergency department, including 97 requiring emergency care. Health data indicates that Blayney has higher rates of certain medical presentations to hospital than NSW, including those associated with cardiovascular and diabetes conditions for Indigenous people; smoking attributable conditions; overweight and obesity attributable conditions; and intentional self-harm.

Impact Assessment

The SIA provides a detailed assessment of the likely expected and perceived impacts of the proposed MPS re-development on the Blayney community. It found the key social impacts were as follows:

- Delivery of new and improved regional health services upgrades to the MPS will benefit the health and wellbeing of residents in the Blayney area significantly. The re-development will increase the scope and capacity of health services available to its users.
- Increased quality of aged care accommodation/services within the Blayney MPS which will have a significant benefit to the health and wellbeing of residents through increased quality of care.
- Benefits to users' experience with the expansion of non-medical services and facilities at the Blayney MPS will have a resultant benefit on users' health and wellbeing by enhancing their overall experience of the MPS.
- Provision of job opportunities with additional jobs created as a consequence of the Blayney MPS re-development, benefitting the livelihood of the local community, specifically those who could be employed in the construction workforce or as medical staff.
- In summary, the SIA found that the Activity would have an overall positive benefit on the local community.

Mitigation Measures

The following mitigation measures would be implemented to manage impacts relating to community and social impact:

- HI's communication team shall maintain clear and efficient communication to ensure that the community is aware of which services will be introduced, what they can access, and delivery timeframes.
- Once operational, consider specific programs and/or activities which could be hosted at these facilities to benefit users.

6.2.15 Cumulative Impact

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

Existing Environment

The site is located within an established predominantly residential area, with rural land approximately 200m to the west. The CBD of Blayney is located approximately 400m to the north-east. Large areas of open space and recreation grounds are located to the north-west and east. With the possible exception of the adjacent Lee Hostel, there are no industrial, high-intensity or large-scale developments within a 500m radius of the site.

Impact Assessment

A review of the NSW Major Project's Register and Regional Planning Panel Register (NSW Planning Portal); and the Blayney Development Application Tracker was undertaken in March 2023. It found no recently lodged or approved significant developments within proximity to the site which could have significant implications for traffic, infrastructure services, amenity and / or other environmental impacts in relation to the proposed Activity.

The scale of the proposed development is not considered significant and presents minimal environmental impacts that can be adequately addressed via the safeguards outlined within this REF.

It is expected that the Activity would add to a number of common cumulative impacts, including resource consumption (e.g. construction materials) and generation of greenhouse gas emissions (e.g. through operation of vehicles and equipment and the use of electricity). However, the environmental management measures identified within this REF and the choice of methodology for completion of the works aim to minimise the extent to which the Activity contributes to cumulative adverse environmental impacts.

Considering the absence of any significant local developments, and the environmental mitigation measures outlined throughout this REF, the cumulative impacts of undertaking the proposed Activity in the context of the locality are considered to be low.

Mitigation Measures

The following mitigation measures would be implemented to manage impacts relating to cumulative impacts:

- Before and throughout the construction phase, project staff shall periodically monitor the NSW Planning Portal and the Blayney Development Application Tracker for any significant approved developments within the locality with the potential to coincide with the Activity construction phase.
- Where required, project staff shall undertake liaison with other development sites to identify and mitigate potential cumulative construction works impacts (e.g. via coordination of delivery times and road closures, rationalisation of construction parking etc). The Construction Management Plan should be prepared with regard to these recommendations.

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 33**.

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 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 re-development of the Blayney Multipurpose Service facility at No. 3 Osman Street, Blayney 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 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 and Public Spaces under Part 5.1 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.