

Review of Environmental Factors - Submissions Report

Moree Hospital Redevelopment

Version 02

6 December 2024

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 Attachment A Updated Mitigation Measures (Appendix R)2

1 Introduction

This REF Submissions Report has been prepared by HI-Planning Advisory in response to the Exhibition of the proposed activity at Moree Hospital and aims to consider and address the formal submissions that were received by Health Infrastructure (HI) as part of the Exhibition process.

The Review of Environmental Factors (REF) for the Moree Hospital Redevelopment was exhibited for 28 days from 29 October 2024 until 26 November 2024. A total of four (4) submissions were received from the public and government agencies during the exhibition period.

The Public Exhibition and Submissions Report has been prepared in accordance with the requirements of the following:

- *HI Community Participation Plan (CPP) (October 2024)*
- *Guidelines for Division 5.1 assessments – Consideration of environmental factors for health services facilities and schools*
- *Stakeholder and Community Participation Plan for New Health Services Facilities and Schools (DPHI, October 2024). Section 2.64 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP) as amended*

This Submissions Report has been prepared to address the submissions received and has been prepared in accordance with the requirements of Section 2.62A (2) (b) of the T&I SEPP which requires the consideration of any response that is received within the exhibition period.

The Submissions Report should be read in conjunction with any supporting technical information (refer to Table of Contents)

1.1 Consultation and Public Exhibition

On 22 October 2024 formal approval was granted to exhibit the REF. The following process has been followed;

- The REF was exhibited on the HI website and documents were accessible via an 'exhibition' tab on the 'projects' dropdown menu for a period of 28-days.
- Exhibition of the REF package on the HI website was managed by HI's Corporate & Digital Communications team.
- Notification letters were sent to Council, SES and adjoining landowners.
- Submissions were able to be sent to HI via the exhibition webpage, using a Microsoft forms template, and were received by the HI-Planning team.

2 Submissions Received

2.1 Council Submission

No formal submission was received by Moree Plains Council Shire.

2.2 Agency Submissions

One (1) submission was received from the State Emergency Services (SES).

2.3 Public Submissions

A total of three (3) submissions were received. Two (2) were received from members of the public and one (1) submission was received from a hospital staff member.

2.4 Summary of Raised Issues

A summary of key issues raised is provided in **Table 1**.

3 Response to Submissions

Table 1

Issue	Relevant Submission	Response
Member of the public No.1	The submitter wrote hoping that the new redevelopment will include services such as X-ray machine, palliative care, Renal, pathology, visiting specialists, maternity ward and essentially hopes many of these services are enlarged and expanded to cater for population growth in the wider region.	<p>The redevelopment will deliver new infrastructure including a new acute services building to house the emergency department, operating theatres, medical imaging, birthing and inpatient unit, and pathology, and a new main entry. All other existing services will remain in their current infrastructure.</p> <p>All the services mentioned by the submitter will be provided for in either new or existing facilities. The new contemporary acute services building will support best practice models of care and provide patients, families and carers a modern facility to meet the health needs of the community now and into the future. The Moree Hospital will continue to function as a District Hospital, providing care for the Moree and surrounding communities, and remain networked to Tamworth Hospital for access to specialist services.</p> <p>The LHD and project team have considered the issues raised as part of the Clinical Services Plan</p>

Issue	Relevant Submission	Response
		<p>and no changes to the mitigation measures are required.</p> <p>The submission does not prompt any changes to the REF.</p>
Member of the public No.2	This submitter wrote raising concern that there is only one ultrasound room in the plans. There are presently two machines at the hospital and that is a deficient amount for the needs of the community.	<p>The redevelopment will deliver new infrastructure including a new acute services building to house the emergency department, operating theatres, medical imaging, birthing and inpatient unit, and pathology, and a new main entry.</p> <p>The Moree Hospital Clinical Services Plan (CSP) considered the health service needs of the community now and in the future and used information to set the strategic direction and priorities for the service. For the medical imaging department, the CSP specifies three spaces for CT, ultrasound and x-ray, with sizing guided by the Australian Health Facility Guidelines (AusHFG). The medical imaging department at Moree Hospital is currently managed by a private provider, and use of the existing space may not align with the AusHFG.</p> <p>The Moree Hospital will continue to function as a District Hospital, providing care for the Moree and surrounding communities, and remain networked to Tamworth Hospital for access to specialist services.</p> <p>The LHD and project team have considered the issues raised and at this stage and in response to the submission no further changes are proposed to the design beyond the scope proposed.</p>

Issue	Relevant Submission	Response
		The submission does not prompt any changes to the REF or associated mitigation measures.
Hospital Employee	<p>This submission seeks clarification in respect to the proposed security arrangement and any systems (CCTV cameras and duress systems) to be implemented during construction.</p> <p>The submission requests further information specifically in respect to;</p> <ol style="list-style-type: none"> 1. Security Staff: <ul style="list-style-type: none"> • Could you please confirm whether the security staff patrolling the site outside of working hours will be internal NSW Health security personnel or if an external security contract will be engaged? 2. CCTV and Duress Systems: <ul style="list-style-type: none"> • Will the CCTV and duress systems be fully replaced with new systems, or will some components be retrofitted? • Additionally, will these systems include a battery backup to ensure continuous operation during power outages? 	<p>This submitter who works at the hospital is interested to understand the proposed security measures and systems to be implemented during construction.</p> <p>Security is important in and around the hospital however there are standard procedures and operational requirements that the hospital will need to satisfy during construction and through to operation.</p> <p>The design of the development has considered Crime Prevention Through Design to ensure that the hospital will be a safe and security enhanced through lighting and natural surveillance and additional security measures will be adopted by the LHD including the provision of CCTV cameras.</p> <p>During construction the builder will adopt security measures that have been outlined in the Construction Management Plan including patrolling the hospital and with appropriate site fencing etc.</p> <p>Security measures and settings will be further developed through the detailed design stage and the submitters concerns have been raised with the LHD to consider in their operational management planning as these requirements sit outside the scope of the REF requirements in respect to the planning and design of the project.</p>

Issue	Relevant Submission	Response
State Emergency Services (SES)	<p>SES reviewed the proposed activity in detail and provided an initial formal response on 8 December 2023 which was considered when developing and finalising the REF documentation. The recommendations within that report have been considered and implemented into the design and as part of the mitigation measures.</p> <p>This additional submission acknowledges that a significant part of the site becomes inundated in a 0.5% Annual Exceedance Probability (AEP) event with H2 flood hazard level before the site becomes completely inundated in a Probable Maximum Flood (PMF). It will achieve a flood hazard level of H5 which is unsafe for vehicles and people with buildings vulnerable to structural damage and that critical building services.</p> <p>SES notes that <i>“evacuation from the site is expected to become difficult during the 0.5% AEP with the broader road network impacted by flooding...however evacuation may still be possible by continuing east along Alice Street and then south on Warialda Street”</i></p> <p>The submission makes the following recommendations and comments;</p> <ul style="list-style-type: none"> • Early evacuation to occur before the site and road network becomes impacted. If flood is expected to exceed 10.32m at 	<p>The mitigation measures at Attachment A to the REF have been reviewed in light of the additional SES submission and have been updated in the following ways to address the SES response;</p> <p>The following mitigation measures are to be updated as highlighted in red;</p> <p>18.3 The Draft Flood Emergency Plan prepared by Northrop shall be further developed in consultation with The Local Health District, NSW SES, Moree Plains Shire Council and relevant community groups to ensure the evacuation strategy and emergency management measures are relevant, finalised and formally adopted prior to Occupation.</p> <p>The Evacuation Management Plan (EMP) should be updated to ensure early evacuation is enacted to avoid the site and road network being impacted. A trigger should include monitoring local gauges and if flood height is expected to exceed 10.32m at the Moree Gauge evacuation should occur (unless otherwise stipulated). A flood engineer should provide more detailed advice in respect to any evacuation procedures proposed.</p> <p>The following new mitigation measures are recommended to be imposed in response to the SES submission;</p> <p>18.6 Any storage rooms for critical supplies, goods and materials (including medicines) are to be located above the PMF where possible.</p>

Issue	Relevant Submission	Response
	<p>Moree gauge then evacuation of the site to happen.</p> <ul style="list-style-type: none">• Critical Building Services infrastructure within the site is protected and SES recommend having this located above PMF level where possible.• Storage rooms for critical supplies, goods and materials (including medicines) are located above the PMF to avoid contamination and potential environmental and health impacts, disruptions and financial losses.• If construction phases of the development causes any disruption to the operation of local roads which could impact the ability of emergency services to use certain routes, SES requests notification be provided where there could be any significant delays.	<p>18.7 Any critical building services infrastructure within the site is protected and it is recommended that it is located above the PMF where possible.</p> <p>These measures are included in the updated Appendix R – Mitigation Measures which can be found at Attachment A.</p>

4 Proposed Amendments Since Exhibition

The submissions received in response to the REF do not generate the need for any design changes.

The SES response requires an update to some of the mitigation measures as noted above. In addition, standard mitigation measures have been updated to address recent changes to the T&I SEPP provisions which came into effect on 22 November 2024. Section 2.62A (5) is a new requirement which states;

The public authority must also give written notice of the intention to start work at least 2 days before the work starts to—

(a) the occupiers of any dwelling located within 20m of the site boundary of the proposed development, and

(b) if the public authority is not the relevant council—the relevant council.

The mitigation measures have been updated to ensure they include this requirement and consider the response to submissions process. The updated measures are **Attachment A**.

5 Conclusion

In accordance with section 2.62A (2)(b) of the T&I SEPP, this Submissions Report documents all submissions received during the public exhibition period from 29 October 2024 to 26 November 2024. All responses have been considered and addressed in accordance with the response to submissions process.

Appendices

Attachment A

Appendix R - Updated Mitigation Measure

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