

# Review of Environmental Factors – Response to Submissions & REF Update Report

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Albury Wodonga Regional Hospital Project – Construction of a New Northeast Building (NEB), Temporary at-grade Northwest Carpark, and Associated Works

Version 7

**23 July 2025**

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**D - Revised NW Additional Parking Plan (Drawing AWH-HSL-AR-EW-NEB 03-SKE-00022 Rev.D)**

**E - Traffic Statement**

**F - Revised Civil Works Plan**

**G - Ecology Statement**

**H - Preliminary Traffic Management Plan**

## Document Management, Tracking and Revision History

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V1 Draft	18 June 2025	C. Cadman	Submissions Report	P. Hemphill	P. Hemphill
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V3 Draft	30 June 2025	P. Hemphill	Submissions Report	-	P. Hemphill
V4 Draft	7 July 2025	P. Hemphill	Submissions Report	T. Moore	P. Hemphill
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V6 HI Draft	16 July 2025	K. Saunders	Submissions Report	C Muir	C Muir
V7 HI Final	23 July 2025	K. Saunders	Submissions Report	C Muir	C Muir

# 1 Introduction

This Submissions and Review of Environmental Factors (REF) Update Report has been prepared in response to the Notification and Exhibition of NSW Health Infrastructure's REF associated with the proposed Northeast Building (NEB), temporary northwest car park and associated works to Albury Wodonga Regional Hospital at 201 Borella Road, East Albury NSW 2640 (Lot 14 DP 1175382).

As detailed within the REF dated 23 April 2025, the proposal comprises the following:

- Site preparation works, including:
  - Demolition of existing hard stand areas, pedestrian infrastructure, and 41 car parking spaces of the existing lower staff at-grade carpark (Car Park A);
  - Tree removal; and
  - Relocation of existing fire hydrant and inground services diversions.
- Construction of a new two (2) storey Northeast Building including administration, outpatient clinics, education training and research, and pharmacy departments, with new bridge connection to the Level 02 corridor of the adjacent existing building (surgical wards and operating theatres (at public entry level));
- Construction of a new at-grade temporary car park with 39 spaces to the northwest of the Hospital Campus;
- Make good the interface to the existing building, and surrounding pedestrian paths and line marking;
- Installation of wayfinding signage; and
- New tree planting and landscaping works.

This proposal is the first of four stages to the hospital's overall redevelopment. Stages one to four are as follows:

- Stage 1: Construction of the Northeast Building, temporary northwest car park and associated works.
- Stage 2: Early Works, involving demolition of the Allied Health Building and adjoining facilities, new formalised verge parking delivering 216 car spaces, and landscaping works.
- Stage 3: Construction of the Clinical Services Building, along with ancillary works and landscaping.
- Stage 4: Refurbishment works, including Emergency Department expansion and new at-grade parking.

This Report is prepared to review and consider formal submissions received by Health Infrastructure (HI) as part of the statutory notification and exhibition process undertaken in relation to the Northeast Building REF.

The REF was exhibited for 28 days from Friday 9 May 2025 to Friday 6 June 2025. Concurrent written notification was also provided to:

- Nearby owners and occupiers;

- Albury City Council;
- City of Wodonga Council; and
- NSW Rural Fire Services (RFS).

A total of 103 public submissions were received from 99 submitters, and a further submission from Transport for NSW (TfNSW), RFS and a submission each from Albury City Council, City of Wodonga Council & Towong Shire Council. The principal matters raised in submissions relate to the following:

- Design site suitability of the health facility and the need for a greenfield site;
- Engagement with clinicians and the community;
- Car parking and parking traffic impacts;
- Construction impacts;
- Biodiversity; and
- Design and Visual Impact.

This Submissions and REF Update Report has been prepared having regard to the following:

- *Guidelines for Division 5.1 Assessments* (DPE June 2022);
- *Guidelines for Division 5.1 Assessments – Consideration of environmental factors for health services facilities and schools* (DPHI, October 2024);
- *Community Participation Plan* (CPP) (HI, October 2024);
- *Stakeholder and Community Participation Plan for New Health Services Facilities and Schools* (DPHI, October 2024); and
- *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP).

This Report is accompanied by the following Appendices:

- A. Revised Mitigation Measures, HI, July 2025;
- B. Revised Site Plan (Drawing AWH-HSL-AR-EW-NEB 03-SKE-00002 Rev.E), Hassell, June 2025;
- C. Revised Demolition Plan (Drawing AWH-HSL-AR-EW-NEB 03-SKE-00010 Rev.G), Hassell, July 2025;
- D. Revised NW Additional Parking Plan (Drawing AWH-HSL-AR-EW-NEB 03-SKE-00022 Rev.D), Hassell, June 2025;
- E. Traffic Statement, SCT Consulting, June 2025
- F. Revised Civil Works Plan, Enstruct, June 2025
- G. Ecology Statement, Abel Ecology, June 2025
- H. Preliminary Traffic Management Plan, July 2025

This Report should be read in conjunction with the REF for the Northeast Building, dated 23 April 2025 and the HI Communications and Engagement Report, dated 20 January 2025.

## 2 Public Exhibition and Notification

The TI SEPP requires that the public authority, being HI, be satisfied that appropriate consultation has been undertaken having regard to –

- *The Stakeholder Community Participation Plan for New Health Facilities and Schools (SCPP)* (DPHI, October 2024); and
- *Community Consultation Plan (CPP)* (HI, October 2024).

Further, the TI SEPP also include requirements to provide written notice to the Council for the area and to owners and occupiers of any adjoining land.

### 2.1 How we consulted

Having regard to the level of potential environmental impact from the planned activity, including impacts on surrounding properties and the broader community and the anticipated level of community interest, the REF was publicly exhibited for a period of 28-days between 9 May 2025 until 6 June 2025.

The notification and public exhibition package included provision of written notice to stakeholders of the exhibition of the REF, the site location, exhibition dates and information on how to make a submission, a link to enable access to feedback forms and further project details.

The consultation, exhibition and notification process involved the following:



- 1131 letters issued to occupiers via letter box drop
- 483 additional letters posted to owners who are not occupiers



Around 60 people attended four ‘in-person’ staff and community sessions over two days in Albury and Wodonga.



The REF was exhibited on the NSW Government’s “Have Your Say” platform which was accessible from HI’s corporate website and the project website.



Written notification letters were issued to:

- Albury City Council;
- City of Wodonga Council; and
- NSW Rural Fire Service.



One-on-one meetings were held with key stakeholders, including:

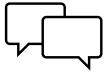
- Albury City Council on 5 May 2025, and
- One meeting jointly attended by Albury City Council, City of Wodonga Council, Indigo Shire Council, Towong Shire Council, Mansfield Shire Council and Better Border Health on 8 May 2025.



Public exhibition project updates were issued via email to all staff and volunteers, councils in the catchment area, campus and neighbouring health and education facilities, including Hilltop Accommodation, UNSW, and the Project Community Advisory Group.



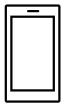
A site notice was placed on the site's boundary fence along East Street.



Project updates were issued via email to 238 subscribers.



Public exhibition and information sessions were promoted through print media advertising, social media posts and staff posters directing people to 'Have Your Say' website to read the documents and lodge a submission.



Significant media coverage generated through media releases issued at the commencement of and during the public exhibition period.

## 2.2 REF Submissions Received

Who we heard from:



103 public submissions from 99 submitters.



One submission each from Albury City Council, City of Wodonga Council and Towong Shire Council.



Two letters of agency advice were received from Transport for NSW (TfNSW) and NSW Rural Fire Service (RFS).

A summary of matters raised in submissions relating to environmental impacts, including consideration of submissions and any recommendations and response are provided at **Section 3** below. The following key matters have been identified:

- Design site suitability of the health facility and the need for a greenfield site;
- Engagement with clinicians and the community;
- Car parking and parking traffic impacts;
- Construction impacts;
- Biodiversity; and
- Design and Visual Impact.

Submissions relating to clinical scope, future stage funding, bed numbers, clinical staffing matters, suggestions to move the hospital to a greenfield site, etc are not matters relating to the environmental impact of the proposed activity and therefore not subject to consideration for the REF. Notwithstanding, a response to these matters is provided where relevant at **Section 3** below.



## 3 Consideration of Submissions

### 3.1 Agency and Local Council Submissions

#### 3.1.1 NSW Rural Fire Service

Submission Points	Response
NSW Rural Fire Service requested the lodgement of a Bush Fire Safety Authority (BSFA) in accordance with 100B(3) of the Rural Fires Act 1997 and outlined the process.	A BSFA approval was issued on 4 June 2025 by NSW Rural Fire Service.

#### 3.1.2 Transport for NSW Submission

Submission Points	Response
Parking spaces on local roads surrounding the site (e.g. Keene Street, East Street) are heavily utilised. Insufficient capacity on streets around the hospital to accommodate construction vehicles.	Mitigation measure B39 which was exhibited with the REF and requires that a Construction Worker Transport Strategy be prepared for the activity.
A survey of street parking utilisation needs to be undertaken to demonstrate that a dedicated parking area for construction vehicles is not required within the site.	A survey of street parking utilisation is not considered to be required at this time, noting that displaced existing staff/visitor parking is accommodated on site.  A Construction Worker Transport Strategy is required to detail the provision of sufficient parking facilities or other travel arrangements for construction workers, to minimise parking impacts on adjacent areas.
The proposed temporary parking area may need to be expanded and constructed as a permanent facility to accommodate parking requirements for the hospital.	A revised North West Additional Parking plan (refer <b>Appendix D</b> ) has been prepared for the activity. Since the exhibition of the REF, and as a result of consideration of submissions, it is now planned to bring forward the construction of an additional seven (7) car parking spaces, bringing the total car parking spaces provide by the proposal to 46 (a net increase of 5 permanent spaces).
The relocation of parking spaces to the proposed temporary carpark will redistribute trips and generate additional trips through the uncontrolled Keene St/Riverina Highway intersection. Consideration needs to be given to potential	Parking displaced by the NEB will be provided elsewhere on the site (with a net increase of 7 spaces). Clinical services currently offered elsewhere on campus are being decanted into the NEB, meaning that there will be limited increase in clinical services offered as part of this REF, and which would result in any significant uplift in parking demand.

improvements to this intersection which may be required as a result.	<p>SCT Consulting have prepared a revised REF Traffic Statement dated 2 July 2025. The report concludes that the impacts of the redevelopment are acceptable, with no intersection improvements recommended.</p> <p>Carpark E and new Temporary Carpark A remain accessible from the controlled intersection at East Street/Borella Road and from the uncontrolled intersections of Borella Road and Keene Street, and Borella Service Road and Keene Street. Any increase in traffic accessing Carpark A via existing uncontrolled intersections will be minor.</p>
Future redevelopment to consider cumulative impacts.	Future redevelopment of the site will consider cumulative traffic and parking impacts at that time.

### 3.1.3 Albury City Council Submission

Submission Points	Response
A Section 68 approval is required to connect to Albury City's water and wastewater infrastructure.	Mitigation measure A7 is included as exhibited (formerly numbered mitigation measure 8) and required that the mitigation measures do not remove any obligation to obtain all other licences, permits and approvals from all relevant authorities as required under any other legislation for the project.
Confirm whether the hospital flows will gravitate to the sewer or be pumped and clarify how this proposed development fits within the total expected water/sewer loads of the overall hospital.	The project's final hydraulic design will accompany a section 68 application.
Council raises matters in relation to the Special Commission of Inquiry into Healthcare Funding.	<p>The REF for Northeast Building (NEB) is informed by extensive consultation with community and in relation to clinical services as detailed in the REF.</p> <p>The NEB redevelopment also considers the Masterplan Report (Hassell 2023). The Report confirmed immediate and long-term capacity for consolidation of services and on-site expansion, to meet the needs of the health service and the broader community into the future. The NEB forms part of a broader vision for consolidation of services and redevelopment of the campus.</p> <p>Refer also to comments at <b>Section 3.2.1.2 and 3.2.1.4</b> below.</p>
The Albury Base Hospital masterplan should be consistent with the <i>2020 Borella Road and Riverina Highway Corridor Strategy</i> .	<p>The NEB development is not in conflict with Albury City's Borella Road and Riverina Highway Corridor Strategy (2020).</p> <p>Road user safety, including pedestrian safety has also been considered. The project has engaged traffic engineers STC Consulting to review traffic impacts associated with the NEB project and their report 'Albury Wodonga Regional Hospital Project, Early Works REF Traffic Statement' has not raised any</p>

	significant impacts. Mitigation measures are also imposed to require the preparation of a Construction Traffic and Pedestrian Management Plan to be prepared in consultation with Council.
The Conditions of Consent for DA10.2021.38711.4 remain unmet.	Refer discussion below under <b>Section 3.2.3.4.</b>
Expedite the construction of the multi-deck car park.	Refer to discussion below under Section 3.2.3. Future redevelopment of the site will consider cumulative parking requirements and impacts.
Signage concerns	All proposed signage will be installed to assist with wayfinding and building identification.
Concerns raised in relation to the SCT Consulting statement dated 23 January 2025, including in relation to background details, benchmarking, no. of spaces, rate calculation, utilisation of on street scapes, temporary parking on site.	The SCT Consulting statement has been revised to address matters raised in submissions including confirming total number of spaces provided, and to include Wagga Wagga Base Hospital in benchmarking analysis.  In relation to parking rate calculation, as the NEB provides for displaced parking and does not introduce significant new services capacity, the redevelopment will not result in the need for significant additional spaces. The DCP parking rates for mixed/office uses are not suitable for application to Health Services Facilities.
Building and carpark design and drainage concerns.	A mitigation measure is included to require, where feasible, greater articulation of elevations.  A revised civil drawing has been prepared for the Northwest Permanent and Temporary Carpark Civil Works Plan. The plan includes drainage and design details.
Concerns regarding detail of Construction Traffic Management Plan (CTMP).	Mitigation measures are included to manage construction impacts via a detail Construction Environmental Management Plan (CEMP) and CTMP with a package of sub plans, hours of construction, construction traffic, safety and operations and construction waste.  A mitigation measure is also included to require a Construction Worker Transport Strategy to be prepared.

### 3.1.4 City of Wodonga Submission

Submission Points	Response
Council raises matters in relation to the Special Commission of Inquiry into Healthcare Funding.	Refer response above in <b>Section 3.1.3.</b>
Access and parking, vehicle and pedestrian safety issues. A multi-	The project's Traffic Statement, prepared by STC Consulting has found that impact resulting from the NEB project is not significant. Displaced parking is provided elsewhere on the

deck carpark should precede the Northeast Building construction. Cumulative impacts.	site with a net increase of 6 spaces. As detailed elsewhere in this Report, mitigation measures are included which will effectively manage pedestrian safety, and which will address the temporary impacts of traffic and parking during construction.
Building and carpark design and drainage concerns & concerns regarding detail of Construction Traffic Management Plan (CTMP).	Refer response provided above at <b>Section 3.1.3</b> .
Impacts of construction on the operating hospital, disruption to patient care, impacts on patient safety and staff.	The project will work with the Albury Hospital to ensure the impacts of construction on operational activities and patients is minimised. REF mitigation measures include the requirement to prepare a Construction Environmental Management Plan (CEMP) and package of sub-plans. Implementation of these plans will mitigate impacts on safety, traffic, parking.

### 3.1.5 Towong Shire Council Submission

Submission Points	Response
Insufficient capacity to meet current and future health service needs of the catchment.	Refer response provided above at <b>Section 3.1.3</b> .
Adverse impacts on patients, staff and clinicians during construction.	As above.
Parking shortfall, pedestrian and road user safety, amenity impacts on adjacent residents.	Mitigation measures are included to manage construction impacts via a detail CEMP and package of sub plans. In relation to parking, refer response at <b>Sections 3.1.2, 3.1.3 &amp; 3.2.3</b> .
Concerns regarding community feedback process.	Refer response provided at <b>Section 3.2.2</b> and elsewhere in this Report.

## 3.2 Public Submissions

### 3.2.1 Site Suitability of the Health Facility

#### 3.2.1.1 Albury Campus Site Location

Submission Points	Response
<p>Concerns regarding the suitability of the site for redevelopment.</p> <p>Concerns as to whether expansion should occur on the existing Albury Wodonga Hospital campus or if it should take place on a new 'greenfield' site.</p>	<p>Announced in October 2022, the Albury Wodonga Regional Hospital project is proposed to be delivered on the existing Albury Wodonga Regional Hospital campus. The Northeast building (NEB) is the first part of the project.</p> <p>Construction of the NEB on a new 'greenfield' site is not within the scope of the proposed development under the REF and as such, the environmental impacts considered do not extend to this matter despite it being raised strongly in submissions.</p> <p>Notwithstanding the above, a Masterplan Report (Hassell 2023), for the site confirmed immediate and long-term capacity for consolidation of services and on-site expansion, to meet the needs of the health service and the broader community into the future. The Masterplan was informed by previous masterplan report (Conrad &amp; Garratt 2021-2022) that involved an assessment of both greenfield and brownfield options.</p> <p>The planned Albury Wodonga Regional Hospital project which includes the NEB, will enable staged construction to commence sooner, will support continuity of care, consolidation of services on a single site, and retention of previous assets and investments.</p> <p>The Hassell Masterplan report (2023) is available to view via NSW Health Infrastructure's Albury Wodonga Regional Hospital project website.</p>

#### 3.2.1.2 Clinical Capacity and Future Demand

Submission Points	Response
<ul style="list-style-type: none"> <li>Concern the Northeast Building delivers an insufficient amount of space to meet the healthcare needs of the community.</li> <li>Concern there will be no increase in clinical servicing, such as the provision of surgical theatres or beds as a result of the Northeast Building.</li> <li>Concern the proposal does not account for the future needs of the surrounding community, especially as the region</li> </ul>	<p>The new NEB will accommodate a variety of uses including administration areas, outpatient clinics, education training and research, pharmacy departments, and will include a link bridge to the Level 02 corridor of the existing surgical wards and operating theatres at the current hospital.</p> <p>The NEB maintains the range of clinical services available in the region and will facilitate the planned stage consolidation of serviced and expansion of facilities in accordance with the adopted Concept Design and Masterplan for the project.</p> <p>Although noted strongly in the submissions received, the suitability and range of clinical services offered as part of the redevelopment of the Albury Wodonga Regional Hospital</p>

continues to experience population growth and an ageing demographic.	<p>project are not an environmental impact associated with the NEB REF.</p> <p>A future planning application for the delivery of the seven-storey Clinical Services Building is anticipated to deliver an increase in bed numbers. In addition, consolidating all complex care to one site including maternity, special care nursery and paediatrics</p> <p>Notwithstanding, the Masterplan and Concept Design report for the site was informed in consultation with Albury Wodonga Health and outlines services located in the future CSB and contemplates the need for expansion overtime and the growing needs of the community.</p>
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### 3.2.1.3 Business Case

Submission Points	Response
The draft proposal was exhibited without an accompanying business case.	<p>Projects are procured and delivered in line with the NSW Government's infrastructure, capital planning and procurement policies and framework available on the NSW Treasury website – <a href="http://www.treasury.nsw.gov.au/information-public-entities/centre-for-economic-evidence/nsw-business-casepolicy-and-guidelines">www.treasury.nsw.gov.au/information-public-entities/centre-for-economic-evidence/nsw-business-casepolicy-and-guidelines</a></p> <p>A strategic business case was completed to support the planning and design process. NSW Health Infrastructure is now progressing the Final Business Case.</p> <p>Delivery of the new Northeast Building early works is consistent with these guidelines.</p> <p>Separately, a summary of the project's Final Business Case will be published on Infrastructure NSW's website. This is expected to occur in early 2026. Further information can also be found under Frequently Asked Questions on the project website.</p> <p>The project's business case is not a planning matter required to be considered by the NEB REF.</p>

### 3.2.1.4 Special Commission of Inquiry into Healthcare Funding

Submission Points	Response
Request that the proposal respond to recommendations of Special Commission of Inquiry into Healthcare Funding.	<p>The Schedule of Recommendations from the Special Commission of Inquiry into Healthcare Funding dated April 2025, is currently being considered by the NSW Government.</p> <p>The recommendations from a special commission of inquiry are not an environmental impact resulting from the NEB proposal and which are required to be assessed by the REF.</p>



## 3.2.2 Engagement with Clinicians and the Community

### 3.2.2.1 Engagement Processes

Submission Points	Response
Concern regarding a perceived lack of genuine engagement with the hospital clinicians and broader community.	<p>Stakeholder engagement related to the Albury Wodonga Regional Hospital project, since its announcement in October 2022, has been comprehensive and extensive.</p> <p>Since project commencement over 100 separate engagement activities have occurred with over 40 different stakeholder groups, reaching approximately 2,200 people.</p> <p>Clinician input has been gained through the establishment of Project User Groups and Working Groups. These groups have played a critical role in shaping the final design of the Northeast Building, drawing on members operational and clinical experience. Extensive engagement has been undertaken with AWH.</p> <p>Engagement has also taken place through a variety of channels to ensure broad community reach and participation. This has included community information sessions, pop-ups, project newsletters, door knocking, and website and social media updates.</p> <p>HI remains committed to transparent, ongoing, and meaningful engagement as the project progresses throughout its next stages.</p> <p>The project's Engagement Report (Appendix Y to the REF) details the internal stakeholder engagement (including clinician input via Project User Groups), the external stakeholder engagement, and the activities of the Project Community Advisory Group.</p> <p>This Submissions and REF Update Report documents statutory engagement for the REF and associated responses at <b>Sections 2 and 2.1</b>.</p>

## 3.2.3 Car Parking

### 3.2.3.1 Reduction in Permanent Car Parking Spaces

Submission Points	Response
<p>Concern regarding the proposal resulting in the reduction of two car parking spaces.</p> <p>Confirmation of car parking to be removed as plans show removal of 58 spaces instead of 41 spaces.</p>	<p>The REF proposed that 41 at-grade parking spaces will be removed to accommodate the new Northeast Building. The REF includes that this loss would be managed through the provision of 39 spaces through the construction of a new temporary at grade carpark with access from Keene Street.</p> <p>Since the exhibition of the REF and as a result of consideration of submissions it is now planned to bring forward the construction of an additional seven (7) car parking spaces</p>

	<p>located at Carpark E, bring the total car parking spaces provide by the proposal to 46 (a net increase of 5 spaces).</p> <p>Plan provided at <b>Appendix E</b> of this report indicates the location of the 46 car parking spaces.</p> <p>Demolition plans exhibited with the REF included that 58 car parking spaces were to be removed, a revised Site Plan (<b>Appendix B</b>) and Demolition Plan (<b>Appendix C</b>) have been prepared and provide clarification that the spaces will be temporarily realigned and reinstated and confirm that the number of spaces to be removed remains at 41.</p> <p>Further stages of the project (not the subject of this REF for Northeast Building) will deliver additional car parking.</p>
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### 3.2.3.2 Queries on Traffic Statement

Submission Points	Response
<ul style="list-style-type: none"> <li>Informal car parking is currently taking place on a dirt area of the site located where the proposed temporary northwest carpark is to be constructed. As a result, there is a discrepancy between the observed on-site parking activity and the parking figures accounted for in the appended Traffic Statement.</li> <li>The proposal has not accounted for or considered its contribution to future traffic growth throughout surrounding roads.</li> <li>No consideration has been made to the impacts the northwest carpark may have on the Keene Street and Riverina Highway intersection.</li> <li>Consideration of cumulative traffic impacts.</li> </ul>	<p>The Traffic Statement prepared by SCT Consulting (Appendix M of the REF) assessed informal parking surrounding the site, concluding the presence of informal parking does not affect the parking demand forecast or the supply calculation.</p> <p>The Traffic Statement includes that formalisation parking will provide a more efficient layout and safer design.</p> <p>This proposal does not result in a net increase in clinical services and therefore negligible operational traffic growth is anticipated. Future traffic growth or demand will be addressed in the subsequent planning proposals that increase clinical services.</p>

### 3.2.3.3 Queries on Car Parking Design

Submission Points	Response
The suitability of northwest carpark gravel surface and stormwater design.	<p>The proposed surface of the northwest carpark is a chip seal not gravel, as noted on drawing titled 'Northwest Permanent and Temporary Carpark – Civil Works Plan' (6393-CV-EW-ENB-2530_Rev T4).</p> <p>The stormwater drainage to the temporary northwest carpark has been designed to utilise the existing site drainage which can accommodate the calculated flows.</p>



**3.2.3.4 ED Parking Strategy (previous DA consent conditions)**

Submission Points	Response
Previous DA consent conditions (DA10.2021.38711.4) require a revised parking strategy for a minimum of 93 car parking spaces to be submitted to Albury City Council by 20 April 2026.	HI have considered the relevant conditions and are currently preparing a response to meet these requirements.

**3.2.4 Construction Activities****3.2.4.1 Construction Dust, Noise and Vibration**

Submission Points	Response
Construction dust, noise and vibration generated by the proposal could potentially disrupt the operating hospital.	<p>Construction dust, noise and vibration can be appropriately managed through standard construction mitigation measures.</p> <p>As described in the Preliminary Construction Management Plan appended to the REF, noise generated by construction activities will be monitored to ensure limits set out in the EPA and Australian Standards are appropriately managed.</p> <p>Any noise generated by plant equipment and/or building services associated with the premises will be managed to ensure they do not give rise to any offensive noises as defined under the provisions of the Interim Construction Noise Guidelines, EPA and Australia Standards.</p> <p>The exhibited mitigation measures include the requirement for a Construction Noise and Vibration Management Plan. This plan will be a part of an overarching Construction Environmental Management Plan required to be prepared by the exhibited mitigation measures, directing the project throughout all construction stages.</p>

**3.2.4.2 Contractor and Subcontractor Parking During Construction**

Submission Points	Response
Construction vehicles are likely to take up car parks within the hospital campus, as well as along the surrounding residential streets, causing an insufficient number of car parks for patients, staff and visitors to utilise.	<p>The exhibited mitigation measures included the requirement to prepare a Construction Worker Transport Strategy. To further address concerns raised in submissions related to impacts of construction parking on local streets and within the Hospital campus, it is recommended that the mitigation measure be amended to require that a final Construction Worker Transport Strategy prepared in consultation with Council.</p> <p>A requirement is also recommended to be included specifically stating that the Construction Worker Transport Strategy include</p>

	that no construction workers or contractors are permitted to park in the hospital's carpark.
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### 3.2.4.3 Traffic Impacts of Construction Works and Deliveries

Submission Points	Response
Negative impact of construction works, construction site compound and construction deliveries on the operations and amenity of the existing hospital.	<p>The exhibited REF Mitigation Measures include that a detailed Construction Traffic and Pedestrian Management Plan (CTPMP) is to be developed prior to commencement of works. Implementation of this Plan will allow impacts associated with construction traffic and deliveries to be minimised and appropriately mitigated.</p> <p>Refer also to attached Preliminary Traffic Management Plan (<b>Appendix H</b>) showing location where signage and traffic controllers will be stationed to assist with managing the impacts of construction deliveries.</p> <p>Furthermore, it is recommended that the CTPMP mitigation measure be amended to include the requirement that it be prepared in consultation with Council. Refer also to discussion under <b>Section 3.2.4.2</b> above, in relation to construction worker/contractor parking.</p>

### 3.2.4.4 Construction Management Plan

Submission Points	Response
Construction management plan submitted does address managing of all construction impacts.	A detailed Construction Environmental Management Plan (CEMP) will be developed prior to commencement of works in accordance with the recommended Mitigation Measures exhibited with the REF. This will ensure impacts of construction are minimised and appropriately mitigated.

## 3.2.5 Other Matters

### 3.2.5.1 Biodiversity

Submission Points	Response
<p>Objection to the proposed tree removal on the grounds of biodiversity impacts.</p> <p>Query on the biodiversity report which notes limitations as it was not conducted all year round. The importance of biodiversity warrants a full unrestricted study before concluding that minimal impacts exist.</p>	<p>A response to queries regarding biodiversity impacts has been prepared by Abel Ecology and is provided at <b>Appendix F</b>.</p> <p>The REF outlines 54 trees are to be removed. Abel Ecology note that the majority of trees to be removed are immature and do not provide significant habitat for native species.</p> <p>A mitigation measure is adopted to require replacement tree planting at a minimum ratio of 1:1 for the Albury Wodonga Regional Hospital Project.</p> <p>The proposal includes the retention of 23 trees. Proposed mitigation measures include the requirement that tree protection measures be put in place prior to and be maintained during construction, to prevent impacts on trees to be retained.</p>

	Abel Ecology has confirmed that their assessment fulfilled the obligation of considering biodiversity in part, through a 5-Part Test of threatened species and consulting existing survey data such as the BioNet Atlas Database.
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### 3.2.5.2 Relocation of Existing Demountable Buildings

Submission Points	Response
Insufficient information regarding the relocation of demountable buildings.	The relocation of the two (2) demountable office buildings is 'exempt development' and is not subject to assessment under the Northeast Building REF.

### 3.2.5.3 Design & Visual Impact

Submission Points	Response
Concerns about the visual impact of the building façade. Concerns in relation to the design of the building.	The visual impact from the building will be minimal noting its context within the Campus. The building is adequately set back from the hospital boundary to minimise its visual impact to the public domain and surrounding land uses. Tonal quality and material selection compliments the design of the existing buildings.  To further address design concerns and any visual impacts of the NEB, an additional mitigation measure is recommended to require that prior to the commencement of façade construction, elevation drawings shall be amended to provide further articulation.

### 3.2.5.4 Water and Wastewater

Submission Points	Response
Query about water and wastewater utility use in future stages.	Any impacts attributed to future stages of the hospital redevelopment will be fully investigated and detailed at that time as part of relevant planning assessment/approval documentation.

## 4 Proposed Amendments Since Exhibition

In response to the submissions received, the following new and amended mitigation measures are recommended and are included in the revised Mitigation Measures at **Appendix A** to this report.

Since the exhibition of the REF Health Infrastructure has updated its Mitigation Measure template. In this respect all exhibited mitigation measures are updated with new numbering and only those measures which are amended or added as a result of the public exhibition, are detailed below.

Original Mitigation Measure	Comments on Mitigation Measure
<b>Table at 2.1</b>	<p><b>Table at 2.1</b></p> <p>Mitigation measure 2.1 has been renumbered and is now A3. Drawings have been updated as follows:</p> <p>SKE-00002 Revision B is now Revision E</p> <p>SKE-00010 Revision F is now Revision G</p> <p>Plan titled NW TEMP Parking REF, Revision B is now replaced by plan titled NW Additional Parking, Revision D and Northwest Permanent and Temporary Carpark – Civil Works Plan, Revision T4.</p>
Nil.	<p>Additional mitigation measure added to ensure building façade treatment provides greater articulation, and to address submissions made in relation to design and visual impact.</p> <p><b>A12 Design Integrity</b></p> <p>Prior to commencement of facade construction, where feasible, facade elements of the NEB elevation drawings shall be amended to provide further articulation (e.g. changes to facade openings). Evidence of endorsement of the amended facade by HI Design Assurance shall be provided to the Crown Certifier.</p>
<p><b>26 Construction Management</b></p> <p>...</p> <p>(b) Construction Traffic and Pedestrian Management Plan;</p> <p>...</p>	<p><b>B21 Construction Management</b></p> <p>...</p> <p>(b) Construction Traffic and Pedestrian Management Plan <b><i>(prepared in consultation with Council);</i></b></p> <p>...</p>
<p><b>49 Traffic Management</b></p> <p>Existing traffic access and arrangements should be maintained during construction as much as practicable.</p>	<p><b>49 Traffic Management</b></p> <p>Deleted. Traffic management now address as part of requirements at B21 (refer above).</p>
<b>B39 Construction Worker Transport Strategy</b>	<p><b>B39 Construction Worker Transport Strategy</b></p> <p>Prior to the commencement of works, a <b><i>final</i></b> construction worker transport strategy shall be prepared. The strategy is to</p>

Original Mitigation Measure	Comments on Mitigation Measure
	<p>detail the provision of sufficient parking facilities or other travel arrangements for construction workers for the activity, to minimise parking in adjacent areas. <b><i>The Strategy shall be prepared in consultation with Council and shall include that no construction workers or contractors are permitted to park in the hospital's carpark.</i></b></p> <p>A copy of the <b>final</b> strategy is to be provided to the Crown Certifier.</p>
<p>Whole of document</p> <p>General mitigation measure numbers and wording - updates to conform to HI's updated mitigation measure template.</p>	<p>The originally exhibited recommended mitigation measures have been updated to reflect HI's updated mitigation measure template. All mitigation measure references have changed numbering; wording of measures has been contemporised and advisory notes added to provide clarity. More notable changes include those listed below.</p> <ul style="list-style-type: none"> <li>• MM 17.1 through 17.4 – mitigation measures relating to adoption of a construction or operational Staging Plan have been updated to include that if adopted, the Staging Plan is to be provided to the Certifier. The measures have also been updated to include that any revised Staging Plan is also to be provided to the Certifier. The requirement to submit to and seek approval from HI-Planning for the Staging Plan and any revised staging plan is removed.</li> <li>• MM 23 - Dangerous Materials now consolidated with MM C10</li> <li>• MM 40.1 through 40.4 are deleted. Six monthly monitoring and reporting for this project is replaced by formal independent environmental auditing.</li> <li>• MMs 62.1 through 62.4 now updated and reflected at MM D10 through D11.</li> <li>• MM76 - Requirement to comply with Protection of the Environment Operations Act 1997 is now updated and reflected at MM B16, C2, E4 and E5.</li> </ul>

## 5 Conclusion

This Submissions and REF Update Report documents and considers submissions received during the public exhibition and statutory notification period from 9 May 2025 to 6 June 2025, for the proposed Northeast Building, temporary northwest car park and associated works. All submissions have been read and considered. This report addresses the matters raised in submissions, and it is considered that the conclusions of the REF remain relevant.

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

The proposed activity can be justified on the following grounds:

- It responds to an existing need within the community; and
- It complies with, or is consistent with all relevant legislation, plans and policies; and
- It does not result in significant environmental impacts; and
- Adequate mitigation measures have been proposed to address impacts, so they are not significant.

The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5 of the *Environmental Planning and Assessment Act, 1979* (EP&A Act). Further, and as confirmed by the REF, the activity is not likely to significantly affect threatened species, populations, ecological communities or their habitats, and therefore it is not necessary for a Species Impact Statement to be prepared.

This Report has been prepared having consideration of the applicable Community Participation Plans (CPP and SCPP) and the *Guidelines for Division 5.1 Assessments* (DPHI June 2022 and October 2024).

On this basis, it is recommended that HI determine the proposed activity for approval in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this Submissions and REF Update Report (**Appendix A**).

## Health Infrastructure

1 Reserve Road  
St Leonards NSW 2065

Locked Mail Bag 2030  
St Leonards NSW 1590

T: 02 9978 5402  
W: [hinfra.health.nsw.gov.au](http://hinfra.health.nsw.gov.au)