

21 November 2024

Claire Muir  
Senior Planning Advisor  
Development and Commercial  
Health Infrastructure  
1 Reserve Road  
St Leonards NSW 2065

Dear Claire,

**RE: REF 19/2023  
WENTWORTH HEALTH SERVICE REDEVELOPMENT PROJECT  
ADDENDUM #1 TO APPROVED REF**

### **1.0 PURPOSE AND BACKGROUND**

This letter serves as Addendum #1 to the approved Wentworth Health Service Redevelopment REF (REF 19/2023). REF 19/2023 was approved by HI on 13 October 2023.

The approved REF provides for the staged redevelopment of the existing hospital involving:

- Construction and operation of a new single-storey health services facility, including a 19-bed In-Patient Unit (IPU) plus 1 HiTH or virtual bed (equating to a 20-bed facility), associated out-patient and community health services, and urgent care centre;
- Three new staff accommodation buildings;
- Demolition of the main existing hospital building and other ancillary buildings; and
- Associated civil engineering works including retaining the existing levee bank but building the site up to the levee bank's height; as well as tree removal; and new landscaping.

The REF is subject to the range of mitigation measures, including stamped approved architectural and landscape drawings, and restrictions upon construction hours.

Following approval of the REF, HPAC Pty Ltd has been engaged to deliver the works and construction has commenced and is ongoing. As construction has continued it has become apparent that some minor changes to the approved development are likely to be necessitated. This extends to two (2) very minor changes to the development's design, as well as for a minor extension to the proposed Saturday construction hours only.

Relevantly, the works remaining are broken into two phases:

- Milestone 1A – Construction of the new hospital building and its internal fit out, along with external works involving landscaping and the new car park areas; and
- Milestone 1B – The demolition of the existing hospital building upon completion of the new building, and other associated civil engineering works to upgrade the hospital access road and provide for the hospital's ambulance canopy.

This REF Addendum considers the environmental impacts of the proposed changes, including considering if these are lesser than the original impacts (or improve upon already-assessed impacts), as well as whether the original conclusions regarding the need for an Environmental Impact Statement (EIS), Biodiversity Development Assessment Report (BDAR), or Species Impact Statement (SIS) are maintained.

## 2.0 PROPOSAL

### 2.1 Design Refinements

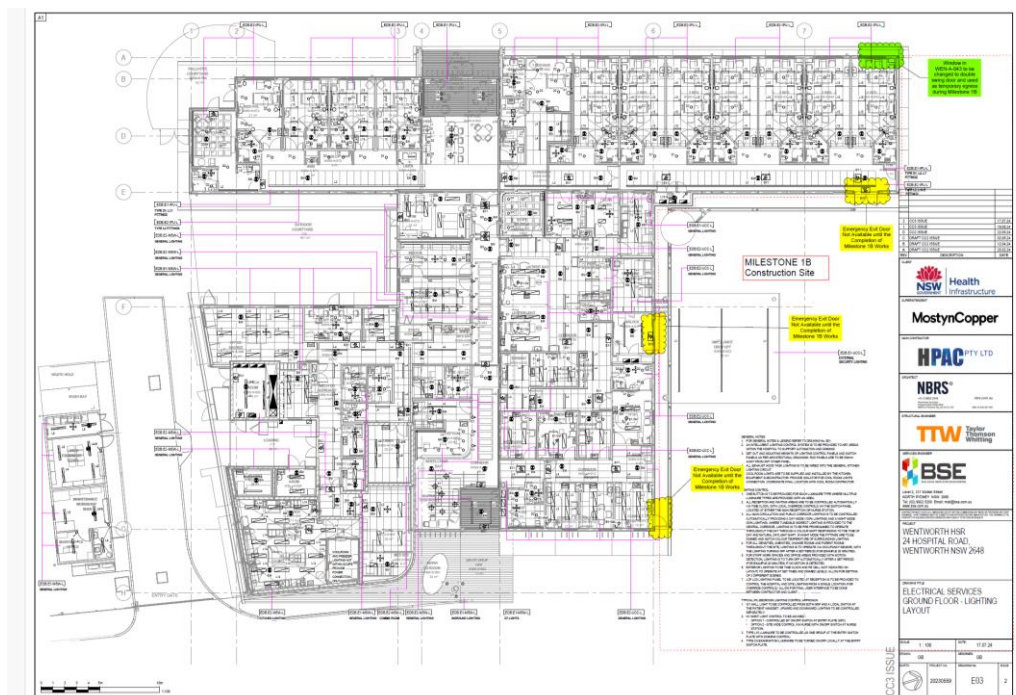
The identified minor design changes include:

- Introduction of a double-swinging glazed door within bedroom suite WEN-A-043 to replace a window in the same location and to initially and temporarily provide for BCA compliant fire egress whilst both the new and old buildings abut each other preventing the final egress arrangements to be employed. The door will ultimately be retained instead of the window.
- Erection of an awning / canopy addition to the approved maintenance shed to assist with mitigating oil and rain water entering the Council sewer system in proximity of the maintenance shed, following consultation with Council. As the proposed awning is marginally greater than 20m<sup>2</sup> in area and more than 2.4m above existing ground level, it cannot qualify as Exempt Development and therefore requires a form of planning approval. This REF addendum presents itself as the appropriate vehicle in this instance.

These two refinements / changes are shown in **Figures 1 to 3**. These design refinements necessitate revision of the approved stamped architectural drawing set.



**Figure 1 – Extract of elevation of proposed change to bedroom suite WEN-A-043 to replace a window with a double-swinging glazed door – as clouded (NBRS)**



**Figure 2 – Mark-up (in green) of the proposed change to bedroom suite WEN-A-043 to replace a window with a permanent double-swinging glazed door (NBRS)**

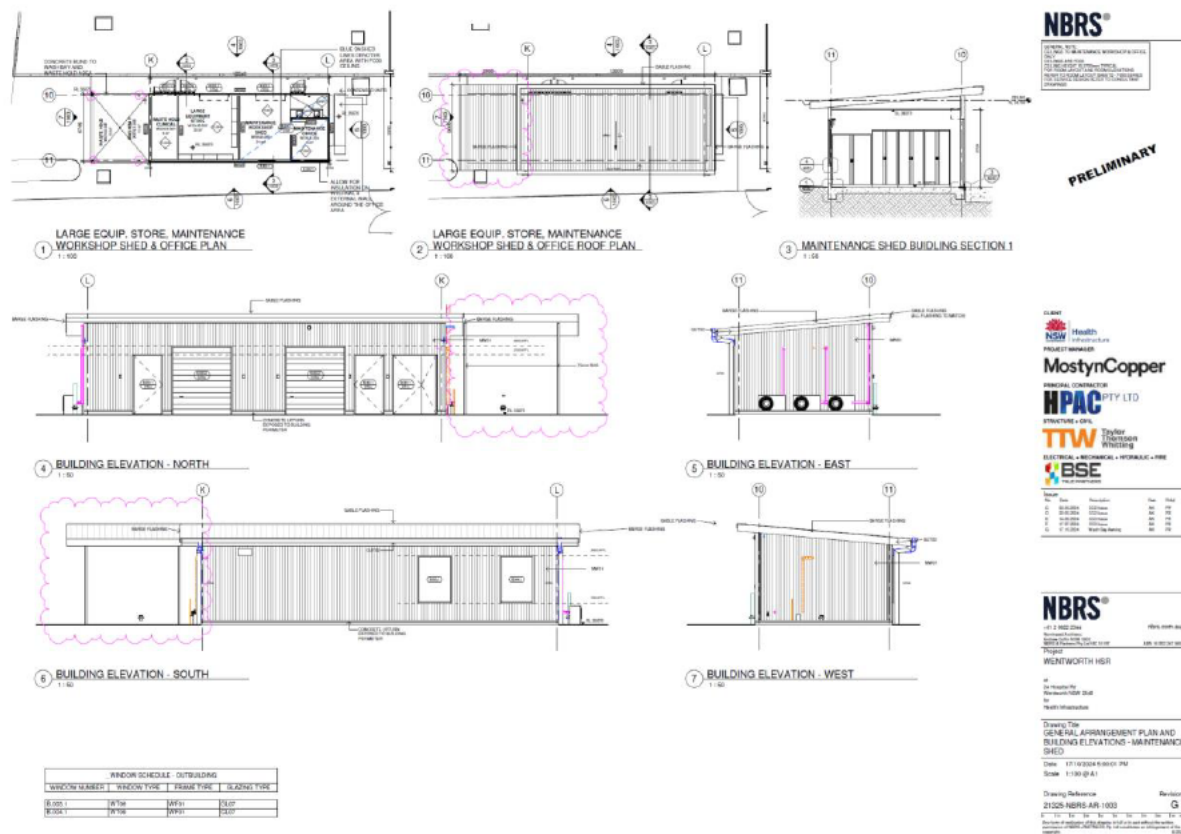


Figure 3 – Proposed new awning / canopy on approved maintenance shed (NBRS)

The proposed changes are reflected in **Appendix A** (revised architectural plans / drawings for approval).

## 2.2 Mitigation Measure 2 Refinements – Design changes

Accordingly, the revised Mitigation Measure '2 – Development in Accordance with Plans and Documentation' would read as follows, with new text ***bolded in italics*** and text to be deleted shown ~~struck through~~.

### 2 Development in Accordance with Plans and Documentation

The proposal must be carried out generally in accordance with the Review of Environmental Factors dated 7 September 2023 and prepared by \_planning Pty Ltd on behalf of NSW Health Infrastructure (including accompanying Appendices A - X), ***the REF addendum #1 letter dated 21 November 2024 and its attachments***, and generally in accordance with the following plans/documentation as modified below and by any of the under-mentioned measures:

Drawing Title	Drawing Ref	Revision	Date	Prepared by
Cover	21325-NBRS-AR-REF-0000	2	03.04.2023	NBRS
External Finishes Board	21325-NBRS-AR-REF-0005	2	03.04.2023	NBRS
Location Plan	21325-NBRS-AR-REF-0020	2	03.04.2023	NBRS
Site Plan	21325-NBRS-AR-REF-0202	7	03.04.2023	NBRS

Demolition Plan - STAGE 1A	21325-NBRS-AR-REF- 2 0203	27.04.2023	NBRS
Demolition Plan - STAGE 1B	21325-NBRS-AR-REF- 2 0204	03.04.2023	NBRS
Site Sections	21325-NBRS-AR-REF- 5 0210	03.04.2023	NBRS
General Arrangement Plan – Ground	21325-NBRS-AR-REF- 5- <b>J</b> 1000	<b>17.10.2024</b>	NBRS
General Arrangement Plan – Roof	21325-NBRS-AR-REF- 2 1000	03.04.2023	NBRS
<b>General Arrangement Plan and Building Elevations – Maintenance Shed</b>	<b>21325-NBRS-AR- G 1003</b>	<b>17.10.2024</b>	<b>NBRS</b>
External Elevations	21325-NBRS-AR-REF- 5 3000	03.04.2023	NBRS
<b>External Elevations – Sheet 1</b>	<b>21325-NBRS-AR- I 3000</b>	<b>17.10.2024</b>	<b>NBRS</b>
Sections	21325-NBRS-AR-REF- 2 4000	03.04.2023	NBRS
Cover Sheet	21325-NBRS-LS-DD- 2 REF-1000	14.04.2023	NBRS
Legend	21325-NBRS-LS-DD- 2 REF-1001	14.04.2023	NBRS
GENERAL ARRANGEMENT PLAN - MILESTONE 1A	21325-NBRS-LS-DD- 2 REF-1201	14.04.2023	NBRS
GENERAL ARRANGEMENT PLAN - MILESTONE 1B	21325-NBRS-LS-DD- 2 REF-1202	14.04.2023	NBRS
GENERAL ARRANGEMENT PLAN - STAGE 2	21325-NBRS-LS-DD- REF-	14.04.2023	NBRS
Planting Plan – Milestone 1A	21325-NBRS-LS-DD- 2 REF- 1601	14.04.2023	NBRS
Planting Plan – Milestone 1B	21325-NBRS-LS-DD- 2 REF- 1602	14.04.2023	NBRS
Planting Plan – Stage 2	21325-NBRS-LS-DD- 3 REF- 1603	14.04.2023	NBRS
Tree Planting Plan – Milestone 1A & 1B	21325-NBRS-LS-DD- 2 REF- 1701	14.04.2023	NBRS
Tree Removal Plan	21325-NBRS-LS-DD- 3 REF- 1801	01.05.2023	NBRS
Tree Retention Plan	21325-NBRS-LS-DD- 2 REF- 1802	14.04.2023	NBRS
Staff Accommodation details	Pages 1-15	28.05.2022	Coolibah Cabins

### 2.3 Mitigation Measure 52 Refinements - Revised Saturday Construction Hours

The requested extension of Saturday construction hours involves:

- Extending the proposed construction hours on Saturdays only for the remainder of the works from the approved 8:00am to 1:00pm to the proposed 7:00am to 5:00pm. Note: Milestone

1A external works and Milestone 1B civil works are not proposed for Saturdays generally, and do not require extended hours, notwithstanding any extension of hours, these works would likely be carried out within the 8:00am to 1:00pm time span if carried out on any Saturday.

- The focus of the extended hours is the internal works within Milestone 1A where additional Saturday work will save three (3) weeks in the fit out (and overall) program and help alleviate impacts upon the operational hospital. To date Mitigation Measure 52.4 has been employed numerous times by HPAC to carry out internal works under Milestone 1A, gaining hospital and or LHD support to do so, however the objective on this occasion is to secure a comprehensive REF-based approval in lieu of the previously applied piecemeal approach. It is understood that the LHD and hospital is supportive of this new approach.

This will reduce the level, and duration, of disruptions to the operational hospital, particularly those works carried out within or near a live environment.

As noted, Mitigation measure 52.4 allows for some flexibility on a case by case basis, however, in this instance as the refined hours are a comprehensive extension of hours for the entirety of the Milestone 1A internal works, they require consideration via an addendum process.

This impacts Mitigation Measure 52 – ‘Restriction on Hours during Construction’ which would now read as follows with new text ***bolded in italics*** and text to be deleted shown ~~struck through~~. The change arising primarily relates to Mitigation Measure 52.1. No change is required or proposed to the balance of existing text in, or requirements of, Mitigation Measure 52, however Koikas Acoustics Pty Ltd in considering works outside of the standard hours has recommended further measures, which are added as new Mitigation Measures as set out below. See also the assessment section herein.

## 52 Restriction on Hours during Construction

52.1 The undertaking of any construction activity on the subject site is to be limited to the following hours:

- Monday to Friday inclusive: 7.00am to 6.00pm;
- Saturdays: ~~8:00am~~ ***7:00am*** to ~~1:00pm~~ ***5:00pm***; and
- Sundays and Public Holidays: No work permitted.

***Only Milestone 1A internal works shall benefit from the extended Saturday hours. No Milestone 1A external works or Milestone 1B works shall be carried out within the extended hours. These works shall rely upon the standard hours of 8:00am to 1:00pm.***

52.2 Entry and departure of vehicles from the site will be restricted to the imposed work hours.

52.3 Activities may be undertaken outside of hours in measures 52.1 and 52.2 if required:

- By the police or a public authority for the delivery of vehicles, plant or materials; or
- In an emergency to avoid the loss of life, damage to property or to prevent environmental harm.

52.4 Where the works are inaudible at the nearest sensitive receiver, a disruption notice has been issued by the relevant Local Area Health District (LHD) or hospital and a letter of support has been provided from the relevant LHD or hospital for the Out of Hours Works.

52.5 Consideration will be given to extending these hours to allow for specific work tasks on a case by case basis, subject to approval from HI being sought prior to this occurring and the assessment of any impact of this extension.



- 52.6** *With respect to the extended Saturday hours from 7:00am to 8:00am and from 1:00pm to 5:00pm, a letter box drop shall be carried out to advise neighbouring receivers of the updated work hours and to provide contact information for complaints or additional information. This shall be carried out ahead of the first use of extended hours.*
- 52.7** *Attended Noise Monitoring shall be considered by the contractor in order to verify noise levels in accordance with the approved Stantec Operational & Construction Noise Impact Assessment dated 23 April 2023, and the REF addendum's Acoustical Report prepared by Koikas Acoustics Pty Ltd dated 13 October 2024, where predictions are 20 dBA or more above the Noise Management Levels (NMLs).*

### 3.0 ASSESSMENT

#### 3.1 Design impacts

Based on the abovementioned design changes to remove a single window and replace it permanently with a double-swinging glazed door (initially operating as an interim fire escape) as well as the addition of an awning / canopy attached to the maintenance shed, this Addendum REF is both minimal and in part administrative in nature. It does not materially affect the approved project or works in any other way than adjusting the new buildings to meet temporary and permanent needs of the development.

The new awning / canopy is about 24m<sup>2</sup> in area with a maximum height of just over 3.0m. Accordingly it is a 'near-miss' Exempt Development in both area and height.

Despite this, no new or different impacts arise, including overshadowing, visual, or view impacts to properties outside of the site. Design excellence or design quality is not diminished and in general the changes result in a net neutral environmental planning impact. The awning / canopy complements the use of the maintenance shed. The proposal has been suggested by Council to seek to protect water quality and mitigate run-off impacts into its sewer system during rain events. The awning / canopy will limit stormwater run-off from areas adjacent to the maintenance sheds access apron and is a positive inclusion to the redevelopment in this context.

#### 3.2 Construction Hours / Noise and Vibration Impacts

The proposed additional Saturday construction hours are outside of standard hours and are classified as 'Out of Hours Works (OOHW) Period 1 – Day' hours as demonstrated in **Figure 4** over and based on the 'Out of Hours Works Protocol and application requirements for HI Projects' (dated 27 April 2022). This is founded on the NSW Interim Construction Noise Guidelines (ICNG) (DECC 2009), noting the ICNG recommended standard hours are not mandatory and more or less stringent construction hours may be approved by the relevant consent authority.

The additional hours are shown bounded in red in **Figure 4** and could be considered as the most acceptable extension of construction hours in the context of its minor deviation from the standard hours, and the lack of application of any Sunday or public holiday hours, or the more sensitive 'OOHW Period 1 – Evening' hours, or the most sensitive OOHW Period 2 hours. Further, the extended hours only relate to existing internal works, which are also generally inaudible to the nearest sensitive neighbours who are some 290m to the north-west over the Darling River and 400m to the north-east over Tuckers Creek, a tributary into the Darling River north of the hospital land.

Hour commencing	12 AM	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM
Monday																								
Tuesday																								
Wednesday																								
Thursday																								
Friday																								
Saturday																								
Sunday																								
Public Holiday																								

Figure 4 - Construction Hours - Out of Hours Works – Protocol and application requirements for HI Projects (HI)

The justification for the minor extension of hours is founded upon:

- Minimising the impact on existing hospital operations during core business hours.
- Aiming to reduce the overall construction period by three (3) weeks in relation to Milestone 1A internal works only.
- Reducing impacts upon ongoing operation of the hospital during works, by reducing the construction period.
- Replacing the piecemeal / case-by case approach to dealing with OOHW (under Mitigation Measure 52.4) with a comprehensive measure. HPAC advises that the Mitigation Measure has been employed numerous times and a single simple way of confirming OOHW is now preferred to avoid ongoing approaches to, and support from, the LHD / hospital.

Koikas Acoustics Pty Ltd has considered / assessed the likely impacts of works during the extended Saturdays hours and broadly concluded that:

- The internal works to complete the new building's fit out during Milestone 1A will be inaudible to the nearest sensitive receivers and extending the Saturday hours will be of little consequence and be indiscernible in their execution from that of the approved Saturday hours. The beneficiaries of the reduced duration of the works, the hospital, will be marginally affected by some additional noise.
- Whilst extended hours are not proposed to apply to the external works under Milestone 1A or the Milestone 1B works, the construction noise likely to be generated using typical plant and equipment will exceed the Noise Management Level (of 42 dBA) in most to all scenarios at the nearest sensitive receivers, but be well below the 75 dBA level of Highly Noise Affected. This does not differ from the original assessment and existing mitigation measures continue to apply.
- Notwithstanding, in the event of external Milestone 1A and Milestone 1B works within the extended Saturday hours – most likely only after 1:00pm, Koikas has recommended additional mitigation measures to address the lower thresholds related to the extended Saturdays hours. These relate to:
  - Limiting noisy activities to standard hours.
  - Use of quieter equipment.
  - Use of barriers and enclosures to contain noise.
  - Letter box drops to advise nearby sensitive receivers of the revised hours of construction and to provide contact information for complaints or additional information; the establishment of complaints handling process; and periodic review of that process.
  - Consideration of Attended Noise Monitoring in order to verify noise levels in accordance with the previous Stantec, and current Koikas, assessments.
  - Restriction on activities likely to generate high (or offensive) levels of noise to nearby residential receivers and prohibition of certain activities being undertaken within the extended Saturdays hours.

As per the original findings of the REF's noise and vibration assessment, the list of plant and activities are not expected to generate vibration levels exceeding relevant criteria at any sensitive external receiver. Ground borne noise from the likely construction activities is not anticipated to be audible above airborne noise inside residential receivers, and will not require specific controls.

Based on the above, generally, the noise impacts remain the same, and the ability to limit additional noise impacts upon residential receivers will be able to be managed to current and approved levels by limiting the types of works able to be carried out during extended hours. To that end, the proposal serves to improve the likely impacts of the works by enabling a prompter conclusion of the works, including works with noise impacts.

## CONCLUSION

It is requested that HI consider and approve the proposed refined design and expanded construction hours, on the basis of the justifications and assessment set out above.

The addendum maintains the conclusions reached in the approved REF, including that no EIS, BDAR or SIS is required in relation to the project. The changes are minor and manageable in their context and the impacts are at worst net neutral from a design perspective and in part lessen the originally assessed noise impacts (or improve upon already-assessed impacts) by reducing the duration of works across all construction hours likely to impart noise impacts, and otherwise preventing noisy works during the proposed extended Saturdays hours. The new awning / canopy provides for improved environmental outcomes (as requested by Council) to seek to prevent or reduce the likelihood of rainwater and oils entering and mixing with the adjacent Council sewer system.

Should you have any questions or seek further information please don't hesitate to contact me on 0437 259 581 or at [oliverklein1968@gmail.com](mailto:oliverklein1968@gmail.com).

Yours Sincerely



Oliver Klein  
Director  
\_planning Pty Ltd

## Appendices:

- A - Revised architectural drawing sheets for approval (NBRS)
- B - Noise and Vibration Assessment addendum letter (Koikas Acoustics Pty Ltd)