

HEALTH INFRASTRUCTURE

Review of Environmental Factors

Finley Health Service Redevelopment

11 November 2024

Version Number 05



Declaration

This Review of Environmental Factors (REF) has been prepared for Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from partial refurbishment and minor extension of the existing health service facility at 24 Dawe Avenue, Finley NSW 2713.

This REF has been prepared in accordance with the relevant provisions of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP).

This REF provides a true and fair review of the activity in relation to its likely impact on the environment and the information it contains is neither false nor misleading. It addresses to the fullest extent possible all the factors listed in Section 3 of the *Guidelines for Division 5.1 Assessments* (June 2022), the EP&A Regulation and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

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

Declaration

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Appendices

Appendix	Description	Author	Rev/Ref/Date
A	Planning Certificate	Berrigan Shire Council	31 August 2023
B	Architectural Plans	HDR Architects	31 January 2024
C	Finley Schematic Design Report	HDR	7 March 2024
D	Site Survey	Walpole Surveying	14 October 2022
E	Preliminary Ecological Assessment Report	Abel Ecology	2 July 2024
F	Preliminary Site Investigation	JK Geotechnics	21 June 2023
G	Detailed Site investigation	JK Geotechnics	9 November 2023
H	Remediation Action Plan	JK Geotechnics	15 October 2024
I	Hazardous Materials Report	JK Environments	6 June 2023
J	Engagement Summary Report	MLHD	12 February 2024
K	Landscape Plans and Design Statement	Site Image Landscape Architects	July 2024
L	Geotechnical Investigation	JK Geotechnics	14 June 2023
M	Engineering Concept Design Report	GHD	2 November 2023
N	BCA Report	BMG	1 February 2024
O	Civil and Structural Engineering Report	Tonkin	23 January 2024
P	Preliminary Construction Management Plan	Capital Insight	March 2024

Q	Noise and Vibration Assessment	GHD	1 May 2024
R	Notification Letters	HI / Urbis	30 April 2024
S	Flooding Assessment	GHD	6 May 2024
T	Sustainable Development Strategy	GHD	2 April 2024
U	Aboriginal Heritage Due Diligence	NGH	25 January 2024
V	Statement of Heritage Impact	NGH	25 January 2024
W	Arboricultural Impact Assessment	Wade Ryan Consulting	June 2024
X	Waste Management Plan	Capital Insight	June 2024
Y	Staging Strategy	HDR	12 April 2024
Z	Connecting with Country Report	MLHD	February 2024
AA	Mitigation Measures	Urbis	23 August 2024
BB	Tonkin Memorandum	Tonkin	24 July 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	<i>Biodiversity Conservation Act 2016</i>
BC Act 2017	<i>Biodiversity Conservation Act 2017</i>
BC Regulation	Biodiversity Conservation Regulation 2017
BAM	Biodiversity Assessment Method
CA	Certifying Authority
CE	Chief Executive
CM Act	<i>Coastal Management Act 2016</i>
CMP	Construction Management Plan
CWC	Connecting with Country
DPHI	Department of Planning, Housing & Infrastructure
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EES	Environment, Energy and Science
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act (Cwth)	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument

Abbreviation	Description
EPL	Environment Protection License
FM Act	<i>Fisheries Management Act 1994</i>
Ha	Hectares
HHIMS	Historic Heritage Information Management System
HI	Health Infrastructure
LEP	Local Environmental Plan
LGA	Local Government Area
MNES	Matters of National Environmental Significance
NCC	National Construction Code
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPW Regulation	National Parks and Wildlife Regulation 2009
NPWS	National Parks and Wildlife Service (part of EES)
NT Act (Cth)	<i>Commonwealth Native Title Act 1993</i>
OEH	(Former) Office of Environment and Heritage
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Proponent	Health Infrastructure
RAP	Remediation Action Plan
REF	Review of Environmental Factors
RF Act	<i>Rural Fires Act 1997</i>
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
TI SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	<i>Water Management Act 2000</i>

Executive Summary

The Proposal

The proposal involves a minor extension to the existing Finley Health Service building to deliver six new inpatient beds (as replacement of existing beds), and an expanded Front of House. The works will also provide a new main entrance, internal refurbishment of the emergency department and relocation and enhancement of medical imaging, services upgrade, landscaping, and the replacement of the existing roof.

Need for the Proposal

The existing Finley Health Service was established in 1962 and now experiences compliance and functionality challenges in some areas. The proposed partial refurbishment is required to upgrade the building to support the delivery of contemporary healthcare services.

Proposal Objectives

A key objective of the proposal is to enhance the current service and facilities and address the health care needs of the community and surrounding areas now and into the future. The works will address existing facility condition, compliance, and functionality improvements that deliver and maintain the service capacity requirements defined within the Finley Health Service Plan. The proposal supports the delivery of safe, high-quality, clinical services and contemporary models of care and will deliver a health service that valued by the community.

Options Considered

The project team considered multiple options including a full refurbishment, part refurbishment / part new build and a complete new building. Each option was assessed against project budget, project priorities and the functional requirements of the brief.

The proposed partial refurbishment and minor extension of the existing building best met the functional requirements of the health service within the available budget.

Site Details

The site is legally known as Lot 246 in DP 1016411 at 24 Dawe Avenue, Finley and is approximately 1.97ha in area. The site is within the Berrigan Local Government Area ('LGA') in the Riverina Region of NSW. The site contains Finley Health Service, with a 24-hour Emergency Department. The site is the Hub for a cluster of rural facilities (Finley, Barooga, Berrigan, Jerilderie and Tocumwal) and supports clinical services in the local region.

Planning Approval Pathway

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

State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the TI SEPP outlines the approval requirements for health services facilities. A hospital is defined as a health services facility under this division as 'health services facility' has the same meaning as in the Standard Instrument LEP.

The site is zoned RU5 Village under the *Berrigan Local Environmental Plan 2013*. The RU5 Zone is a prescribed zone under the TI SEPP.

The proposal involves the alteration of a building that is a *health services facility* which is classified as 'development without consent' pursuant to Clause 2.61 of the TI SEPP.

2.61 Development permitted without consent

(1) Any of the following development may be carried out by or on behalf of a public authority without consent on any land if 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).*
- (2) This section does not permit the erection of any building that exceeds 15 metres in height or is located closer than 5 metres to any property boundary (or an addition to a building resulting in the building exceeding that height or being closer than that distance to any property boundary).*

Section 2.61(1) of the TI SEPP permits development by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility.

A public authority is defined under the EP&A Act as:

Public authority means:

- (a) A public or local authority constituted by or under an Act, or*
- (b) A Public Service agency, or*
- (c) A statutory body representing the Crown, or*
- (d) A Public Service senior executive within the meaning of the Government Sector Employment Act 2013, or*
- (e) A statutory State-owned corporation (and its subsidiaries) within the meaning of the State-Owned Corporations Act 1989, or*
- (f) A chief executive officer of a corporation or subsidiary referred to in paragraph (e), or*
- (g) A person prescribed by the regulations for the purposes of this definition.*

NSW Health Infrastructure falls within the above definition and so a “public authority” as defined in Section 1.4 of the EP&A Act. NSW Health Infrastructure is therefore both the Proponent and the determining authority for the purposes of Division 5.1 of the EP&A Act.

In respect to Clause 2.61(1)(a) above, the proposal involves the alteration of a building that is a *health services facility*. In respect to Clause 2.61(2) above, the proposal does not involve the erection of a building exceeding 12m in height or result in the building being located closer than 5m to a property boundary. Accordingly, the proposal can be classified as ‘development without consent’, consistent with clause 2.61 of the TI SEPP.

Therefore, as the proponent is a public authority and the development activity is within the boundaries of a health services facility, the project becomes 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 clause 5.1 of the EP&A Act because ‘the carrying out of a work’, is explicitly referenced under the definition of ‘activity’ in clause 5.1(1)(d).

Statutory Consultation

The Council and adjoining property occupiers were notified under Division 10 (Clause 2.62) of the TI SEPP as the proposal involves the alteration of, or addition to, a building that is a health services facility. There are no other consultation requirements under Division 1 of the TI SEPP.

No (0) responses were received from Council and adjoining occupiers.

Environmental Impacts

As part of its obligations under Section 5.5 of the EP&A Act, Health Infrastructure is required to take into account, to the fullest extent possible, all matters likely to affect the environment. To comply with this obligation, a wide range of potential environmental impacts have been assessed for this REF. The environmental impacts of the works are minor given the siting of the project within the grounds of the existing hospital and the minor external alteration proposed. Where considered necessary, mitigation measures have been proposed to ensure that all environment impacts of the proposed works including impacts to biodiversity, traffic and parking are no more than minor.

Justification and Conclusion.

The proposed works to the Finley Health Service are subject to assessment under Part 5 of the EPA Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As discussed in detail in this report, the proposed activity 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.

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the activity, it is determined that:

- The proposed activity responds to an existing need within the community.
- The extent and nature of potential impacts will not have significant adverse effects on the locality, community and the environment.
- Potential impacts can be appropriately mitigated and managed to ensure that there is minimal effect on the locality and community.
- The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an Environmental Impact Statement (EIS) to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5.1 of the EP&A Act.
- The proposed development will not have any effect on matters of national significance and approval of the activity under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* is not required.
- There are no separate approvals, authorisations or notifications required in relation to the proposed development activity prior to determination under Part 5 of the EP&A Act or under any other Acts.

On this basis, it is recommended that HI approve the proposed activity in accordance with Part 5 of the EPA Act and subject to the adoption and implementation of mitigation measures recommended in this report.

1. Introduction

Health Infrastructure (HI) propose the partial refurbishment and extension of the existing health service facility (the proposal) at 24 Dawe Avenue Finley New South Wales 2173 (the site). This is part of the delivery of infrastructure solutions and services to support the healthcare needs of the NSW communities.

This Review of Environmental Factors (REF) has been prepared by Urbis on behalf of HI to determine the environmental impacts of the development activity at the Finley Health Service. For the purposes of these works, HI is the proponent and the determining authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The purpose of this REF is to describe the proposal, to document the likely impacts of the proposal on the environment and to detail protective measures to be implemented to mitigate impacts.

The description of the proposed works and associated environmental impacts have been undertaken in the context of section 170 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), that is, the Department of Planning and Environment's Guidelines for Division 5.1 assessments – June 2022, as well as the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

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

- Whether the proposed activity is likely to have a significant impact on the environment and therefore the necessity for an EIS to be prepared and approval to be sought from the Minister for Planning and Public Spaces under Part 5 of the EP&A Act; and
- The potential for the proposal to significantly impact Matters of National Environmental Significance (MNES) on Commonwealth land and the need to make a referral to the Australian Government Department of Environment and Energy for a decision by the Commonwealth Minister for the Environment on whether assessment and approval is required under the EPBC Act.

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

1.1 Proposal Need and Alternatives

An overview of the alternatives, and an identification of the preferred alternative, for the Proposal are provided within Table 1.

Table 1: Alternatives considered for the Proposal

Alternative description	Advantages and disadvantages	Preferred alternative
Do nothing	Retaining the existing hospital in its current configuration does not enable improved functionality and service delivery to meet future healthcare delivery requirements. The 'Do Nothing' approach would not address fundamental, condition compliance and functionality concerns.	
Existing hospital demolished and a new hospital building constructed on the eastern portion of the site.	Cost exceeded available budget.	
Demolish existing hospital and build new hospital with a reduced schedule of accommodation.	Did not improve level of care. Not considered value for money. Did not deliver the required scope.	
Minor extension to existing hospital, partial refurbishment including new main entrance, new medical imaging, new services and new roof.	Enhanced level of care through delivery of six new in patient beds (as replacement of existing beds). Addresses deterioration of existing building. Enhanced medical imaging service able to be provided. Improved patient flows through the building.	✓

2. Site Analysis and Description

2.1 The Site and Locality

Table 2: Description of the site

Site Description	
Address	24 Dawe Avenue, Finley 2713 Berrigan Local Government Area (LGA)
Legal Description	Lot 246 in DP 1016411
Site Area	1.97ha
Owners	Health Administration Corporation (HAC)
Heritage	N/A

2.2 Existing Development

The site contains the existing Finley Health Service, with a 24-hour Emergency Department. The site is the Hub for a cluster of rural facilities (Finley, Berrigan, Jerilderie and Tocomwal) and supports clinical services in the local region. It is within the Murrumbidgee Local Health District (MLHD).

The site comprises the following existing development (please refer building numbers on **Figure 1**)

- Health Service Building and associated Plant Room (Building 1)
- Community Health Building (Building 2)
- Staff Accommodation Building (Building 3)
- Mortuary Building (Building 4)

Typically, the buildings are single storey structures with brick clad and internal load bearing masonry walls. Roof structures are generally timber framed supporting metal deck roof.

The existing parking arrangement consists of visitor parking for approximately 30 cars accessed from Dawe Ave on the northern side of the site. There is Community Centre parking accessed from Dawe Ave located at the west of the site and staff parking in an informal arrangement at the south of the site accessed from Scoullar Street.

2.3 Surrounding Development

The surrounding land uses are predominantly rural, large lot residential and rural village. Development surrounding the site comprises the following (please refer numbers on **Figure 1**)

- Finley Regional Care (Aged Care Facility) (Building 5)
- Diggers Park (Item 6)
- Agricultural College (Building 8, Dawe Avenue)
- Finley Medical Centre (Building 9)

Finley RSL Club and Finley High School are located approximately 200m north-east of the site on Dawe Avenue.

Photographs of the site are provided in **Figure 2**.

Figure 1 Aerial Image



Source: HDR (2024)

Figure 2 Site Photographs



Picture 1 Finley Health Service Entrance

Source: HDR (2023)



Picture 2 Carpark at Hospital Entrance

Source: GHD (2024)



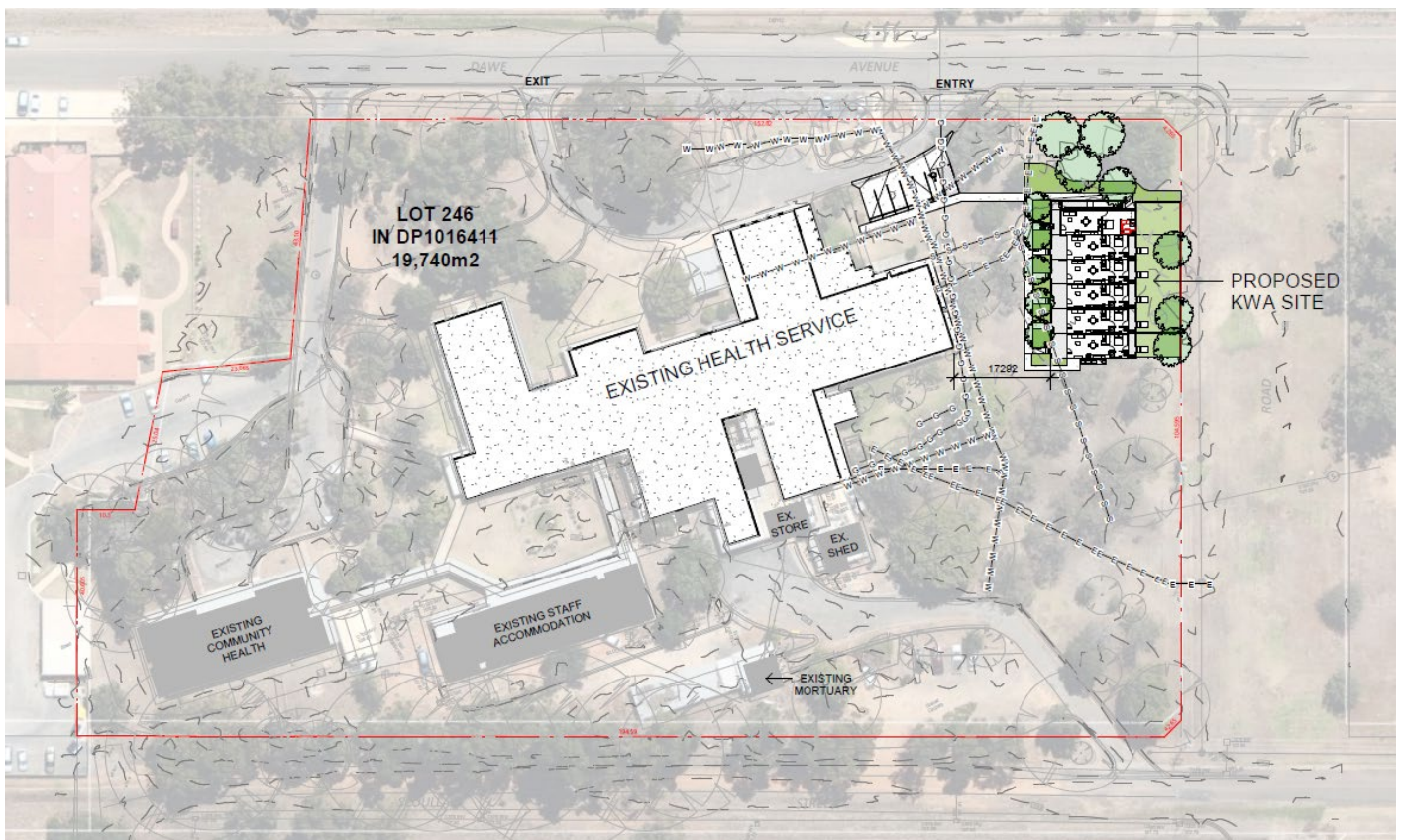
Picture 3 Emergency Department

Source: NGH Environmental (2023)

Key Worker Accommodation Facility

A key worker accommodation (KWA) building is to be constructed near the north eastern corner of the health facility site, refer Figure 3. Approval for this activity is under a Complying Development Certificate (CDC) process. The proposed activity does not impact this part of the site.

Figure 3 Finley Key Worker Accommodation Building



Source: Kearney Architecture

2.4 Site Considerations and Constraints

Section 10.7 Planning Certificate No. 57/2024 dated 31 August 2023 (provided at **Appendix A**) identifies that the site is located within the RU5 Village zone under Berrigan Shire Local Environmental Plan 2013.

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 Activity

3.1 Proposal Overview

The proposal is part of a broader program of works being undertaken in rural areas. A key objective of the proposal is to enhance the current service and facilities and address the health care needs of the community and surrounding areas now and into the future. The works will deliver and maintain the service capacity requirements defined within the Finley Health Service Plan and deliver a health service that contributes and connects to the Finley Health Hub and is valued by the community.

The existing hospital dates back to 1962 and is outdated with building compliance and functionality issues due to ageing infrastructure. It is also showing various signs of internal water ingress and cracks in ceilings and walls. The proposal is therefore required to upgrade the hospital to support the delivery of contemporary healthcare services.

The proposal involves a minor extension to the existing hospital building to replace inpatient bedrooms that do not have medical gasses and are disconnected from the other inpatient beds, resulting in poor utilisation. The works will also provide a new main entrance, internal refurbishment of the emergency department and medical imaging, services upgrade, landscaping and the replacement of the existing roof. BCA and DDA compliance upgrades will also take place within the areas impacted by works.

The proposal is to be undertaken in the following stages, planned to be delivered whilst minimising operational impact to the hospital. For further detail refer to the staging plans at **Appendix X**.

Stage 1 IPU Extension, Communications Room and Part Emergency Department

- Build new IPU Extension
- Part ED Refurbishment
- Replace roof to eastern end of Hospital

- Expand existing Comms Room
- Refurbishment to existing Staff Room
- Replace roof to eastern end of Hospital

Stage 2 Rebuild Front of House (FoH), Imaging and Triage

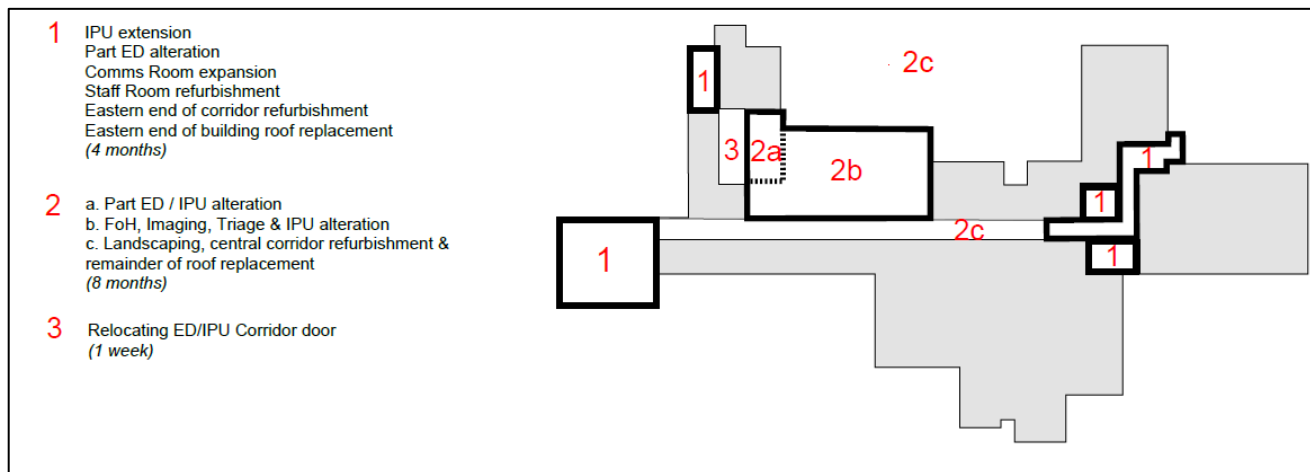
- Temporary Entry for Admin and Visitors opens
- Existing Ambulance Entry
- a. Part ED / IPU Refurbishment prioritised
- b. FoH, Imaging, Triage & IPU Alteration
- c. Landscaping and remainder of roof replacement

Stage 3 ED/IPU Corridor Alteration

- Demolishing existing double doors in corridor and adding new double doors.

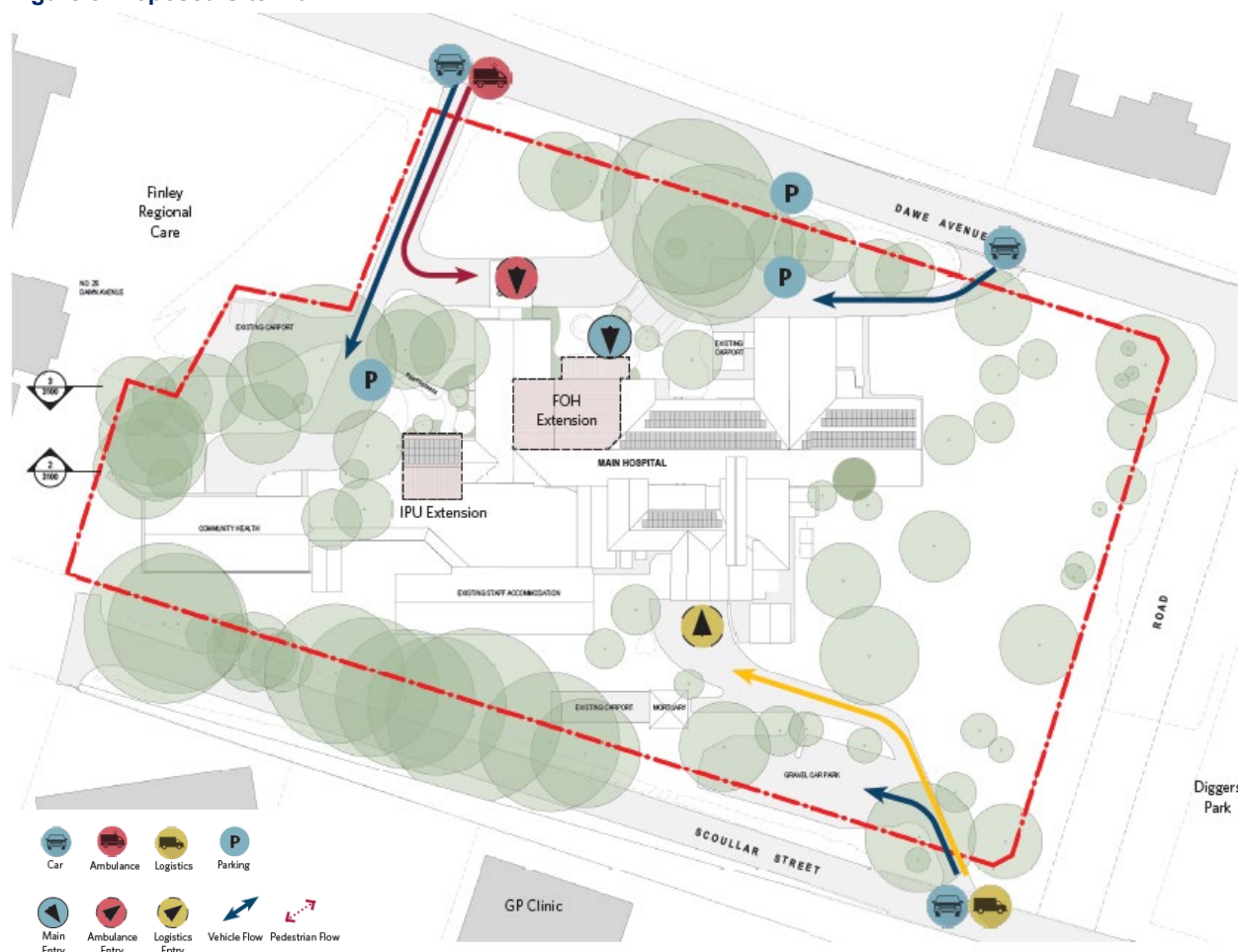
The proposed staging is illustrated in Figure 3 below.

Figure 4 Proposed Staging



Source: HDR (2024)

Figure 5 Proposed Site Plan



Source: HDR (2024)

North and south elevations of the proposed works are included at Figure 4. Figure 5 is a render of the new main entrance also showing the proposed landscaping and new roof. The exterior materials and finishes for the proposed works were inspired by the Connecting with Country Consultation undertaken for the Project (refer Connecting with Country report at **Appendix Z**). The deep ochre red has been selected to represent the sprouting buds of the lemon scented gum trees that are planted around the hospital. These trees have traditional antiseptic uses of this tree and are desirable for use in smoking ceremonies due to their strong lemon aroma.

Figure 6 North and South Elevations



Figure 7 Render of new main entrance



Source: HDR (2024)

3.2 Landscaping

The proposed landscaping works have also been informed by Connecting with Country Principles and use species from locally indigenous planting communities to celebrate the local landscape and provide habitat for local species and small birds. The landscaping design proposed for the site is shown in Figure 6.

Figure 8 Landscape Design



3.3 Construction Activities

An overview of construction timeframes and construction management arrangements is provided in Table 4 below.

Table 4: Project Timeframes and Construction Activities

Construction activity	Description
Commencement Date	Main works to commence in 2025 and to be completed in 2026.
Work Duration/Methodology	To be confirmed as part of the main work tender package.
Work Hours and Duration/Construction	Standard construction hours,

Construction activity	Description
	Monday Friday 7am -6pm Saturday 8am -1pm. Sunday and Public Holiday: no work
Ancillary Facilities	A temporary site office will be established on site during construction with construction worker amenities including toilets and a lunch room. Construction workers will be encouraged to park off site on Scoullar Street, Donaldson Street and Dawe Street. Short term loading facilities only will be provided on site.
Plant Equipment	To be confirmed as part of the main work tender package.
Source and Quantity of Materials	To be confirmed as part of the main work tender package.
Traffic Management and Access	A Construction, Pedestrian and Traffic Management Plan will be developed by the Principal Contractor upon their engagement. Construction vehicles will enter and exit the site from Dawe Avenue. NSW Ambulance Service will continue to require access to the Emergency Department throughout the construction phase. Unobstructed Ambulance access will be a priority for traffic management.

3.4 Operational Activities

Use

There will be no changes to existing use as a result of the proposed works.

Operation Hours

No changes to operating hours.

Staff/Patients

There will be no additional staff working at the hospital. Modest increases in the number of outpatient and ED patients are anticipated.

Traffic and Parking

There are no changes to existing parking provision or access arrangements.

4. Statutory Framework

4.1 Activity Description under TI SEPP

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

State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the TI SEPP outlines the approval requirements for health service facilities.

The site is zoned RU5 Village under the *Berrigan Local Environmental Plan 2013*. The RU5 Zone is a prescribed zone under the TI SEPP.

Health Services Facilities are not expressly permitted with consent within the RU5 Zone. However, Clause 2.61(1) 'Development permitted without consent' of the TI SEPP permits development by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility.

The relevant provision within Division 10 that provides the permissibility and the planning pathway is Clause 2.61, as follows:

2.61 Development permitted without consent

(1) Any of the following development may be carried out by or on behalf of a public authority without consent on any land if 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).

(2) This section does not permit the erection of any building that exceeds 15 metres in height or is located closer than 5 metres to any property boundary (or an addition to a building resulting in the building exceeding that height or being closer than that distance to any property boundary).

In respect to Clause 2.61(1)(a) above, the proposal involves the alteration of a building that is a health services facility.

In respect to Clause 2.61(2) above, the proposal does not involve the erection of a building exceeding 12m in height or result in the building being located closer than 5m to a property boundary. Accordingly, the proposal can be classified as 'development without consent', consistent with clause 2.61 of the TI SEPP.

The project becomes 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 clause 5.1 of the EP&A Act because 'the carrying out of a work', is explicitly referenced under the definition of 'activity' in Clause 5.1(1)(d).

The development activity solely comprises the above elements and is therefore considered an 'activity' for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment via an REF.

TI SEPP consultation is discussed within Section 5 of this REF.

Table 5: Description of proposed activities

Division and Section within TI SEPP	Provision	Development Activity	Satisfied Yes/No
Division 10 – Section 2.61 – 'Development permitted without consent'.	<p>(1) Any of the following development may be carried out by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility—</p> <p>(a) the erection or alteration of, or addition to, a building that is a health services facility,</p> <p>(b) development for the purposes of restoring or replacing accommodation or administration facilities,</p> <p>(c) demolition of buildings carried out for the purposes of a health services facility,</p> <p>(d) development for the purposes of patient transport facilities, including helipads and ambulance facilities,</p> <p>(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).</p>	The works fall into category 2.61(1) (a). The development activity will take place within the grounds of an existing health services facility and comprises 'alterations to a health services facility.'	Yes
	<p>(2) This section does not permit the erection of any building that exceeds 15 metres in height or is located closer than 5 metres to any property boundary (or an addition to a building resulting in the building exceeding that height or being closer than that distance to any property boundary).</p>	<p>The existing hospital building and the proposed extension are less than 15m high.</p> <p>The building and the area of the extension are located greater than 5m from all property boundaries.</p>	Yes

Division and Section within TI SEPP	Provision	Development Activity	Satisfied Yes/No
Division 10 – Section 2.63 – 'Exempt Development'	<p>(1) Any of the following development is exempt development if it is carried out within the boundaries of an existing health services facility and complies with section 2.20—</p> <p>(a) development for the purposes of roads and cycleways,</p> <p>(d) development for the purposes of landscaping, including landscape structures or features (such as art work) and irrigation systems.</p>	The proposed landscaping could be carried out as exempt development but as it is associated with the building works it is considered holistically throughout this REF.	Yes

4.2 Environmental Planning and Assessment Act 1979

The proposed activity is consistent with the objectives of the EP&A Act as outlined in Table 6 below.

Table 6: Consideration of the Objectives of the EP&A Act

Object	Comment
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development, and conservation of the State's natural and other resources,	The proposed works will promote social welfare by providing an improved health service for the Finley community.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposed works will update and improve an existing health service building thereby promoting the sustainable use of materials and resources. The scope of works includes sustainability initiatives including the installation of solar panels.
(c) to promote the orderly and economic use and development of land,	The proposed works represent an orderly and economic use of land.
(d) to promote the delivery and maintenance of affordable housing,	N/A
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposed works will not impact on threatened species, ecological communities and their habitats.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	N/A, the subject site is not a heritage item and no Aboriginal sites, objects or places, or areas of potential Aboriginal archaeological sensitivity have been identified.
(g) to promote good design and amenity of the built environment,	The proposed activity will upgrade the front of house and main entrance and deliver a modernised and visually refreshed facility which will improve the amenity of the built environment.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposed works are essential improvements and updates required to improve the working environment for health service staff and patients.
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	The proposal is an activity categorised as 'development without consent' which complies with relevant statutory controls and guidelines and provides for self assessment by HI and alleviates pressure on local government and the planning system.
(j) to provide increased opportunity for community participation in environmental planning and assessment.	Yes, consultations with external stakeholders have occurred during the planning and design phases for the redevelopment including staff and the Finley community, as well as local Aboriginal community, General Practitioners, Berrigan Shire Council and Finley Local Health Advisory Committee. The proposal has also been notified to Berrigan Shire Council and to the occupiers of adjoining lands in accordance with statutory requirements.

4.3 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the EPBC Act do not affect the proposal as it is not development that takes place on or affects Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency or development on Commonwealth land, nor does the proposed development affect any matters of national significance. An assessment against the EPBC Act checklist is provided at Table 7.

Table 7: EPBC Checklist

Consideration	Yes/No
Will the activity have, or likely to have, a significant impact on a declared World Heritage Property?	No
Will the activity have, or likely to have, a significant impact on a National Heritage place?	No
Will the activity have, or likely to have, a significant impact on a declared Ramsar wetland?	No
Will the activity have, or likely to have, a significant impact on Commonwealth listed threatened species or endangered community?	No
Will the activity have, or likely to have, a significant impact on listed migratory species?	No
Will the activity involve nuclear actions?	No
Will the activity have, or likely to have, a significant impact on Commonwealth marine areas?	No
Will the activity have any significant impact on Commonwealth land?	No
Will the activity affect a water resource, with respect to a coal seam gas development or large coal mining development?	No

4.4 Environmental Planning and Assessment Act 1979

Duty to Consider Environmental Impact

Part 5 of the EP&A Act applies to activities that are permissible without consent and are generally carried out by a public authority. Activities under Part 5 of the EP&A Act are assessed and determined by a public authority, referred to as the determining authority. Health Infrastructure is a public authority and is the proponent and determining authority for the proposal.

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 Subsection 1 of Section 5.5 of the EP&A Act).

Section 171 of the *Environmental Planning and Assessment Regulation (2021)* (EP&A Regulation) defines the factors which must be considered when assessing the likely impact of an activity on the environment under Part 5 of the EP&A Act. Section 6 of this REF specifically responds to the factors for consideration for the activity.

Table 8 below demonstrates the effect of the proposed development activity on the matters listed for consideration in Subsection 3 of Section 5.5 of the EP&A Act.

Table 8: Matters for consideration under Subsection 3, Section 5.5 of the EP&A Act

Matter for Consideration	Impacts of Activity
<p><i>Subsection 3:</i></p> <p>Without limiting subsection 1, a determining authority shall consider the effect of any activity on any wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.</p>	<p>The redevelopment activity will not be carried out in a wilderness area (within the meaning of the <i>Wilderness Act 1987</i>).</p>

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.

4.5 Environmental Planning and Assessment Regulation 2021

The *Guidelines for Division 5.1 Assessment* (DPE June 2022) provides a list of environmental factors that must be taken into account for an environmental assessment of the activity under Part 5 of the EP&A Act. These factors are considered at Section 6 of this REF.

In addition, Section 171A of the EP&A Regulation requires the consideration of the impact an activity in a defined catchment. This is considered further below under Table 9 of this REF.

4.6 Other NSW Legislation

Table 9 below lists any additional legislation that is required to be considered if it is applicable to the proposed activity.

Table 9: Other Possible Legislative Requirements

Legislation	Comment	Relevant? Yes/No
State Legislation		
<i>Rural Fires Act 1997</i>	The site is not identified on the Bushfire Prone Land Map.	No
<i>Biodiversity Conservation Act 2016</i>	<p>An ecological assessment has been prepared by Abel Ecology (Appendix E) that concludes the site does not contain any critical habitat, threatened species or ecological population or communities. The project area is located in a modified urban environment with areas of planted landscaping. It is not within a declared area of outstanding biodiversity value.</p> <p>The report concludes that the proposed works will not have a significant effect on species, ecological communities or their habitats.</p>	Yes
<i>Water Management Act 2000</i>	The works are not within 40 metres of a watercourse.	No
<i>Contaminated Land Management Act 1997</i>	The site has not been regulated by the EPA under the Contaminated Land Management Act 1997.	No
<i>Heritage Act 1977</i>	<p>The Heritage Act 1977 (Heritage Act) was passed for the purpose of conserving items of environmental heritage. The Heritage Act is designed to protect both known heritage items and potential archaeological remains or 'relics'. The Heritage Act establishes the State Heritage Register.</p> <p>There are no State Heritage listed items within the project area.</p>	No
<i>Roads Act 1993</i>	The activity does not comprise any works to a public road, or pumping of water onto a public road, or involve the connection of a road to a classified road. Therefore approvals are not required under the Roads Act 1993.	No
<i>Environmental Planning and Assessment Act 1979</i>	<p>Section 4.2 of the EP&A Act concerns development that requires consent and identifies that approval is required and that development must be carried out in accordance with consent.</p> <p>Section 4.1 of the EP&A Act states that if an EPI provides that development may be carried out without the need for development consent, a person may carry the development out, in accordance with the EPI, on land to which the provision applies.</p> <p>Part 5 of the EP & A Act identifies the environmental assessment of activities undertaken 'without consent' is required and that a determining authority is required to take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity. This report fulfils that requirement.</p>	Yes
<i>National Parks and Wildlife Act 1974</i>	<p>The NPW provides statutory protection for all Aboriginal 'objects' (consisting of any material evidence of the Aboriginal occupation of NSW), and for 'Aboriginal Places' (areas of cultural significance to the Aboriginal community).</p> <p>NGH Environmental Consultants was commissioned by NSW HI to undertake an Aboriginal Heritage Due Diligence Assessment in accordance with the <i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW</i> (DECCW) for the Finley Health Service redevelopment. The Assessment states the Proposal Area has been impacted by initial vegetation clearing, the establishment and use of racecourse for over two decades and the construction of the hospital and associated buildings/infrastructure, therefore reducing the potential for Aboriginal objects to occur. The Assessment concludes the Proposal Area does not specifically contain the general landscape features likely to contain Aboriginal objects as defined by the Code of Practice.</p>	Yes

Legislation	Comment	Relevant? Yes/No
Environmental Planning and Assessment Regulation 2021	Section 171(1) of the <i>Environmental Planning and Assessment Regulation (2021)</i> notes 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 guidelines that apply to the activity.	Yes
Other Acts as required	Any other acts as required to be addressed?	No
State Environmental Planning Policies		
State Environmental Planning Policy (Planning Systems) 2021	<p>State Environmental Planning Policy (Planning Systems) 2021 comprises the following repealed SEPPs:</p> <ul style="list-style-type: none"> State Environmental Planning Policy (State and Regional Development) 2011 State Environmental Planning Policy (Aboriginal Land) 2019 State Environmental Planning Policy (Concurrences and Consents) 2018 <p>The proposed works are not State Significant Infrastructure to which the Planning Systems SEPP applies.</p>	No
State Environmental Planning Policy (Biodiversity and Conservation) 2021	<p>All relevant provisions of the Biodiversity and Conservation SEPP have been considered in this REF.</p> <p>Chapter 2 Vegetation in non-rural areas aims to protect the biodiversity value of trees and other vegetation in non-rural areas of the State, and to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation.</p> <p>Chapter 3 incorporates the provisions of Koala Protection 2020. The site is not identified as potential or core koala habitat. The proposed works do not result in the removal of any trees and do not trigger the provisions of the SEPP.</p>	Yes
State Environmental Planning Policy (Resilience and Hazards) 2021	<p>Chapter 4 of the <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards SEPP) requires that a consent authority must not consent to the carrying out of any development on land unless it has considered whether the land is contaminated. Consent can be granted for development if the land is contaminated but the consent authority must be satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out. The consent authority must also be satisfied that the land will be remediated before the land is used for that purpose.</p> <p>JK Environments has prepared a Preliminary Site Investigation (Appendix F), Detailed Site Investigation Assessment (DSI) (Appendix G) and Remediation Action Plan (RAP) (Appendix H) for the site. The DSI identified underground service tanks (USTs) and odorous fill soils in the southern part of the site. The DSI recommended that a RAP be prepared to provide a framework to manage the removal of and potential risks associated with contamination. It is noted that areas of environmental concern (AECs) were not identified in the vicinity of the proposed activity.</p> <p>The RAP outlines requirements for remediation of the UST area by remediation and in situ abandonment of the tanks and any associated infrastructure to the extent practicable. Where associated infrastructure cannot be removed, it is to be decommissioned in-situ.</p> <p>The RAP concludes that risks associated with the USTs can be mitigated via remediation and the implementation of the RAP. The residual risks will be assessed by the validation process. A validation report is to be prepared on completion of remediation activities. If contaminated material is capped on site a long-term Environmental Management Plan (EMP) will also be prepared as part of the validation documentation.</p> <p>The recommendations of the RAP are found in Appendix H.</p>	Yes
State Environmental Planning Policy (Transport and Infrastructure) 2021	<p><i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (TI SEPP) aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the TI SEPP outlines the approval requirements for <i>health services facilities</i>.</p> <p>Section 2.61 sets out the criteria for 'development without consent (i.e. matters that do not require consent under Part 4 of the EPAA, but require an environmental assessment under Part 5, i.e. via an REF). Section 2.61 is set out below:</p> <p><i>a. 2.61 Development permitted without consent</i></p> <p><i>(1) Any of the following development may be carried out by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility—</i></p> <p><i>(a) the erection or alteration of, or addition to, a building that is a health services facility,</i></p> <p><i>(b) development for the purposes of restoring or replacing accommodation or administration facilities,</i></p> <p><i>(c) demolition of buildings carried out for the purposes of a health services facility,</i></p> <p><i>(d) development for the purposes of patient transport facilities, including helipads and ambulance facilities,</i></p> <p><i>(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).</i></p>	Yes.

Legislation	Comment	Relevant? Yes/No
	<p>(2) This section does not permit the erection of any building that exceeds 15 metres in height or is located closer than 5 metres to any property boundary (or an addition to a building resulting in the building exceeding that height or being closer than that distance to any property boundary).</p> <p>(3) Despite subsection (2), development may result in a building being located up to 1 metre from a property boundary if—</p> <p>(a) the building does not exceed 1 storey or 5 metres in height, and</p> <p>(b) the land on the other side of the property boundary is not in—</p> <p>(i) a residential zone, or</p> <p>(ii) Zone C4 Environmental Living or a land use zone that is equivalent to Zone C4.</p> <p>Table 7 in Section 5.1 of this report identifies the relevant sections of the TI SEPP that trigger the need to consult in relation to the project.</p> <p>The redevelopment activity fulfils the requirements of this section as:</p> <ul style="list-style-type: none"> The works are proposed within the grounds of an existing health services facility. A hospital is defined as a health services facility under this division as 'health services facility' has the same meaning as in the Standard Instrument LEP. The proposed building works are less than 15m in height. The development activity site is greater than 5 metres from the property boundary. 	
State Environmental Planning Policy (Industry and Employment) 2021	Chapter 3 of State Environmental Planning Policy (Industry and Employment) 2021 includes provisions for the assessment of signage. The proposed works do not include signage requiring assessment under this SEPP.	No
Berrigan LEP 2013 Local Environmental Plan		
Zone	<p>The site is within the RU5: Village Zone. The objectives of the zone are:</p> <ul style="list-style-type: none"> To provide for a range of land uses, services and facilities that are associated with a rural village. To enhance and maintain the unique village character of Berrigan, Barooga, Finley and Tocumwal. To ensure there are opportunities for economic development. To encourage development that relates to tourists and visitors. <p>Health Service Facilities are not expressly permitted with consent.</p> <p>*Clause 2.61(1) 'Development permitted without consent' of the TI SEPP permits development by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility.</p>	Yes
Height of Buildings	<p>There is no numerical maximum building height under the BLEP2013.</p> <p>Clause 2.61(2) of the TI SEPP requires that the proposed buildings not exceed 15m in height.</p> <p>The existing hospital and proposed extension have a maximum height of <12m.</p>	Yes
Floor Space Ratio	There is no numerical floor space ratio control that applies to the site under the BLEP2013.	No
Heritage	There are no items of heritage significance situated on the subject site. The subject site is not within a heritage conservation area.	No
Flood Planning	The site is not identified as flood prone land under the Berrigan Shire LEP 2013.	No
Bushfire	The site is not identified as bushfire prone land.	No

4.7 Strategic Plans

Table 10 below lists any strategic plan that is required to be considered if it is applicable to the proposed activity.

Table 10: Consideration of the Objects of the EP&A Act

Strategic Plan	Assessment	Relevant? Yes/ No
Future Transport Strategy	<p>Does the regional transport plan forecast changes to the regional or local transport networks and operations surrounding the school site? For a regional area, is the public and school bus network mapped and timetables available?</p> <p>The Future Transport Strategy (Future Transport) was released on 5 September 2022. Future Transport updates Future Transport: 2056, to consider events such as the COVID-19 Pandemic, drought, bushfires, flood and global upheaval which have altered the trajectory of many social, economic and cultural trends in NSW. Future Transport provides a refreshed take on the vision established under Future Transport 2056 and outlines a vision and strategy for the management of transport services and infrastructure across NSW.</p> <p>The strategy is underpinned by 14 strategic directions, with associated actions to realise these directions and outcomes. The key outcomes relevant to the project are:</p> <ul style="list-style-type: none"> - Develop an inclusive transport system enabling access to services and places for all. - Successful places for communities 	Yes
Riverina Murray Regional Plan 2041	The Riverina Murray Regional Plan establishes strategic priorities and actions to deliver its land use planning vision, including to 'Strategically plan for health and education precincts'. The proposal will provide an upgraded health facility to support the region which supports this priority.	Yes
Berrigan Shire Local Strategic Planning Statement 2020-2040	<p>The Berrigan Local Strategic Planning Statement was completed in May 2020 which sets out a 20 year vision for the Shire, including key priorities, objectives and broad actions to undertake.</p> <p>The LSPS establishes five planning priorities and associated actions. The priority of Urban amenity directly relates to housing provision and healthy communities is most relevant to the project. The project will support a healthy and vibrant community through the provision of an enhanced health facility.</p>	Yes
Finley Town Masterplan	Endorsed in 2015, the Finley Town Master Plan is a strategic landscape guide used by Council to provide strategic direction for the future use and development of the area. The plan will ensure that the Finley Town develops in a coordinated and orderly manner during the next 25-30 yrs.	Yes

5. Consultation

5.1 Statutory Consultation

Consideration was given to the notification requirements set out in the TI SEPP, refer Table 11. The REF scope of works was notified in accordance with requirements to the stakeholders identified through this process.

Table 11: Stakeholder Notification requirements

Relevant section	Stakeholder
Section 2.10 of the TI SEPP 2021. Consultation with councils—development with impacts on council-related infrastructure or services	Not triggered as no impacts on Council related infrastructure or services.
Section 2.11 of the TI SEPP 2021. Consultation with councils—development with impacts on local heritage	Not triggered as not a heritage item or within a conservation area.
Section 2.12 of the TI SEPP 2021. Consultation with councils—development with impacts on flood liable land	Not triggered as not flood liable land.
Section 2.13 of the TI SEPP 2021. Consultation with State Emergency Service—development with impacts on flood liable land	Not triggered as not flood liable land.
Section 2.14 of the TI SEPP 2021. Consultation with councils—development with impacts on certain land within the coastal zone	Not triggered as the project area is not a coastal vulnerability area.
Section 2.15 of the TI SEPP 2021. Consultation with authorities other than councils	Not triggered as the redevelopment is not a type specified in this section.
Section 2.16 of the TI SEPP 2021. Consideration of Planning for Bush Fire Protection	Not triggered as the site is not bushfire prone land.
Section 2.62(2)(a)(i) of the TI SEPP 2021.	Berrigan Shire Council
Section 2.62(2)(a)(ii) of the TI SEPP 2021.	Occupiers of adjoining land.

Under section 2.62 of the T&ISEPP notification was triggered to Council and occupiers of adjoining land for a period of 21 days. The notification commenced on 30 April 2024 and concluded on 21 May 2024. Copies of the letters issued to Council and the owners of adjoining land are provided at **Appendix R**. No (0) responses were received.

5.2 Community and Stakeholder Engagement

ML HD has prepared a REF Application Engagement Summary Report (**Appendix J**) that outlines the engagement activity undertaken during the planning, design phases.

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

Table 12: Other consultation (non-statutory)

List of community engagement activities	Stakeholder	Date	Feedback	Project Response
Meeting	(Internal) All staff	October 2022	Introductory project briefing	LHD responded to Health Services Plan (HSP). HI responded to budget.
Communication	All	June 2022	Release Project Update Launch Project website	Inform stakeholders
Meeting	(External) Local Government	October 2022	Berrigan Council to be kept informed of the project planning. Council advocated	Regular updates to be provided. MLHD responded to HSP.

List of community engagement activities	Stakeholder	Date	Feedback	Project Response
			community wish for a CT scan and concern about drop in bed number.	
Communication	(External) All	October 2022	Release Project Update Update project website Update social media Media Release	Inform stakeholders
Meeting	(External) Local Health Advisory Committee	October 2022	Project timeframe. Content of HSP and visibility of redevelopment to HSP.	Confirm intention to meet regularly. LHD responded to HSP and noted feedback.
Consultation	(External) Community	November 2022	Concern about adequacy of project budget. CT should be included in the Health Services Plan. Staff accommodation in town is currently insufficient. Staffing is a challenge.	LHD responded to the HSP and operational questions. The planning process will determine affordable scope. More consultation to be held with opportunities for feedback.
Briefing	(External) GPs/Visiting Medical Officers (VMOs)	November 2022	How many consulting rooms will be provided? Requested easy access between Hospital and relocated GP Clinic.	Improved access and number of consult rooms to be determined through planning and design process. The project team will continue to consult with GPs.
Meeting	(External) Aboriginal Community	November 2022	Community provided information about significant local places, language, culture, history.	Architect and landscape architect included all information in the Connecting with Country strategy for consideration in design response.
Consultation	(External) Representatives from stakeholder organisations	February 2023	Provided input into project vision and objectives.	Health planners incorporated stakeholder feedback into project vision and objectives.
Communication	(Internal) All Staff	March 2023	Staff Update	
Briefing	(External) Local Government	April 2023	Sufficiency of funding. Project continuity given change in government. Staffing is an ongoing challenge. Potential reuse of area vacated by GPs for external providers.	The planning process will determine affordable scope. Project is funded and continuing. More consultation to be held with opportunities for feedback. LHD responded to staffing and reuse of existing space.
Briefing	(External) GP/VMOs	April 2023	Project continuity given change in government. Staffing is an ongoing challenge. Potential reuse of area vacated by GPs for external providers.	Project is funded and continuing. More consultation to be held with opportunities for feedback. LHD responded to staffing and reuse of existing space.
Communication	(External) All	April 2023	Release Project Update Update project website Update social media	Inform stakeholders
Briefing	(External) Local Health advisory Committee	May 2023	Questions about project continuity following change in government. Staffing numbers. Endorsement of HSP and services included.	LHD responded to HSP and operational questions. More opportunities for feedback in coming months. Project is continuing.
Functional Briefing (2 rounds)	(Internal) Staff, VMOs	May 2023	Functional Briefs developed including Service scope, functional requirements, operational policies, design requirements, Schedule of Accommodation.	Input into concept design.
Master Plan Workshop	(Internal) Executive User Groups	May 2023	Review and develop master plan options. Master plan options shortlisted for further investigation.	Progress development of shortlisted master plan options.
Master Plan Workshop	(Internal) Executive User Groups	June 2023	Evaluate shortlisted master plan options and select the preferred option.	Progress preferred master plan to Concept Design.

List of community engagement activities	Stakeholder	Date	Feedback	Project Response
Information	(Internal) All Staff	June 2023	Staff Update	Progress design development
Concept design Workshop	(Internal) Executive User Groups	June/Sept 2023	Review and develop concept design. Best concept design options identified for further development.	Progress development of best concept design options.
Briefing	(External) Local Health Advisory Committee	August 2023	Project scope	More consultations to be held with opportunities for feedback when scope and design is released.
Meeting	(Internal) ICT Working Group	September 2023	Development of ICT strategy for concept design. Progress development of concept design option.	Progress development of concept design option.
Meeting	(Internal) Staff	September 2023	Development of engineering services strategy for concept design.	Progress development of concept design.
Meeting	(Internal) Executive User Groups	September 2023	Review and select preferred concept designs.	Confirm preferred concept design to proceed to schematic design.
Meetings	(Internal) Staff	September/October 2023	Suggested adjustments to draft departmental layouts to improve flows, internal adjacencies, functionality.	Update of schematic design to reflect participant feedback. Finalisation of Schematic Design layouts for MLHD sign off.
Consultation	(Internal) All Staff	November 2023	Location, size and number of new inpatient rooms. Alignment of redevelopment with HSP. Non clinical services not in scope. Construction impacts and staging plans to maintaining services. Pharmacy storage.	Bed numbers provided as per HSP. \$25million project funding is allocated to ensure the best return on value and HSP. New room sizes adhere to AuSHFG. Construction will be staged and any changes communicated in advance. Pharmacy storage to be resolved through FFE.
Consultation	(External) Finley community	November 2023	Mixed reaction to design and scope. Request for hydrotherapy pool, post-op rehabilitation centre, quiet mental health assessment room in ED. Want a rehabilitation service for people post-surgery. Beds for palliative care.	Hydro pools are not routinely built as part of redevelopments. MLHD to address services and explore rehabilitation service model of care. ED reconfiguration will include room for mental health assessment. Inpatient rooms will be used flexibly for medical, palliative care.
Communication	(External) All	November 2023	Media Release Project Update Project website Social media	Inform stakeholders.
Consultation	(External) Local Health Advisory Committee	November 2023	The design and scope does not meet expectations. Request for post-op rehabilitation service, quiet mental health assessment room in ED. Noted drop in bed numbers in HSP. Concern about how the plan aligns with CSP.	ED reconfiguration will include room for mental health assessment and create a direct connection between reception and ED. Rooms will be used flexibly for medical, palliative care needs.
Consultation	(External) Berrigan Council	December 2023	The design and scope does not meet expectations. Concern about how the services aligns with HSP.	LHD responded to questions about services and HSP. ED reconfiguration will include room for mental health assessment and create a direct connection between reception and ED.
Consultation	(External) Aboriginal Community	January 2024	Very happy with design concepts presented for building and landscaping and integration of Country. Suggestions provided for local nurseries, plants, and contacts for language approval.	Architect and landscape architect include additional information in the design response and the Connecting with Country strategy.
Consultation	Consultation with Berrigan Shire Council -	10 April 2024	No submissions were received following the notification to Council of the REF.	Progress design development

List of community engagement activities	Stakeholder	Date	Feedback	Project Response
	Finley community information pop-up	14 May 2024	Neutral to positive response to schematic designs, renders, artists impression etc. No major concerns.	Progress design development.
	(External) Finley Community	April/ May 2024	No submissions were received following the notification to occupiers of adjoining land.	Progress design development

6. Environmental Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

Section 171 (1) of the *Environmental Planning and Assessment Regulation (2021)* notes that when considering the likely impact of an activity of the environment, the determining authority must take into account the environmental factors specified in the environmental factors guidelines that apply to the activity.

The *Guidelines for Division 5.1 assessments (June 2022)* apply to the activity. The relevant assessment considerations under Section 3 of these Guidelines are provided in the table below.

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

Relevant Consideration		Response/Assessment		
(a)	Any environmental impact on a community	The redevelopment activity relates to health infrastructure upgrades within the boundaries of the existing Finley Health Service. Finley Health Service is located in proximity to residential dwellings and there is some potential for construction impacts on the community due to increased traffic on Dawe Road, construction noise and dust. However, these impacts will be minor and temporary. There will not be any long-term impacts on the surrounding community from the redevelopment activity. These impacts will be further mitigated through the mitigation measures contained in this REF.	-ve	
			Nil	✓
			+ve	
(b)	Any transformation of a locality	The redevelopment activity will not have a transformational impact on the locality. The redevelopment activity will contribute to addressing the increased need for health care services and strengthen the existing health care facility. The redevelopment activity is complementary to the existing character of the locality, being both within the existing site and of the same land use.	-ve	
			Nil	✓
			+ve	
(c)	Any environmental impact on the ecosystems of the locality	Abel Ecology has prepared a Preliminary Environmental Assessment Report (PEAR) (Appendix E) to assess the likely impacts of the proposal on species and ecological communities present on the site, and whether the proposal requires a Biodiversity Development Assessment Report (BDAR). The report concludes that the site does not contain threatened species and is isolated from intact vegetation areas. A BDAR is not required. The proposed works will result in very minor clearing of vegetation but no tree removal and will not impact on the ecosystems of the locality.	-ve	
			Nil	✓
			+ve	
(d)	Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	The redevelopment will not reduce the aesthetic, recreational, scientific, or other environmental quality or value of a locality. The development activity will include landscaping (refer plans at Appendix K) which will positively contribute to the broader aesthetic of the site. The aesthetic of the site will be further enhanced through the modest addition to the existing building and the replacement of the roof.	-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	The redevelopment activity will not have a material impact on these elements. Further: <ul style="list-style-type: none">No items registered on the National Heritage List (NHL) were identified in the study area.No items registered on the Commonwealth Heritage List (CHL) were identified in the study area.No items registered on the Register of the National Estate (RNE) were identified in the study area.	-ve	
			Nil	✓
			+ve	
			-ve	

Relevant Consideration		Response/Assessment		
(f)	Any impact on the habitat of protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>)	The site has mostly been cleared or disturbed. There are few remnant local native trees. The PEAR (Appendix E) concludes that the site does not provide habitat for threatened species or populations.	Nil	✓
			+ve	
(g)	Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air	The PEAR accompanying this REF (Appendix E) confirms that the site does not have any vegetation mapped as having Biodiversity Value and it does not provide habitat for threatened species. The proposed works will not endanger any animal or plant species.	-ve	
			Nil	✓
			+ve	
(h)	Any long-term effects on the environment	The redevelopment activity will not result in any long-term effects on the environment.	-ve	
			Nil	✓
			+ve	
(i)	Any degradation of the quality of the environment	The redevelopment activity will not result in any degradation to the quality of the environment. Mitigation measures are provided in Appendix AA to ensure that construction activities will not cause pollution or contamination.	-ve	
			Nil	✓
			+ve	
(j)	Any risk to the safety of the environment	The risk of noise and vibration, air, water, soil and light pollution arising from carrying out the works will be mitigated by the implementation of a Construction Management Plan. There may be short term negative amenity impacts but there will be no long-term degradation of the quality of the environment as a result of the redevelopment.	-ve	
			Nil	✓
			+ve	
		The development activity will not present any risk to the safety of the environment. Mitigation measures are contained in the Preliminary Construction Management Plan at Appendix P and provided in Appendix AA to ensure that construction activities will not cause pollution or contamination.		
(k)	Any reduction in the range of beneficial uses of the environment	The development activity will facilitate improved infrastructure within the existing health facility and will not limit or reduce the range of beneficial uses of the environment. The proposed landscaping works will enhance the external environmental.	-ve	
			Nil	✓
			+ve	
(l)	Any pollution of the environment	The development activity will not present any significant risk to the safety of the environment. Mitigation measures are provided in Appendix AA to ensure that construction activities will not cause pollution or contamination. A detailed Construction Waste Management Plan will be implemented to ensure waste is disposed of in a respectful manner.	-ve	
			Nil	✓
			+ve	
(m)	Any environmental problems associated with the disposal of waste	The construction of the redevelopment will be carried out in accordance with a Construction Waste Management Plan. All construction works associated with the proposal will be undertaken in accordance with a Construction Management Plan.	-ve	
			Nil	✓
			+ve	
(n)	Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply	The development activity will incorporate a range of ESD principles which will limit demands on natural resources. These include: <ul style="list-style-type: none"> Using a range of local endemic and regional endemic plant species and habitats to improve biodiversity Selecting fixtures and fittings with high water and energy efficiency ratings Locally sourcing FSC timber Inclusion of photovoltaic cells for solar electricity generation Using natural materials and limiting materials with a high carbon footprint 	-ve	
			Nil	✓
			+ve	
(o)	Any cumulative environmental effect with other existing or likely future activities	The development activity is contained entirely within the site boundary. The KWA is located away from the health service building and the proposed activities will not conflict. All construction works associated with the proposed activity and with the KWA project will be undertaken in accordance with a Construction Management Plan. Therefore cumulative construction related impacts are not expected.	-ve	
			Nil	✓
			+ve	
		Not relevant. The works are not located in an area of coastal risks and/or hazards.	-ve	

Relevant Consideration	Response/Assessment		
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions		Nil	✓
		+ve	
(q) Any applicable local strategic planning statement, regional strategic plan or district strategic plan made under the Act, Division 3.1	The redevelopment is consistent with the strategic policies identified in Section 4.7 of this REF.	-ve	✓
		Nil	
		+ve	
(r) Any other relevant environmental factors	There are no other relevant environmental factors	-ve	
		Nil	✓
		+ve	

7. Summary of Impacts

Any likely impacts relating to the proposed activity have been considered and are discussed in Table 14 below. All issues relating to the project are largely minor and will not cause significant impact as a result of the proposed activity. All mitigation measures relating to the project are provided in **Appendix AA**.

Table 14 Summary of impacts relating to the activity

Issue	Discussion
Traffic access and parking	The GHD Engineering Concept Engineering Report (Appendix M) confirms there is sufficient parking on site to satisfy the existing demand and no changes to the existing car parking are proposed as part of the redevelopment. Ambulance access to the site will be maintained during construction. Traffic and parking arrangements will remain unchanged with some resurfacing and formalised parking line marking potentially implemented (subject to available budget.) The proposed activity will not include additional staff, therefore there is not anticipated to be any impact on the traffic and parking demands on the site. Street parking on Dawe Avenue is available for overspill should it be required.
Noise and vibration	<p>All aspects of the redevelopment acoustic design will be completed in accordance with the NSW Health Engineering Services Guide (NSW Health 2022).</p> <p>GHD has completed a Noise and Vibration Impact Assessment (Appendix Q). This report provides an assessment of construction and operational and acoustic impacts from the proposal to neighbouring land uses. Construction noise modelling results indicated exceedances of up to 18dB during construction works to some of the identified sensitive residential receivers. Noise levels are not predicted to exceed the Highly Noise Affected criteria (75 dBA) during all stages of work at the identified receivers. As the nearest residential receiver is around 400m from the project area, impacts to residential receivers are not expected. Works will only take place during standard construction hours and therefore will not interrupt night time comfort or sleep to adjacent users. Note that modelled results were based on the incorporation of recommended noise mitigation measures.</p> <p>Section 6.4 of the report recommends mitigation measures for Noise and vibration impacts. These include the preparation of a Construction Noise and Vibration management plan (CNVMP). Mitigation measures have been included at Appendix AA.</p> <p>The impacts of construction noise and vibration on surrounding receivers will be temporary. Subject to the implementation of the mitigation measures including effective communication and consultation, the impacts are considered manageable and not likely to result in significant adverse impacts.</p>
Air quality and environment	The proposed works are minor and it is not expected to result in adverse impacts to air quality. Any dust impacts can be managed through implementation of standard construction management measures. These are set out in the Preliminary Construction Management Plan (refer Appendix P) are detailed in the Mitigation Measures at Appendix AA .
Soils and geology	<p>JK Geotechnics prepared a Geotechnical Report for the site in conjunction with the site contamination investigations (refer Appendix L). It is noted that this report was prepared on the basis that more extensive demolition and construction works would be undertaken, however the principles within it are still applicable.</p> <p>The report found that the site has a generalised profile of fill overlying alluvial silty clay and then sandier material at depth. JK provides recommendations and strategies to appropriately address site preparation and earthworks, excavation conditions and support, footings, earthquake design, soil aggression, mine subsidence and pavement parameters. The JK recommendations should be used to inform the structural design of the proposed development.</p>

Issue	Discussion
Coastal risks	Not relevant. The works are not located in an area of coastal risks and/or hazards.
Hydrology, flooding and water quality	<p>The site does not contain watercourses. The new roof will be provided with downpipes connecting to the existing stormwater system. The proposed works are therefore acceptable and will have minimal impacts from a hydrology and water quality perspective.</p> <p>The site is not identified on Berrigan Shire's flood prone land mapping. GHD has prepared a flooding assessment (Appendix S) which has found:</p> <ul style="list-style-type: none"> The existing hospital building and extension are not inundated in the 1 in 100 AEP event or in the 1:200 (climate change scenario) event. The Probable Maximum Flood (PMF) results flood depths of 0.06m were shown in the location of proposed extension, resulting in a flood level of 108.8 m AHD. This is about 0.1 m below the existing floor level. In the PMF the hospital building remains 0.1m above the flood levels in Dawe Avenue. Peak flood velocity in the area of the extension at the PMF is negligible, at 0.08 m/s. In the PMF event flood depths are shallow, and flood waters are slow moving, and therefore any impacts would be negligible. Flood Hazard is classified as "H1" at the site of the extension suggesting it is generally safe for people, vehicle and buildings. The PMF event is an extremely rare event, with a low probability of occurring. <p>Recommendation 28 of the 2022 Independent Flood Inquiry directed that to minimise disruption to medical services, aged care services and the police, Government should <i>ensure hospitals, medical centres, nursing homes, aged care facilities and police stations are situated above the probable maximum flood level</i>.</p> <p>The NSW Government The response recognised the importance of future essential services infrastructure development occurring above the flood planning level, but with the caveat that this would be done where appropriate. Recommendation 28 was therefore supported in principle, with further work required on implementation.</p> <p>The PMF event will result in minor flood affectations near the site of the extension, but the flood levels will remain 0.1m below the finished floor level. The proposed works are a minor extension to an existing health facility building and are to be constructed at 108.9m AHD to match existing finished floor levels. Constructing the extension above the PMF would result in internal accessibility issues within the hospital, and the project scope does not allow for relocation of the entire facility above the PMF. On balance, the flooding impacts associated with the proposed developed are considered acceptable given the low level of risk identified.</p>
Visual amenity	The proposed development of the site will not have visual impact. The proposed landscaping works have been designed from Connecting with Country principles and will be incorporated to complement the existing vegetation within the site. Building materials for the new main entrance and IPU extension have been designed to complement the current materials of the existing hospital. The landscape works are designed to be viewed from internal spaces providing a green outlook and connection to the outdoors from clinical spaces.
Aboriginal heritage	An Aboriginal Heritage and Due Diligence Assessment was prepared by NGH Environmental (Appendix U). This report states no Aboriginal sites, objects or places, or areas of potential Aboriginal archaeological sensitivity were identified within the site area during the site inspection. The report concludes that the site contains a negligible potential for Aboriginal objects or archaeological deposits and no further assessment is required.
Non-Aboriginal heritage	The site is not a listed heritage item or within a heritage conservation area. A Statement of Heritage Impact was prepared by NGH Environmental (Appendix V). This report confirms Finley Health Service does not meet any of the criteria for heritage listing at State or Local level. The redevelopment will not have a negative overall heritage impact on the hospital or the surrounding areas. The proposed works will not result in overall significant physical or visual impact on any items of surrounding heritage.
Ecology	<p>A PEAR accompanies this REF (Appendix E) and assesses the potential ecological impacts of the development activity.</p> <p>Within the area investigated, no State or Federally listed threatened species or populations were recorded. Similarly, no habitat for those threatened species previously recorded within the vicinity of the site were observed within, or close to, the limits of the proposed works. No threatened fauna were recorded in association with the area investigated.</p>

Issue	Discussion
	<p>An Arboricultural assessment was undertaken by Wade Ryan Consulting (Appendix W) and 82 trees within and close to the site were individually assessed and graded for their value, condition, life expectancy, significance within the environment and landscape; stem diameter, canopy coverage and other salient data was gathered and compiled. The assessment found that the site has mostly been cleared or disturbed. There are few remnant local native trees that mostly occur beyond the southern boundary, with some just inside the southern and northern boundaries. The proposal will not result in the removal of any trees. No trees graded as priority for retention are impacted.</p> <p>The only identified impacts expected to the existing tree population are potential impacts to the tree protection zone to trees 30, 32 and 33 from footpath construction. In ground services construction will be located beyond the tree drip lines. Mitigation measures have been included at Appendix AA to protect trees as well as recommendations to remove T12 as it is an exotic High Threat Weed (Cockspur Coral Tree (<i>Erythrina crista-galli</i>)) and is of poor condition, declining, with a short life expectancy.</p> <p>The proposed landscaping works will increase the amount of native vegetation on the site. The proposed works will not result in any adverse impacts on ecology .</p>
Bushfire	Not relevant. The subject site is not listed on bushfire prone land.
Land uses and services	<p>The works do not impact (change) the overarching land use activity of a health services facility. During construction works the hospital will continue to operate and noise and vibration mitigation measures will be implemented to reduce acoustic impact for staff and patients.</p> <p>The proposed alterations and extension to existing operational spaces and the relocation of the Medical Imaging Department to have to have a close adjacency to the ED and FoH will require temporary relocation of some services to facilitate the works. The proximity of the new works to operational spaces will require management to ensure that clinical services can be safely maintained on-site, and the building / engineering services facilitate service continuity throughout the construction period.</p> <p>The IPU will be impacted by the new IPU extension, likely requiring the nearest bedroom to be taken offline for a period during construction. The replan of the IPU staff station support area is required to allow for the new corridor link between FoH & ED. Upgrades to the Emergency Department will require some existing treatment beds to be temporarily relocated.</p> <p>To permit the construction of the new FOH and Imaging, a temporary main entrance will be established through the existing IPU veranda and decanted bedrooms. The existing Imaging is located away from the new works so will not be impacted. Ambulatory care will remain in the community building unimpacted by the works.</p>
Waste generation	<p>The works will result in waste arising from the minor building works, as well as construction waste (packaging and excess materials) arising from the building process. In accordance with the recommended Mitigation Measures (Appendix AA) the Principal Contractor will be required to prepare a Construction Waste Management Plan to address the disposal of resultant waste, which should maximise sorting of waste materials and packaging to ensure maximum recycling is achieved. Any hazardous waste arising from building demolition will be required to be disposed of in accordance with EPA Guidelines. All waste removed from site will be tracked through waste documents and/or monthly waste reports provided by the contractor.</p> <p>The operation of the facility will not result in any new or significant increase in waste generation, including hazardous waste. There will be no change to existing waste management storage arrangements or collection arrangements. Waste removed from the development will be transported to an approved waste or recycling facility.</p>
Hazardous materials and contamination	<p>JK Geotechnics has undertaken a Preliminary Site Investigation (Appendix F) and a DSI (Appendix G) at the site. The investigations identified redundant underground storage tanks (USTs) and odorous fill soils in the south of the site. The investigations concluded that there was potential for localised impacts to be encountered in the vicinity of the USTs and associated infrastructure. Contamination posing an unacceptable risk was not identified near the USTs, however, it was suspected that localised impacts may exist. JK Geotechnics subsequently prepared a RAP (Appendix H) which outlines requirements for remediation of the UST area by remediation and in situ abandonment of the tanks and any associated infrastructure such as pipework, impacted tank pit backfill, and any unacceptably impacted soils at the base and walls of the tank pits, to the extent practicable. Where associated infrastructure cannot be removed, it is to be decommissioned in-situ.</p> <p>The RAP concludes that risks associated with the USTs can be mitigated via remediation and the implementation of the RAP. The residual risks will be assessed by the validation process. A validation report is to be prepared on completion of remediation activities. If contaminated material is capped on site a long-term Environmental Management Plan (EMP) will also be prepared as part of the validation documentation.</p> <p>JK Environments Hazardous Materials Report (HMR) (Appendix I) concludes that the site contains various hazardous materials. This is consistent with the findings of an earlier hazardous materials survey. The HMR includes recommendations including safety procedures to safely remove the hazardous materials before and during construction works to cause minimal environmental impact.</p> <p>Mitigation measures have been recommended (Appendix AA) to ensure compliance with the recommendations of the contamination investigations.</p>

Issue	Discussion
Sustainability and climate resilience	<p>GHD has prepared a Sustainable Development Strategy (Appendix T) that summarises the main sustainability requirements applicable to the development. The proposed works will meet the identified ESD requirements as well as the requirement of HI Design Guidance Note (DGN) 58.</p> <p>Sustainability initiatives considered include photo voltaic cells, incorporation of water and energy efficient fixtures and fittings, recycling of waste building materials and light coloured roof sheeting to reduce solar absorption and the heat island effect. The health facility will not rely on fossil fuels to support meeting the NSW Government target of Net Zero by 2050. Beyond meeting the stated requirements, the initiative proposed will result in several operational and environmental benefits for HI NSW and several the future staff and facility users.</p>
Community and social impact	<p>The redevelopment will support the ongoing operation of the health services facility, therefore broader positive social and community impacts. Positive Impacts regarding community and social that will derive from the redevelopment include:</p> <ul style="list-style-type: none">• Deliver a health service that contributes and connects to the Finley Health Hub that can be valued by the community• Strengthen health service integration with NGO, LHD and cross border service networks, providing better access to services for residents of Finley and its surrounds• Support the delivery of safe, high-quality, clinical services and contemporary models of care that are designed around the needs and experiences of consumers and providers• Achieve a clinically and culturally safe, welcoming, and flexible adaptable environment in which to deliver and receive care into the future and;• Provide a pleasant work environment and staff amenities that shows workforce is valued, promotes a collaborative working environment, and contributes to recruitment, attraction, and retention of skilled staff.
Cumulative impacts	<p>The cumulative impacts of the development activity will be minimal. The development activity is comprised entirely within the boundaries of an existing health services facility. There have been no significant approvals or current development activity that relate to sites in the immediate vicinity (i.e. beyond the hospital site) that would contribute to any significant cumulative impacts.</p>

8. Summary of Mitigation Measures

Mitigation measures are to be implemented for the proposal to reduce impacts on the environment. The mitigation measures are provided at **Appendix AA**.

Based on the assessment in the preceding subsections of this REF, the main areas requiring specific management of mitigation relate to:

- Construction noise and vibration mitigation and management
- Management of hazardous materials during demolition works.

8.1 Summary of Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed development, it is determined that:

- The extent and nature of potential impacts are low, and will not have significant adverse effects on the locality, community and the environment;
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community; and
- Given the above, it is determined that an EIS is not required for the proposed development activity.

9. Justification and Conclusion

The proposed partial refurbishment and extension of the existing health service facility at 24 Dawe Avenue Finley New South Wales 2173 is subject to assessment under Part 5 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

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

As outlined in this REF, the proposed activity can be justified on the following grounds:

- It responds to an existing need within the community;
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the proposal are not likely to be significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5 of the EP&A Act. On this basis, it is recommended that HI determine the proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this report.