

HEALTH INFRASTRUCTURE

Addendum 2 - Review of Environmental Factors

Gunnedah Hospital Redevelopment

01 August 2024

Version 2



Declaration

This Addendum Review of Environmental Factors (Addendum REF) has been prepared for Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from variations to the roof design, central courtyard design, the helipad ramp design, the medical gas plant footprint, additional tree removal and require compensatory planting at a minimum of a 1:1 replacement ration at Gunnedah Hospital, 10 Anzac Parade, Gunnedah (Lot 3 DP 792209).

A REF for the Gunnedah Hospital Redevelopment was endorsed by HI on 22 September 2023. An Addendum to the REF was endorsed by HI on 11 July 2024. This Addendum REF has been prepared in accordance with the relevant provisions of *the Environmental Planning and Assessment Act 1979* (EP&A Act), *the Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), the Department of Planning & Environment’s (DPE) *Guidelines for Division 5.1 Assessments* (the Guidelines) and *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&ISEPP).

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

Declaration	
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A	Section 10.7 Planning Certificate No. 172882	Gunnedah Shire Council	19/07/2022
B	Architectural Drawings	dwp	19/07/2024
C	Landscape Architectural Drawings	Stewart Surveys	18/07/2024
D	Arboricultural Impact Assessment	Wade Ryan Contracting	24/06/2024

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
DPE	Department of Planning and Environment

Abbreviation	Description
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
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
T&ISEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	Water Management Act 2000

Executive Summary

The Amended Proposal Overview

Health Infrastructure endorsed the REF for the redevelopment of the Gunnedah Hospital on 22 September 2023. An Addendum to the endorsed REF was endorsed by HI on 11 July 2024. Further minor amendments to the approved architectural and landscape design and tree removal are required. The need for amendments has come about through the detailed design process whereby improvements and non-compliances have been identified and need to be rectified.

Need for the Amended Proposal

The need for a second Addendum REF arose through the detailed design of the project. Several minor design refinements are required to achieve the best possible outcome for the hospital redevelopment. The changes have not come about due to any particular design challenge or constraint. An amended REF is necessary to assess any impacts on the environment as a result of the proposal.

Amended Proposal Objectives

The amended proposal does not amend or impact upon the primary objective of the Activity which is to provide improved emergency health services for regional and rural NSW. Secondary objectives for the Activity include minimising biodiversity impacts.

Options Considered

There are no other viable alternative options available.

Site Details

The Gunnedah Hospital is located at 10 Anzac Parade, Gunnedah (Lot 3 DP 792209). The site is located within the Gunnedah Shire Local Government Area (LGA), within the New England North West Region of NSW.

The broader Gunnedah Hospital project site is made up of three existing lots:

- The Gunnedah Hospital and associated buildings, Rural Health Centre and Ambulance Station are contained within Lot 3 DP 792209;
- The Lions Park with park structures and landscaping are contained within Lot 2 DP 792209; and
- The Alkira Nursing Home is contained with Lot 1 DP 792209.

Planning Approval Pathway

The activity involves the redevelopment of an existing health services facility (hospital) which is classified as development without consent as the proposed activity is consistent with section 2.61(1) of T&ISEPP. Therefore, the proposal is subject to an environmental assessment (REF). The amended proposal does not alter the planning approval pathway.

Statutory Consultation

The amended proposal is a minor variation to the original proposal. No further consultation is required.

Environmental Impacts

There is no significant change in environmental impacts as a result of the amended proposal other than the removal of eight additional trees.

Justification and Conclusion

All matters affecting, or likely to affect, the environment by reason of the amended proposed activity have been examined by the Addendum REF in the context of the Department of Planning & Environment's (DPE) *Guidelines for Division 5.1 Assessments* (the Guidelines), consistent with section 171(1) 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). As outlined in the Addendum REF, the amended proposal is a minor variation which will not result in any significant or long-term impact.

The proposed activity is not within a declared area of outstanding biodiversity value and is not likely to significantly affect threatened species, populations or ecological communities, or their habitats or impact biodiversity values, meaning a SIS and/ or BDAR is not required. The environmental impacts of the amended proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Division 5.1 of the EP&A Act. On this basis, it is recommended that HI determine the proposed activity in accordance with Division 5.1 of the EP&A Act and subject to the adoption and implementation of any mitigation measures identified within this report.

1. Introduction

Health Infrastructure (HI) propose to amend the proposal to redevelop the Gunnedah Hospital at 10 Anzac Parade, Gunnedah. The Gunnedah Hospital Redevelopment (GHR) includes reconfiguration of assets to meet contemporary standards in models of care and facility design to improve sustainability and efficiency across the health service. The modifications sought are as follows:

- Redesign of the central courtyard to remove split level
- Modification to the roof design at the interface of new and existing buildings
- Modification to the design and footprint of the fire plant
- Modification to the design and footprint of the medical gas plant
- Provision of a pedestrian pathway providing access to the medical gas service facility riser
- Modification of the ramp to the helipad
- Modifications to proposed tree removal (eight additional trees to be removed)
- Modification to Mitigation Measure 10. Landscape Plans and compensatory planting requirements

This Addendum Review of Environmental Factors (REF) has been prepared by GeoLINK on behalf of HI to determine any changes to the environmental impacts as identified within the REF dated 10 August 2023 and REF Addendum 1 dated 13 June 2024. 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 Addendum REF is to describe the amended proposal, to document the likely altered impacts of the amended proposal on the environment and to detail any changes to the protective measures, identified in the REF and Addendum 1, to be implemented to mitigate impacts.

The description of the additional proposed works and associated altered environmental impacts have been undertaken in the context of section 171 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), the *Guidelines for Division 5.1 Assessments* (DPE June 2022) and the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

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

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

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

1.1 Proposal overview

HI proposes to undertake redevelopment works at Gunnedah Hospital, including:

- New single storey redevelopment including inpatient, maternity, birthing and emergency department
- Landscaped central courtyard with stair and ramp access to lower level
- Private landscaped birthing courtyard

- Landscaped gathering courtyard
- New single storey plant room and enclosed rainwater harvesting plant yard
- Refurbished and separated back of house loading zone
- New substation, bulk oxygen tank, fire protection tanks and pumpset
- New emergency parking, drop off zone and 24/7 entry
- New accessible ramp to helipad
- Improved signage and wayfinding strategy

The activity includes utility adjustments, stormwater infrastructure, essential services connections, solar power units, establishing and decommissioning of a temporary site compound, erosion and sediment controls, internal traffic/pedestrian management and site stabilisation at the completion of works. 22 trees were identified as requiring removal in the original REF.

1.2 Amended Proposal Need

The required changes are minor in nature and have occurred as a result of the detailed design process for the hospital development. Through detailed design, better solutions and design refinements have been made.

The only additional environmental impact that will occur as a result of the modification is the removal of eight additional trees. All of these trees are native, non-endemic species and are unfortunately in conflict with the proposed stormwater works to occur along Marquis Street.

There are no significant changes to environmental, visual, or social impacts as a result of the amended proposal.

An overview of the amended proposal is provided within Table 1.

Table 1 Alternatives Considered for the Amended Proposal

Alternative description	Advantages and disadvantages
Redesign of the central courtyard to remove split level	<p>Advantages:</p> <ul style="list-style-type: none"> • The proposed modification removes the ramp system from the middle of the central courtyard whereby creating more useable area for recreation and landscaping. • Plant area is completely separated from the public access zones with a ramp provided for ease of equipment movements. • Courtyard can be maintained more easily with the design also implementing more shading, additional planting for privacy to new maternity and bench seating. <p>Disadvantages:</p> <ul style="list-style-type: none"> • There are no disadvantages to the proposed modification.
Modification to the roof design at the interface of the new IPU building and the existing main hospital building	<p>Advantages:</p> <ul style="list-style-type: none"> • The revised corridor 4 extension roof provides a better design solution that reduces risk of stormwater overflow and flooding at the interface of old and new buildings. • Original design had a landlocked box gutter which has now been removed. • The revised IPU roof provides a future proof design solution that will allow for a straightforward future expansion of the new IPU building over an existing dental area. <p>Disadvantages:</p> <ul style="list-style-type: none"> • There are no disadvantages to the proposed modification.
Modification to the design of the fire plant	<p>Advantages:</p> <ul style="list-style-type: none"> • The configuration of the components of the fire plant has been further refined to achieve the most logical arrangement of the infrastructure. The plant has not increased in size and does not change the level of visual amenity. <p>Disadvantages:</p> <ul style="list-style-type: none"> • There are no disadvantages to the proposed modification.

Alternative description	Advantages and disadvantages
Modification to the location of the medical gas enclosure	<p>Advantages:</p> <ul style="list-style-type: none"> The medical gas enclosure has been shifted slightly to the north-west to achieve a neater configuration of the medical gas plant. The plant has not increased in size and does not impact on visual amenity. The movement of the suction plant also allows for the existing generator to maintain line of sight when refilling and the future removal strategy is also maintained. <p>Disadvantages:</p> <ul style="list-style-type: none"> There are no disadvantages to the proposed modification.
Provision of a pedestrian pathway providing access to the medical gas service facility riser added to the western façade of the inpatient unit in REF Addendum 1	<p>Advantages:</p> <ul style="list-style-type: none"> The proposed modification provides access without walking through garden bed or lawn area. <p>Disadvantages:</p> <ul style="list-style-type: none"> There would be a very minor reduction in landscaped area.
Extension of the connection ramp between the helipad and emergency department	<p>Advantages:</p> <ul style="list-style-type: none"> Ramp has now been extended to provide a fully compliant 1:20 ramp per AushFG requirements. The ramp extension provides better connectivity between the helipad and hospital building. <p>Disadvantages:</p> <ul style="list-style-type: none"> There would be a minor increase in impervious area.
Eight additional trees to be removed (Tree 7, 8, 11, 12, 13, 14, 15 and 17)	<p>Advantages:</p> <ul style="list-style-type: none"> The removal of these trees allows for the best possible stormwater design solution for the proposed hospital. None of the eight trees are remnant or hollow bearing, minimising the ecological impact. <p>Disadvantages:</p> <ul style="list-style-type: none"> The trees provide minimal habitat for fauna species, particularly birds, which will be removed.
Re-wording of Mitigation Measure 10 Landscape Plans to require compensatory planting to be provided at a minimum 1:1 basis	<p>Advantages:</p> <ul style="list-style-type: none"> Compensatory planting will occur on a 1:1 basis, which is the general requirement for HI projects. The landscaping costs associated with the project will be reduced. <p>Disadvantages:</p> <ul style="list-style-type: none"> The percentage site cover of vegetation will not be increased, which would be a desirable outcome for the project.

2. Site Analysis and Description

2.1 The Site and Locality

Table 2 Description of the Site

Details	Proposal (endorsed REF)	Amended proposal (this REF)
Address	10 Anzac Parade, Gunnedah	No change
Legal Description	Lot 3 DP 792209	No change
Zoning	R2 Low Density Residential	No change
Site Area	3.62 ha	No change
Owners	NSW Health	No change
Heritage	No heritage items	No Change
Flooding	Not flood affected	No Change
Acid Sulfate	No Acid Sulfate Soils	No change
Surrounding land uses	The hospital site is located south of the Gunnedah town centre and Mungindi railway line, which runs alongside the two-lane Oxley Highway, located to the north of the hospital site. The Gunnedah High School is located to the west of the site, and the Gunnedah Memorial Pool is located to the east. The hospital site is zoned R2 Low Density Residential and is generally surrounded by residential uses (R3 Medium Density Residential zoning) to the south and east.	No Change

2.1.1 Existing Development

The Gunnedah Hospital consists of a number of single storey, predominantly brick, hospital buildings including, but not limited to:

- Gunnedah Hospital (which contains; Administration, Community health, Family health, Function room, Physio, Dental clinic, Kitchen, Back of house, Maternity and Birthing, Chapel, Staff support, General Wards, Emergency, Day surgery, Theatre, Imaging and CSSD).
- Support buildings (including Engineering, Generator, Mortuary, Day care centre, Staff accommodation and Clinics, Kiosk and Education centre).
- Gunnedah Rural Health Centre.
- Gunnedah Ambulance Station and Helipad.

The hospital buildings are spread across the site, interspersed with open green spaces and established trees and smaller shrubs and carparking areas. There are few formal garden plantings or landscaped zones within the site.

2.1.2 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 7252 dated 19 July 2022 identifies that the site is located within the R2 Low Density Residential zone under the Gunnedah Local Environmental Plan 2012, and is provided at **Appendix A**.

Table 3 below provides a summary of the constraints as identified in the Planning Certificate.

Table 3 Section 10.7 Planning Certificate

Affectation	Yes	No
Critical habitat		✓
Conservation area		✓
Item of environmental heritage		✓
Affected by coastal hazards		✓
Proclaimed to be in a mine subsidence district		✓
Affected by a road widening or road realignment		✓
Affected by a planning agreement		✓
Affected by a policy that restricts development of land due to the likelihood of landslip		✓
Affected by bushfire, tidal inundation, subsidence, acid sulfate or any other risk		✓
Affected by any acquisition of land provision		✓
Biodiversity certified land or subject to any biobanking agreement or property vegetation plan		✓
Significantly contaminated		✓
Subject to flood related development controls		✓

3. Proposed Amended Activity

3.1 Proposal Overview

3.1.1 Architecture

Modifications to the architectural design of the Activity are required. These modifications are minor and are required to resolve design and construction challenges that have occurred in the detailed design process. The proposed modifications to the architectural design are summarised in **Table 4**. The revised architectural drawings are provided at **Appendix B**.

Table 4 Architectural Design Modifications

Modification	Drawing Number	Description
Redesign of the central courtyard to remove split level	GHR-AR-00-0012 Site Complete Works – Landscaping	The redesigned central courtyard does not include a ramp system in the middle of the design. This ramp has been moved to be adjacent to the existing general ward. The new courtyard design will be at a single level and have more useable area. Further discussion on this landscape design change is provided in Section 3.1.2.
Modification to the roof design at the interface of the new IPU building and the existing main hospital building	GHR-AR-00-6900 Façade Concept GHR-AR-MW-2001 GHR-AR-MW-2002 Building Elevations GHR-AR-MW-3002 Site Sections	The roof design on the new IPU has been changed to include a box gutter at the interface of the new IPU and the existing hospital building. The new design is a better solution that removes the risk of the gutter overtopping and causing flooding into either the new building or the dental and physio sections of the existing building, during significant rainfall events. Furthermore, the revised design future proofs the new IPU by allowing for a simple roof extension if the building were to be extended to the west in any future hospital expansion.
Modification to the design of the fire plant	GHR-AR-00-0012 Site Complete Works – Landscaping	The configuration of the components of the fire plant has been further refined to achieve the most logical arrangement of the infrastructure. The plant has not increased in size and does not change the level of visual amenity.
Modification to the location of the medical gas enclosure	GHR-AR-00-0012 Site Complete Works – Landscaping	The medical gas enclosure has been shifted slightly to the north-west to achieve a neater configuration of the medical gas plant. The plant has not increased in size and does not impact on visual amenity.
Provision of a pedestrian pathway providing access to the medical gas service facility riser added to the western façade of the inpatient unit in REF Addendum 1	GHR-AR-00-0012 Site Complete Works – Landscaping	A pedestrian pathway to the medical gas service facility has been added to the western wall of the inpatient unit, adjacent to the gathering courtyard.
Extension of the connection ramp between the helipad and emergency department	GHR-AR-00-0012 Site Complete Works – Landscaping	The connection ramp between the helipad and the emergency department has been extended slightly to achieve better access for personnel transporting patients from the helipad into the hospital. The extension allows the ramp to have a lesser gradient.

3.1.2 Landscape Architecture

3.1.2.1 Central Courtyard Design

The central courtyard has been redesigned to achieve a single level across the courtyard, with no central ramp system. The revised design includes connecting pathways, lawn areas, seven 1.5 m high landscape mounds with a tree planted at the top, mass planted garden beds and a central, circular garden. The design includes seating throughout and a drinking fountain. The central courtyard will still feature a children's playground, set on a softfall surface, and covered by a shade structure.

3.1.2.2 Tree Removal

Endorsed Addendum REF 1 (11 July 2024) included the removal of 24 trees and large shrubs. This Addendum REF seeks to remove an additional 8 trees, bringing the total to 32 trees. The additional 8 trees to be removed are tree 7, 8, 11, 12, 13, 14, 15 and 17. These trees are all in conflict with the proposed stormwater infrastructure to be installed along Marquis Street except for tree 17, which is located in the courtyard. None of the additional trees to be removed are hollow-bearing trees (see Biodiversity Assessment Report prepared by GeoLINK, dated 14/06/2023). **Table 5** describes the 32 trees to be removed. The additional trees to be removed are shaded grey.

Table 5 Tree Removal

Number	Species	Origin	Retention Value
1	<i>Brachychiton populous</i> (Kurrajong)	Native	Poor
2	<i>Jacaranda mimosifolia</i>	Exotic	Very poor
7	<i>Corymbia ficifolia</i> (Hybrid form flowering gum)	Native	Very poor
8	<i>Eucalyptus camaldulensis</i> (River Red Gum)	Native	Fair
11	<i>Corymbia ficifolia</i> (Hybrid form flowering gum)	Native	Poor
12	<i>Corymbia ficifolia</i> (Hybrid form flowering gum)	Native	Poor
13	<i>Corymbia ficifolia</i> (Hybrid form flowering gum)	Native	Poor
14	<i>Corymbia ficifolia</i> (Hybrid form flowering gum)	Native	Poor
15	<i>Eucalyptus sp.</i>	Native	Fair
17	<i>Escallonia species</i>	Exotic	Poor
26	<i>Melia azedarach</i> (White Cedar)	Native	Very poor
38	<i>Escallonia species</i>	Exotic	Good
39	<i>Eucalyptus camaldulensis</i> (River Red Gum)	Native	Fair
40	<i>Eucalyptus camaldulensis</i> (River Red Gum)	Native	Good
41	<i>Plumeria</i> (frangipani)	Exotic	Poor
42	<i>Lagerstroemia species</i> (Crepe myrtle)	Exotic	Poor
43	<i>Lagerstroemia species</i> (Crepe myrtle)	Exotic	Poor
44	<i>Citrus Species</i> (Orange)	Exotic	Poor
45	<i>Ulmus glabra</i> 'Lutescens' (Golden Elm)	Exotic	Poor
46	<i>Ulmus glabra</i> 'Lutescens' (Golden Elm)	Exotic	Poor
47	<i>Ulmus glabra</i> 'Lutescens' (Golden Elm)	Exotic	Poor
48	<i>Ulmus glabra</i> 'Lutescens' (Golden Elm)	Exotic	Poor
49	<i>Ulmus glabra</i> 'Lutescens' (Golden Elm)	Exotic	Fair

Number	Species	Origin	Retention Value
50	<i>Fraxinus angustifolia</i> subsp. <i>Angustifolia</i> (Desert Ash)	Exotic	Good
51	<i>Fraxinus</i> "Raywood" (Claret Ash)	Exotic	Poor
52	<i>Pyrus calleryana</i> 'Capital'.	Exotic	Fair
53	<i>Pyrus calleryana</i> 'Capital'.	Exotic	Fair
54	<i>Pyrus calleryana</i> 'Capital'.	Exotic	Poor
55	<i>Eucalyptus camaldulensis</i> (River Red Gum)	Native	Good
56	<i>Grevillea robusta</i> (Silky Oak)	Native	Fair
57	<i>Jacaranda mimosifolia</i>	Exotic	Good
64	<i>Jacaranda mimosifolia</i>	Exotic	Excellent

3.1.2.3 Mitigation Measure 10 Landscape Plans

Mitigation measure 10 states that a minimum of 40 replacement trees, native to the region, must be planted. This Addendum REF seeks to reduce the number of replacement trees to a minimum replacement ratio of 1:1 and remove the requirement for these trees to be native to the region.

This modification is sought to reduce the area required for landscape planting and to minimise landscaping costs associated with the project. Additionally, removing the words "native to the region" will allow for the landscaping trees within the gathering courtyard, central courtyard and birthing courtyard to be of a species more suitable to a courtyard environment i.e. deciduous, non-invasive root system.

3.2 Operational Activities

The modifications sought will have no impact on the operational activities of the Gunnedah Hospital.

4. Statutory Framework

4.1 Activity Description under T&ISEPP

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

State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&ISEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the T&ISEPP outlines the approval requirements for health service facilities. An hospital is defined as a health service facility under this division.

The site is zoned R2 Low Density Residential under the Gunnedah Local Environmental Plan 2012 (GLEP). The R2 Zone is a prescribed zone under the T&ISEPP. Section 2.61(1) of the T&ISEPP permits the following works without consent on any land, provided that it is carried out by or on behalf of a public authority and the development is carried out within the boundaries of an existing health services facility:

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

The Gunnedah Hospital Redevelopment involves activities identified at (a), (c) and (e) above; the erection of a building that is a health services facility, demolition of buildings carried out for the purposes of a health services facility and car parks to service patients or staff of, or visitors to, the health services facility. The works are within the grounds of the Gunnedah Hospital and are being carried out on behalf of Health Infrastructure and NSW Health. Section 2.61(2) of the T&ISEPP does not preclude the activity as it does not involve the erection of any building that exceeds 15 m in height.

Furthermore, as the GHR contains a new electricity substation, the provisions of T&ISEPP Division 5 Electricity Transmission or Distribution apply. Under Section 2.44(1) development for the purpose of an electricity transmission or distribution network may be carried out by or on behalf of an electricity supply authority or public authority without consent on any land.

Therefore, the proposal was considered an 'activity' for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment (REF). The proposal is considered an 'activity' in accordance with section 5.1 of the EP&A Act because the development involves the erection of a building and the carrying out of a work. The amended proposal does not alter this planning approval pathway.

T&ISEPP consultation is discussed within section 5 of this REF.

Table 6 Description of Proposed Activities

Division and Section within T&ISEPP	Proposal (endorsed REF)	Amended proposal (this REF)
Section 2.44(1)	Development for the purpose of an electricity transmission or distribution network	No change
Section 2.61(1)(a)	Erection or alteration of, or addition to a building that is a health services facility	No change
Section 2.61(1)(c)	Demolition of an existing building, which may be carried out by or on behalf of a public authority without consent on any land if the development is	No change

Division and Section within T&ISEPP	Proposal (endorsed REF)	Amended proposal (this REF)
	carried out within the boundaries of an existing health services facility.	
Section 2.61(1)(e)	Car parks to service patients or staff of, or visitors to, the health services facility	No change

4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) did not affect the proposal as it was not development that takes place on or affects Commonwealth land or waters. Further, it was not development carried out by a Commonwealth agency, nor does the proposed development affect any matters of national significance. An assessment against the EPBC Act checklist is provided at Table 7.2 of the REF.

The amended proposal does not trigger any additional aspects of the EPBC Act.

An assessment of the proposal and the amended proposal against the EPBC Act checklist is provided at **Section 6.1**.

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. HI 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 (1) of the EP&A Regulation states that when considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the environmental factors guidelines that apply to the activity. The Department of Planning & Environment's *Guidelines for Division 5.1 Assessments* (the Guidelines) apply to the activity and **Section 6.1** of this report specifically responds to the factors listed in those Guidelines.

Table 9 of the REF demonstrated the effect of the proposed activity on the matters listed for consideration in sub-section 3 of section 5.5 of the EP&A Act. **Table 7** below identifies any altered impacts identified as part of the amended proposal.

Table 7 Matters for Consideration under Sub-Section 3, Section 5.5 of the EP&A Act

Matter for Consideration	Impacts of Amended Activity (altered from the Proposal)
Sub-section 3: Without limiting subsection 1, a determining authority shall consider the effect of any activity on any wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.	Nil

Note: If a biobanking statement has been issued in respect of a development under Part 7A of the *Threatened Species Conservation Act 1995*, the determining authority is not required to consider the impact of the activity on biodiversity values.

4.4 Environmental Planning and Assessment Regulation 2021

DPE's *Guidelines for Division 5.1 Assessments* 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 were considered in section 7 of the REF for the proposal and are further considered (as relevant) for the amended proposal at section 7.1 of this Addendum REF.

4.5 Other NSW Legislation

Sections 4.4, 4.5 and 4.6 of the REF outlined the relevant Commonwealth, State and local legislative requirements that applied to the proposed Activity. There is no change to these requirements or additional considerations as a result of the amended Activity.

5. Consultation

Section 5 of the REF provides a summary of the consultation undertaken for the proposal.

The endorsed REF was notified for 21 calendar days to the stakeholders outlined in **Table 8** below. Additional consultation requirements for the amended proposal, as part of this Addendum REF, is discussed below.

Table 8 Agencies and Stakeholders Notified – Endorsed REF

Stakeholder	Relevant Section
Gunnedah Shire Council	Section 2.130(1), Section 2.45(1) and Section 2.62(2)
Adjoining occupiers	Section 2.62(2)

The above-mentioned notification commenced on 13 July 2023. Copies of the notification letters, as well as responses received, were provided as appendices to the endorsed REF.

5.1.1 Additional Consultation

Two additional “Connecting with Country” consultation sessions have been held in 2024 to discuss the overall design of the hospital and the signage and wayfinding graphics and language. These sessions informed the updated Wayfinding and Signage reports that were provided with REF Addendum 1.

In relation to the amended architectural and landscape architectural design and the amended tree removal, there is no statutory notification required in accordance with the T&ISEPP for the following reasons:

- There will be no effect on Council related infrastructure or services.
- There will be no change in or increase to flood impacts as a result of the amended proposal.
- The site is not within the coastal zone.
- The proposed amendment does not trigger any of the consultation requirements of section 2.15 of the T&ISEPP.

6. Environmental Impact Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

The relevant assessment considerations under the *Guidelines for Division 5.1 Assessments* (June 2022) apply to the activity and are provided below. A comparison of the impacts of the proposal and the amended proposal have been provided in **Table 9** below.

Table 9 Summary of Environmental Factors Reviewed in Relation to the Activity

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
a) Any environmental impact on a community	There will be no increase in the short or long-term impacts as a result of the amended proposal.	-ve		
		Nil		✓
Does the proposal have any natural or man-made impact on the Health Service Facility, or the broader residential or business community?		+ve	✓	
b) Transformation of a locality	The hospital redevelopment represents a moderate visual transformation to the community. The amended proposal will not significantly alter the nature of the locality.	-ve		
		Nil		✓
Prompt only: Does the proposal significantly change the nature of the locality?		+ve	✓	
c) Any environmental impact on the ecosystem of the locality	Nil	-ve		
		Nil	✓	✓
Prompt only: Does the proposal impact on the ecosystem that is relevant to the immediate area? (i.e., the system between natural and man-made environment)		+ve		
d) Any reduction of the aesthetic, recreational, scientific, or other environmental quality or value of a locality.	Nil	-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.	Nil	-ve		
		Nil	✓	✓
		+ve		
f) Any impact on the habitat of protected fauna (within the meaning of the <i>National Parks and Wildlife Act 1974</i>)	Nil	-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	Nil	-ve		
		Nil		✓
		+ve	✓	

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
h) Any long-term impacts on the environment Prompt only: Does the natural of the proposal result in a long-term or permanent impact on the natural or man-made environment?	Nil	-ve		
		Nil	✓	✓
		+ve		
i) Any degradation of the quality of the environment Prompt only: Does the proposal reduce the quality of the natural environment?	Nil	-ve		
		Nil	✓	✓
		+ve		
j) Any risk of safety of the environment	Nil	-ve		
		Nil	✓	✓
		+ve		
k) Any reduction in the range of beneficial uses of the environment	Nil	-ve		
		Nil	✓	✓
		+ve		
l) Any pollution of the environment	Nil	-ve		
		Nil	✓	✓
		+ve		
m) Any environmental problems associated with the disposal of waste	Nil	-ve		
		Nil	✓	✓
		+ve		
n) Any increased demanded on resources (natural or otherwise) that are, or are likely to become, in short supply	Nil	-ve		
		Nil	✓	✓
		+ve		
o) Any cumulative environmental effects with other existing or likely future activities.	Nil	-ve		
		Nil	✓	✓
		+ve		
p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions.	Nil	-ve		
		Nil	✓	✓
		+ve		
q) applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1,	New England North West Regional Plan 2036. The redevelopment of the Gunnedah hospital supports Gunnedah as a strategic centre in the region. The proposed modifications do not impact on the benefits that the redevelopment will provide.	-ve		
		Nil		✓
		+ve	✓	

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
r) Any other relevant environmental factors,	Nil	-ve		
		Nil	✓	✓
		+ve		

6.2 Summary of Impacts

The approved Review of Environmental Factors provided a comprehensive environmental impact of the following issues:

- Traffic, access and parking
- Noise and vibration
- Air quality and energy
- Soils and geology
- Coastal risks
- Hydrology, flooding and water quality
- Visual amenity
- Aboriginal heritage
- Non-Aboriginal heritage
- Ecology
- Bushfire
- Land uses and services
- Waste generation
- Hazardous materials and contamination
- Sustainability and climate resilience
- Community impact/ social impact
- Cumulative impact.

The proposed modifications presented in this amended proposal do not result any significant change to those assessments that have been carried out. The modifications are very minor and are largely a natural consequence of detailed design development. An assessment of the impacts of the modifications is provided in **Table 10** below.

Table 10 Summary of Impacts Relating to the Modified Activity

Issue	Discussion
Traffic, access and parking	No change
Noise and vibration	No change
Air quality and energy	No change
Soils and geology	No change

Issue	Discussion
Coastal risks	No change
Hydrology, flooding and water quality	The modifications to the stormwater management plan will not change the impact of the development on hydrology, flooding or water quality.
Visual amenity	<p>The proposed redesign of the fire plant and medical gas plant is minor in nature and will not increase the level of visual impact from that of the approved design shown in REF Addendum 1.</p> <p>The loss of eight trees from the Marquis Street frontage of the site will have a visual impact, particularly Tree 8 which is a medium sized and well-established River Red Gum.</p>
Aboriginal heritage	No change
Non-Aboriginal heritage	No change
Ecology	<p>The modified Activity entails removing eight additional trees, being Tree 7, 8, 11, 12, 13, 14, 15 and 17. All of these trees are native species except tree 17 which is exotic. However they are not remnant trees or endemic species. None of these trees contain tree hollows.</p> <p>The Biodiversity Assessment Report prepared for the Gunnedah Hospital Redevelopment (GeoLINK, 14/06/2023) identified that these trees provide marginal habitat and foraging resources for locally occurring avifauna, arboreal mammals, microbats and flying-foxes. Due to limited connectivity, these trees are likely only utilised by highly mobile species (i.e. birds) or species which are well adapted to disturbed environments.</p> <p>GeoLINK originally concluded that the impact of the development was not sufficient enough to result in a significant impact to threatened species. The removal of the additional eight trees would not change the conclusion of the Biodiversity Assessment Report.</p> <p>The modification to Mitigation Measure 10 reduces the amount of compensatory tree planting. This will reduce the provision of new habitat and foraging resources, however the replanting ratio will still be a minimum 1:1 replacement ration, which is HI's usual requirement. Furthermore, the landscape design includes mass plantings of shrubs and grasses, which will provide habitat and foraging resources.</p>
Bushfire	No change
Land uses and services	No change
Waste generation	No change
Hazardous materials and contamination	No change
Sustainability and climate resilience	No change
Community impact/ social impact	No change
Cumulative impact.	No change

7. Summary of Mitigation Measures

This REF Addendum 2 seeks an amendment to Mitigation Measure 10 to:

- Require tree removal to be compensated by replacement trees at a minimum 1:1 replacement ratio;
- remove the requirement for these trees to be native to the region.

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 amended proposal, 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;
- these identified impacts do not vary from those presented with the REF. Where these impacts vary changes to mitigation measures have been proposed;
- 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 amended proposal to redevelop the Gunnedah Hospital is subject to assessment under Part 5 of the EP&A Act. An REF for the redevelopment of the hospital was endorsed by HI on 22 September 2023. An Addendum to the endorsed REF was endorsed by HI on 11 July 2024. The proposed changes to the architectural and landscape architectural design, the increase in tree removal and modification to a mitigation measure are required as a direct result of the works being undertaken for the hospital redevelopment. This Addendum REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the amended proposed activity.

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

As outlined in this Addendum REF, the amended 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 considered all potential impacts (changed from those identified within the REF) and has minimal environmental impacts; and
- adequate mitigation measures have been proposed to address these impacts.

All matters affecting, or likely to affect, the environment by reason of the amended proposed activity have been examined by the Addendum REF in the context of the Department of Planning & Environment's (DPE) *Guidelines for Division 5.1 Assessments*, consistent with section 171(1) of the *Environmental Planning and Assessment Regulation 2021* and the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999*. As outlined in the Addendum REF, the amended proposal is a minor variation which will not result in any significant or long-term impact.

The proposed activity is not within in a declared area of outstanding biodiversity value and is not likely to significantly affect threatened species, populations or ecological communities, or their habitats or impact biodiversity values, meaning a SIS and/ or BDAR is not required. The environmental impacts of the amended proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Division 5.1 of the EP&A Act. On this basis, it is recommended that HI determine the proposed activity in accordance with Division 5.1 of the EP&A Act and subject to the adoption and implementation of any mitigation measures identified within this report.