



# Griffith Base Hospital Redevelopment

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State Significant Development Assessment Report  
SSD-9838218

October 2021



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Title: Griffith Base Hospital Redevelopment

Cover image: *Perspective view of the proposed Clinical Services Building (source: DJRD Architects)*

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# Glossary

Abbreviation	Definition
AHD	Australian Height Datum
BCA	Building Code of Australia
CIV	Capital Investment Value
Council	Griffith Council
CSB	Clinical Services Building
Department	Department of Planning, Industry and Environment
EESG	Environment, Energy and Science Group
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
FSR	Floor Space Ratio
GLEP	Griffith Local Environmental Plan 2014
GFA	Gross Floor Area
Heritage	Heritage NSW, Department of Premier and Cabinet
LEP	Local Environmental Plan
Minister	Minister for Planning and Public Spaces
NCS	Non-Clinical Services

RMS	Roads and Maritime Services, TfNSW
SEARs	Planning Secretary's Environmental Assessment Requirements
Planning Secretary	Secretary of the Department of Planning, Industry and Environment
SEPP	State Environmental Planning Policy
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
SVPCH	St Vincents Private Community Hospital
TfNSW	Transport for NSW

# Executive Summary

This report provides an assessment of a State significant development (SSD) application for the redevelopment of the Griffith Base Hospital (GBH) (SSD-9838218) at 1 Noorebar Avenue, Griffith. The Applicant is NSW Health Infrastructure (on behalf of Health Administration Corporation). The proposal is located within the Griffith local government area (LGA).

## Assessment summary and conclusions

The proposal will provide new integrated hospital facilities to improve the efficient operation of the hospital and support the healthcare needs of Griffith and surrounding communities. The Department concludes the proposal is in the public interest and recommends the application be approved, subject to conditions.

The Department has considered the merits of the proposal in accordance with relevant matters under section 4.15(1) and the objects of the *Environmental Planning and Assessment Act* 1979 (EP&A Act), the principles of Ecologically Sustainable Development (ESD), and issues raised in all submissions as well as the Applicant's response to these.

The Department identified built form and urban design, traffic and parking and noise and vibration as key issues in the assessment. The Department's assessment concluded:

- the built form is appropriate for the site and would contribute to the identity and future character of the hospital precinct, and the design is supported by the NSW Government Architect.
- the proposal provides a high-quality landscape outcome and improved pedestrian amenity and environmental outcomes on the site.
- the traffic generated by the proposal can be accommodated on the surrounding road network and the separation of functional access for public and hospital vehicles would improve pedestrian and traffic safety in and around the site.
- the proposal provides sufficient car parking on the site to meet the demand generated by the redevelopment of the site.
- noise impacts associated with the development can be appropriately mitigated, subject to the detailed design incorporating acoustic attenuation measures to achieve recommended noise limits and the preparation of construction noise and vibration management plans.

The impacts of the proposal have been addressed in the Environmental Impact Statement (EIS) and the Response to Submissions (RtS). Conditions of consent are recommended to ensure that the identified impacts are managed appropriately.

## The proposal

The proposal seeks approval for the construction and operation of a three and four storey Clinical Services Building (CSB) including inpatient, surgical, ambulatory care and critical care services and the provision of a clinical link to the St Vincents Private Community Hospital (SVPCH) and the Non-Clinical Services (NCS) Building. The proposed site works include demolition of existing buildings, new internal access roads and carpark areas, tree removal, remediation, landscaping, stormwater drainage, utility works and signage.

The proposal has a Capital Investment Value (CIV) of \$169,514,969 million and will result in the delivery of 172 jobs during the construction phase and an additional 86 jobs in operation, resulting in a total of 441 ongoing operational jobs.

### **The site**

The GBH is identified as 1 Noorebar Avenue Griffith with other street boundaries to Warrambool Street and Animoo Avenue. The site is legally described as Lot 2 in Deposited Plan 1043580 and is located 700m north of Banna Avenue, the main street of Griffith, in a largely suburban residential context.

### **Statutory context**

The proposal is SSD under clause 14 of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011, as it is development for the purpose of a hospital with a CIV of more than \$30 million. Therefore, the Minister for Planning and Public Spaces is the consent authority.

### **Engagement**

The application was publicly exhibited between Friday 30 April 2021 until Thursday 27 May 2021. The Department of Planning, Industry and Environment (the Department) received a total of six submissions from public authorities. No submissions were received from the public. An additional four submissions from public authorities were received in response to the Applicant's Response to Submissions (RtS).

The key issue raised in the submissions relates to traffic and safety concerns associated with the proposed emergency vehicle access in Warrambool Street and its proximity to existing school and church uses.

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# 1 Introduction

This report provides an assessment of a State significant development (SSD) application for redevelopment of the Griffith Base Hospital (GBH) at 1 Noorebar Avenue, Griffith (SSD-9138828).

The proposal seeks approval for:

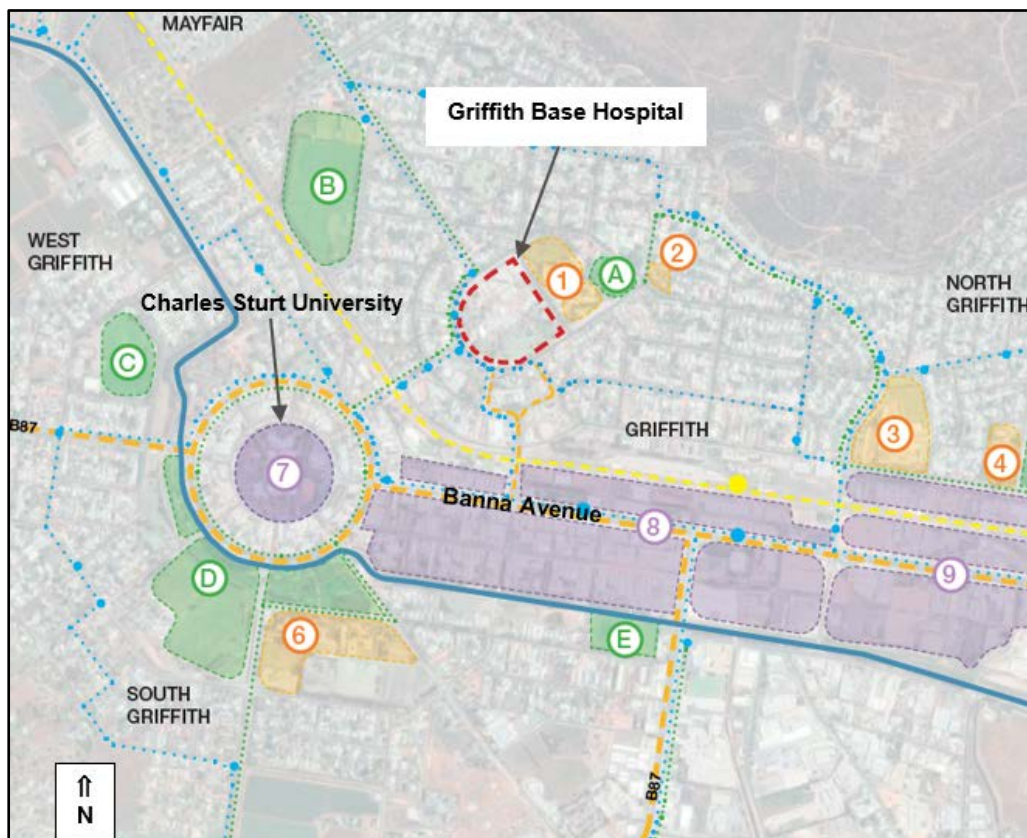
- construction and operation of a three and four storey Clinical Services Building (CSB).
- provision of a clinical link to the St Vincents Private Community Hospital (SVPCH) and the Non-Clinical Services (NCS) Building.
- new internal access roads and car parking areas.
- tree removal.
- demolition, remediation, landscaping, stormwater drainage and utility works.
- new signage.

The application has been lodged by NSW Health Infrastructure (on behalf of Health Administration Corporation, the Applicant). The site is located within the Griffith LGA.

## 1.1 Site description

Griffith is a major regional city in the Riverina area of New South Wales, located approximately 360km north-west of Canberra and 180km north-west of Wagga Wagga.

The site is legally described as Lot 2 in Deposited Plan 1043580 and is located 700m north of Banna Avenue, the main street of Griffith, in a largely suburban residential context (refer to **Figure 1**).



**Figure 1** | Local context map (Source: EIS)



The GBH is located on a D-shaped block with an area of approximately 6.4 hectares, excluding the private lots containing St Vincent's Private Community Hospital (SVPCH) owned by Council and operated by St Vincent's and the Griffith Medical Centre and Laverty Pathology.

The existing hospital comprises a tightly arranged series of buildings of varying ages and conditions connected by corridors and covered walkways. The buildings are clustered towards the centre of the site and set back from the street frontage along Animoo Avenue, Noorebar Avenue and Warrambool Street.

The main public entry and parking area and emergency vehicle access is from Noorebar Avenue to the south. The service and delivery vehicles access is from Animoo Avenue to the north at the rear of the hospital. Separate vehicle entries also exist for staff accommodation and the Children's Ward in Animoo Avenue and the Maternity Ward and Nurses Building in Warrambool Street.

The development on the site has occurred in a piece-meal manner over a long period of time, which has resulted in poor building transition and accessibility, excessive travel distances between clinical services and limits to the efficiency of clinical operations. The existing hospital building arrangement is illustrated in **Figure 2**.



**Figure 2 | Existing hospital building layout (Source: EIS)**

## 1.2 Surrounding development

The site is located within a predominantly suburban residential context, except for the land to the east, which is occupied by the St Patricks Primary School and the Sacred Heart Church.

The land immediately to the south is predominately characterised by low scale dwellings interspersed with other land uses including, Griffith Uniting Church, St Alban Anglican Church, UNSW Rural Medical School and the Community Kids Childcare Centre.

The land immediately to the west is predominately characterised by low scale dwelling houses. Further west, at the westernmost edge of the town centre, is the Charles Sturt University and the TAFE NSW Riverina Institute Griffith Campus.

The land immediately to the north is predominately characterised by low scale dwelling houses. Further north, approximately 3km from the site, is Griffith City Airport.

## 2 Project

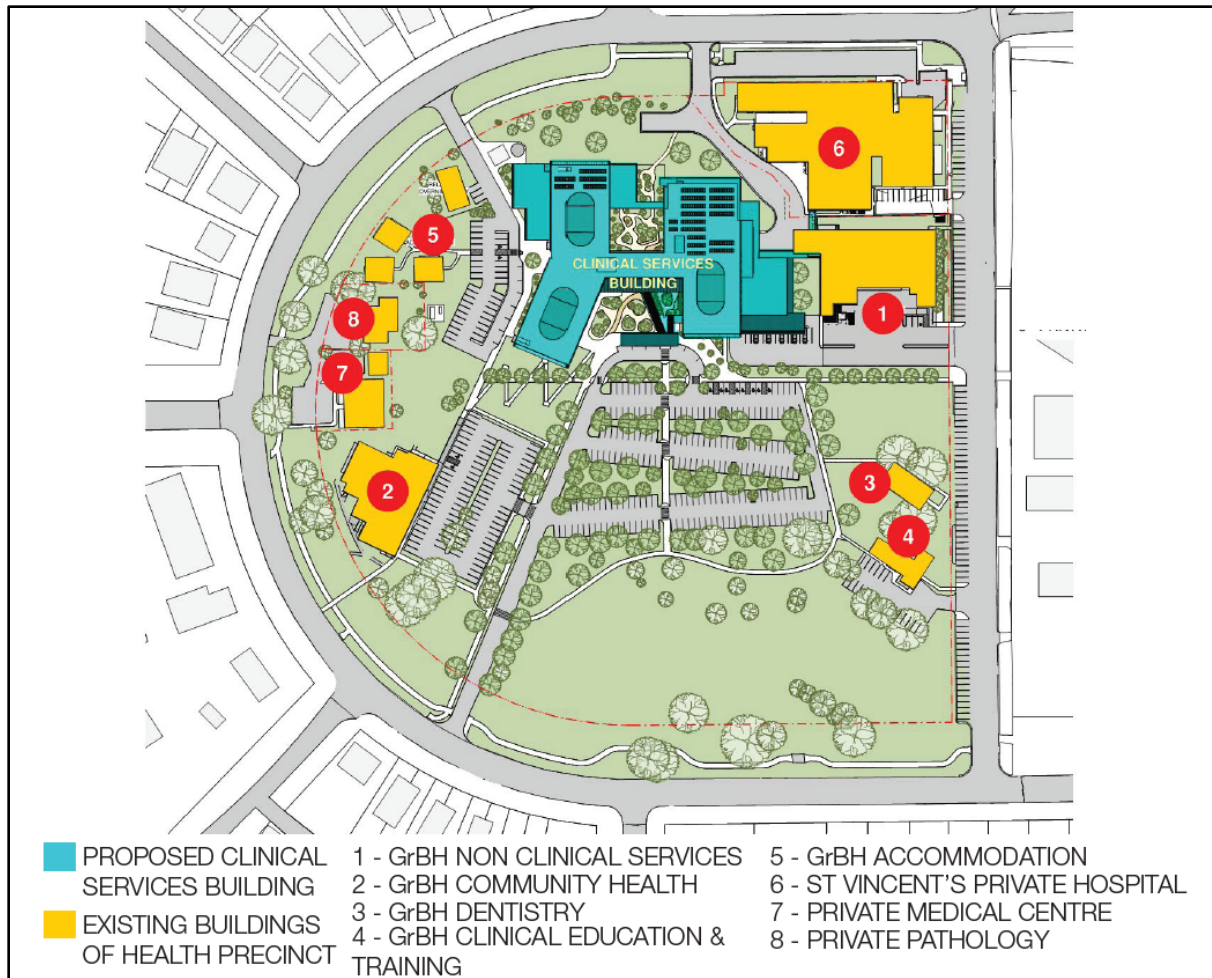
The key components and features of the proposal are provided in **Table 1** and are shown in **Figures 3 to 6**.

**Table 1 | Main components of the project**

Aspect	Description
Project summary	Construction and operation of a CSB and associated site works including demolition of existing buildings, new internal access roads and car park areas, tree removal, remediation, landscaping, stormwater drainage, utility works and signage.
Built form	3 to 4 storeys (max. 22.59m – western wing)
Site area	64,023sqm
Gross floor area (GFA)	15,934sqm
Uses	CSB, including: <ul style="list-style-type: none"> <li>• emergency department</li> <li>• critical care unit</li> <li>• maternity and birthing unit</li> <li>• paediatric unit</li> <li>• perioperative unit</li> <li>• inpatient and outpatient units</li> <li>• wellness centre</li> <li>• aged care and rehabilitation unit</li> <li>• support services (including medical imaging, pharmacy; pathology and medical records)</li> <li>• administration and ancillary retail.</li> </ul>
Number of hospital beds	117
Vehicle Access	<p><u>Noorebar Avenue</u></p> <ul style="list-style-type: none"> <li>• new vehicle access to the main carpark and public entry to the hospital.</li> </ul> <p><u>Animoo Avenue</u></p> <ul style="list-style-type: none"> <li>• vehicle access (existing) to a new staff carpark.</li> </ul> <p><u>Warrambool Street</u></p> <ul style="list-style-type: none"> <li>• new emergency vehicle and service vehicle access (logistics area).</li> <li>• vehicle access (existing) to a new carpark for the Nurses Education Building.</li> </ul>
Parking	<ul style="list-style-type: none"> <li>• 357 car spaces (345 standard and 12 accessible)</li> <li>• 30 bicycle spaces</li> </ul>
Public domain and landscaping	<p>The key public domain and landscaping works include:</p> <ul style="list-style-type: none"> <li>• new building public entry forecourt</li> </ul>

Aspect	Description
	<ul style="list-style-type: none"> <li>landscaped courtyards and terraces</li> <li>through site link plaza</li> <li>site wide circulation, including pathways, seating and lawn areas</li> <li>tree planting – 26 new trees.</li> </ul>
Hours of operation	<ul style="list-style-type: none"> <li>24 hours a day, seven days a week</li> </ul>
Signage	<p>The main signage includes:</p> <ul style="list-style-type: none"> <li>1 x freestanding identification sign (4.2m high x 1.5m wide)</li> <li>1 x freestanding identification sign (1.5m high x 1.5m wide)</li> <li>1 x freestanding pedestrian wayfinding (1.8m x 0.6m)</li> <li>1 x building identification sign on the façade at the main hospital entry (17.78m wide x 0.8m high).</li> </ul>
Jobs	172 construction jobs and 86 additional operational full-time jobs
CIV	\$169,514,969





**Figure 3 | Proposed site layout (Source: EIS)**



**Figure 4 | Perspective view (Source: EIS)**





**Figure 5 |** Perspective view (Source: EIS)



**Figure 6 |** Perspective view (Source: EIS)

## **2.1 Physical layout and design**

The proposed CSB will be located in the northern part of the site to allow for a physical connection to the SVPCH. The southern part of the site will be maintained as the principal public entry with at-grade parking areas and landscaped open space.

The building design incorporates two wings that run north-south connected by an interlinking east-west corridor. The building configuration creates the opportunity for the introduction of landscaped courtyards separating the built form, which provide good amenity in terms of access to light and

outlook from the hospital rooms. The proposed layout and design will improve the efficiency of hospital operations by consolidating the clinical services in a purpose designed building with logical zoning and co-location of the clinical uses.

## 2.2 Timing

The proposed redevelopment will involve progressive demolition of existing structures followed by the construction of the CSB and several ancillary services buildings. A large car parking area will be constructed at the southern end of the site. The proposed works are scheduled to commence in the first quarter of 2022 and to be completed in 2025.

The proposed staging of the development is summarised in **Table 2** and illustrated in **Figure 7**.

**Table 2 | Proposed construction staging**

Stage	Description	Estimated Timeframe
1	<ul style="list-style-type: none"> <li>demolition of Building 25.</li> <li>relocation of mechanical plant within main works boundary.</li> <li>installation of new site infrastructure (substation / generator / fire system).</li> <li>construction of new CSB.</li> <li>linkages to Non-Clinical Services Building, SVPCH and western carpark.</li> <li>northern landscape works.</li> </ul>	First quarter of 2022 to third quarter of 2024
2	<ul style="list-style-type: none"> <li>demolition of Buildings 15 and 22.</li> <li>construction of southern courtyard and ambulance entry.</li> </ul>	Third quarter of 2024 to fourth quarter of 2024
3	<ul style="list-style-type: none"> <li>demolition of existing CSB and adjoining structures.</li> <li>demolition of existing carpark.</li> <li>modification of driveway to Noorebar Avenue.</li> <li>construction of new public carpark and landscape works.</li> </ul>	Fourth quarter 2024 to second quarter 2025
4	<ul style="list-style-type: none"> <li>removal of mobile Renal Building (Building 31).</li> </ul>	First quarter 2025 to second quarter 2025
5	<ul style="list-style-type: none"> <li>removal of temporary carpark.</li> <li>complete landscape works.</li> </ul>	Second quarter 2025 to third quarter 2025







### 3 Strategic context

The Griffith Base Hospital is located within the Murrumbidgee Local Health District (MLHD) District and is integral in delivering health services to the Riverina region of New South Wales.

The primary objective for the redevelopment of the GBH is to replace existing outdated buildings with an integrated and contemporary healthcare facility to improve the efficient operation of the hospital and support the healthcare needs of Griffith and surrounding communities.

The proposal will deliver a new purpose designed CSB with expanded inpatient, surgical, ambulatory care and critical care services. It will also enable the relocation of clinical services currently delivered off site, including an aged care and rehabilitation unit to meet the needs of the ageing population.

The Department considers that the proposal is appropriate for the site given it is consistent with:

- NSW Premier's Priorities because it will deliver critical hospital infrastructure and improved health facilities and services for the region.
- Infrastructure NSW's *State Infrastructure Strategy 2018 – 2038 Building the Momentum* as it facilitates investment in health infrastructure to support the needs of the population.
- the Riverina Murray Regional Plan 2036 as it recognises Griffith as a regional hub for health and education and recommends the establishment of a health precinct around the GBH and SVPCH.
- Griffith Council's Local Strategic Planning Statement, as it supports the master planned Health and Education Precinct around GBH and SVPCH and increase its prominence as a regional centre for health and education.

The proposal will result in the delivery of 172 jobs during the construction phase and an additional 86 jobs in operation, resulting in a total of 441 operational jobs.

## 4 Statutory context

### 4.1 State significance

The proposal is SSD under section 4.36 (development declared SSD) of the Environmental Planning and Assessment Act 1979 (EP&A Act) as the development has a CIV in excess of \$30 million and is for the purpose of a hospital under clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011.

The Minister is the consent authority under section 4.5 of the EP&A Act.

In accordance with the Minister for Planning and Public Spaces' delegation to determine SSD applications, signed on 26 April 2021, the Director, Social and Infrastructure Assessments may determine this application as:

- the relevant Council has not made an objection.
- there are less than 15 public submissions in the nature of objection.
- a political disclosure statement has not been made.

### 4.2 Permissibility

The site is identified as being located within the R1 General residential zone by the Griffith Local Environmental Plan (GLEP) 2014. The proposed development is defined as a health services facility, which is permissible with consent within the zone. Therefore, the Minister for Planning and Public Spaces or a delegate may determine the carrying out of the development.

### 4.3 Other approvals

Under section 4.41 of the EP&A Act, a number of other approvals are integrated into the SSD approval process, and consequently are not required to be separately obtained for the proposal.

Under section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any development consent for the proposal (e.g. approvals for any works under the *Roads Act 1993*).

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent (see **Appendix D**).

### 4.4 Mandatory matters for consideration

#### 4.4.1 Environmental planning instruments

Under section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument (EPI) that is of relevance to the development the subject of the development application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs that substantially govern the project and that have been considered in the assessment of the project.

The Department has undertaken a detailed assessment of these EPIs in **Appendix B** and is satisfied the application is consistent with the requirements of the EPIs.

#### 4.4.2 Objects of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent) are to be understood as powers to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at **Table 3**.

**Table 3 | Response to the objects of section 1.3 of the EP&A Act**

Objects of the EP&A Act	Consideration
(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 development would ensure the proper management and development of the existing hospital and provide significant social and economic benefits to the community and the State.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development (ESD).  ESD is discussed in <b>Section 4.4.3</b> .
(c) to promote the orderly and economic use and development of land,	The proposal promotes the orderly and economic use and development of the land by delivering improved health infrastructure for the State. The development would economically benefit the community through new jobs and infrastructure investment.
(d) to promote the delivery and maintenance of affordable housing,	Not applicable.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposal includes tree removal to make way for the development. A Biodiversity Assessment submitted with the application confirms one ecosystem credit and one species credit is required to offset the removal of vegetation (refer to discussion in <b>Section 6.1</b> ).
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The proposed development is not anticipated to result in any unacceptable impacts upon built and

Objects of the EP&A Act	Consideration
	cultural heritage, including Aboriginal cultural heritage (refer to discussion in <b>Section 6.4</b> ).
(g) to promote good design and amenity of the built environment,	The proposal has been reviewed by the New South Wales Government Architect (NSW GA) throughout the development of the proposed design. As discussed in <b>Section 6.1</b> , the Department considers the application would provide for good design and 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 Department has recommended a number of conditions of consent to ensure the construction and maintenance is undertaken in accordance with legislation, guidelines, policies and procedures (refer to <b>Appendix D</b> ).
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	The Department publicly exhibited the proposal ( <b>Section 5.1</b> ), which included consultation with Council and other public authorities and consideration of their responses ( <b>Sections 5.1 and 6</b> ).
(j) to provide increased opportunity for community participation in environmental planning and assessment.	The Department publicly exhibited the proposal as outlined in <b>Section 5.1</b> , which included notifying adjoining landowners and displaying the proposal on the Department's website during the exhibition period.

#### 4.4.3 Ecologically sustainable development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle.
- inter-generational equity.
- conservation of biological diversity and ecological integrity.
- improved valuation, pricing and incentive mechanisms.

The sustainability targets for the development will be achieved through minimising the need for energy consumption (via passive measures), consumption optimisation (energy efficiency) and use of renewable resources, where required.

The design has adopted passive design principles that respond to the local climate and local sun path, reducing the building's demand for active building-services systems to provide thermal comfort and artificial lighting, and reducing peak energy demand and annual energy consumption.

The development proposes ESD initiatives and sustainability measures, including:

- passive sustainable design strategies, including passive heating and cooling, daylighting, access to views.
- energy and water efficiency.
- sustainable and low-carbon material considerations.
- waste reduction design measures.
- future proofing.
- 10 per cent or more improvement on the minimum NCC2019 Section J Energy Efficiency Requirements.

The abovementioned sustainability measures will be implemented to ensure the development achieves the required rating under the Health Infrastructure Engineering Services Guidelines (incorporating Design Guidance Note 058). The Applicant has developed the Health Infrastructure ESD Evaluation Tool (ESD tool), which includes a list of nine sustainable initiative categories. The ESD tool has been previously endorsed by the Planning Secretary and outlines a self-certification approach to achieve 'Australian best practice' level, which, for NSW regional projects, is equivalent to 45 points out of 110 points available (based on the nine sustainable initiative categories). This approach has been designed to demonstrate an equivalency against the Green Building Council of Australia (GBCA) Green Star rating system. A condition of consent is recommended to certify that each of these measures has been delivered and that the targeted rating has been attained by the proposed development.

The application has also been designed to exceed minimum requirements of the deemed to satisfy requirements of Section J of the National Construction Code (NCC) for energy efficiency in building fabric and building services/systems.

The Department has considered the proposed development in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the proposed development. The proposed development is consistent with ESD principles as described in section 6.4 of the Applicant's EIS, which has been prepared in accordance with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

Overall, the proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives will encourage ESD, in accordance with the objects of the EP&A Act.

#### **4.4.4 Environmental Planning and Assessment Regulation 2000**

Subject to any other references to compliance with the EP&A Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

#### 4.4.5 Planning Secretary's Environmental Assessment Requirements

The EIS is compliant with the Planning Secretary's Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

#### 4.4.6 Section 4.15(1) matters for consideration

**Table 4** identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided in **Section 6** (Assessment) and relevant appendices or other sections of this report and EIS, referenced in the table.

**Table 4** | Section 4.15(1) matters for consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Satisfactorily complies. The Department's consideration of the relevant EPIs is provided in <b>Appendix B</b> .
(a)(ii) any proposed instrument	The Department's consideration of the relevant draft EPIs is provided in <b>Appendix B</b> .
(a)(iii) any development control plan (DCP)	Under clause 11 of the SRD SEPP, DCPs do not apply to SSD. Notwithstanding, consideration has been given to relevant DCPs at <b>Appendix B</b> .
(a)(iia) any planning agreement	Not applicable.
(a)(iv) the regulations <i>Refer Division 8 of the EP&amp;A Regulation</i>	The application satisfactorily meets the relevant requirements of the EP&A Regulation, including the procedures relating to applications (Part 6 of the EP&A Regulation), public participation procedures for SSD and Schedule 2 of the EP&A Regulation relating to EIS.
(b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	Appropriately mitigated or conditioned - refer to <b>Section 6</b> .
(c) the suitability of the site for the development	The site is suitable for the development as discussed in <b>Sections 3, 4 and 6</b> .
(d) any submissions	Consideration has been given to the submissions received during the exhibition period. See <b>Sections 5 and 6</b> .

Section 4.15(1) Evaluation	Consideration
(e) the public interest	Refer to <b>Sections 6</b> and <b>7</b> .

## 4.5 Biodiversity Conservation Act 2016

Under section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act), SSD applications are “to be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values”.

The impact of the GBH redevelopment on biodiversity values has been assessed in the BDAR accompanying the EIS and considered in **Section 6.4**.

## 5 Engagement

### 5.1 Department's engagement

In accordance with Schedule 1 of the EP&A Act, the Department publicly exhibited the application from Friday 30 April 2021 until Thursday 27 May 2021 (28 days). The application was exhibited on the Department's website.

The Department notified adjoining landholders and relevant State and local government authorities in writing. The Department representatives visited the site to provide an informed assessment of the development.

The Department received a total of six submissions from public authorities and no submissions from the general public. Copies of the submissions may be viewed at **Appendix A**.

The Department has considered the comments raised in the public authority submissions during the assessment of the application (**Section 6**) and by way of recommended conditions in the instrument of consent at **Appendix D**.

### 5.2 Public authority submissions

A summary of the issues raised in the public authority submissions is provided at **Table 5** below and copies of the submissions may be viewed at **Appendix A**.

**Table 5 | Summary of public authority submissions to the EIS exhibition**

#### Griffith City Council (Council)

Council does not object to the proposal but raised concerns with the potential traffic and pedestrian safety impacts in Warrambool Street associated with the proposed emergency and vehicle access and its proximity to school and church uses. Council recommended the consideration of a secondary emergency vehicle access linking the ambulance bay to Noorebar Street or the installation of a kerb side warning device for pedestrians/drivers on Warrambool Street.

#### Transport for New South Wales (TfNSW)

TfNSW does not object to the proposal but raised concerns with the proposed location of the access to the emergency Department and the NCS Building and potential conflict with the adjacent school zone and church uses in Warrambool Street. TfNSW recommended the implementation of a pedestrian and cycle access across Warrambool Street and an updated Green Travel Plan.

#### Environment, Energy and Science Group (EESG) of the Department

EESG does not object to the proposal, noting the impact on biodiversity is small, however, it requested further details in relation to biodiversity assessment, including: an explanation as to why the superb parrot has not generated a credit obligation given its habitat is identified as being present on the site; updated mapping of the vegetation zones; and maps showing the areas of



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vegetation requiring offsets, areas of vegetation not requiring offsets and areas not requiring assessment.

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#### Heritage NSW – Aboriginal Cultural Heritage (ACH)

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Heritage NSW ACH does not object to the proposal. It recommended conditions requiring an Interpretation Strategy and a Heritage Management Plan.

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#### Heritage NSW – Heritage Council

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Heritage NSW, as delegate of Heritage Council of NSW, does not object to the proposal, noting the site is not listed on the State Heritage Register and does not contain any known historical archaeological relics. It recommended advice be sought from Council in relation to the local heritage items on or near the site.

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#### Environment Protection Authority

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EPA does not object to the proposal.

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### 5.3 Response to submissions

Following the exhibition of the application, the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised in the submissions.

On 27 August 2021, the Applicant provided a Response to Submissions (RtS) (**Appendix A**) on the issues raised during the exhibition of the proposal. The RtS was accompanied by updated architectural plans, including dimensions and confirmation of total gross floor area. There were no changes to the design or built form.

Further clarification was provided in relation to car parking, service vehicle access and traffic generation in Warrambool Street. Details were also provided in relation to the NCS Building (under construction) and potential noise impacts, the community health centre and the current enabling works. An updated BDAR and mitigation measures was also submitted with the RtS.

The RtS was made publicly available on the Department's website and was referred to the relevant public authorities. EPA and Heritage NSW confirmed they have no objection to the proposal. The Department received additional submissions from Council, TfNSW, EESG and Heritage NSW ACH in response to the RtS.

Given that the submissions have been received outside the statutory community participation period, the Department has not placed these on the website. A summary of the issues raised in the public authority submissions is provided at **Table 6**.

**Table 6 | Summary of public authority submissions to the RtS**

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#### Council

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Council confirmed the RtS has addressed the issues raised in its original submission, noting the agreed outcomes relating to the implementation of traffic management measures in Warrambool Street following further consultation with Council.

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### **Transport for New South Wales (TfNSW)**

TfNSW confirmed that the RtS has addressed the issues raised in its original submission, noting that the Applicant had further discussions with Council in relation to the proposed location of the access to the Emergency Department and the NCS building and potential conflict with the adjacent school zone in Warrambool Street.

### **Environment, Energy and Science Group (EESG) of the Department**

EESG confirmed the RtS has addressed the issues raised in its original submission, noting the revised BDAR establishes an obligation in the Biodiversity Offset Scheme that will mitigate the anticipated impacts on threatened species. It recommends that any conditions in relation to biodiversity should be undertaken in consultation and to the satisfaction of EESG.

### **Heritage NSW – Aboriginal Cultural Heritage (ACH)**

Heritage NSW ACH acknowledged the Applicant's acceptance of the recommended conditions in relation to the provision of an Interpretation Strategy and Heritage Management Plan noting such conditions should be included in the recommended development consent.

## 6 Assessment

The Department has considered the EIS, the issues raised in submissions and the Applicant's RtS in its assessment of the proposal. The Department considers the key issues associated with the proposal are:

- built form and urban design.
- traffic and parking.
- noise and vibration impacts.

Each of these issues is discussed in the following sections of this report. Other issues were taken into consideration during the assessment of the application and are discussed at **Section 6.4**.

### 6.1 Built form and urban design

#### 6.1.1 Built form

The proposal is for a three and four storey CSB with two wings that run north-south connected by an interlinking east-west corridor. The maximum height of the proposed hospital building is 18.4m to the parapet and 22.59m to the rooftop plant at the lower ground floor of the western wing (refer to **Figures 8 to 11**).

The CSB would have a gross floor area (GFA) of 15,934sqm. When combined with the GFA of existing hospital buildings to be retained, the total GFA equates to 19,337sqm, which equates to a floor space ratio (FSR) of 0.3:1.



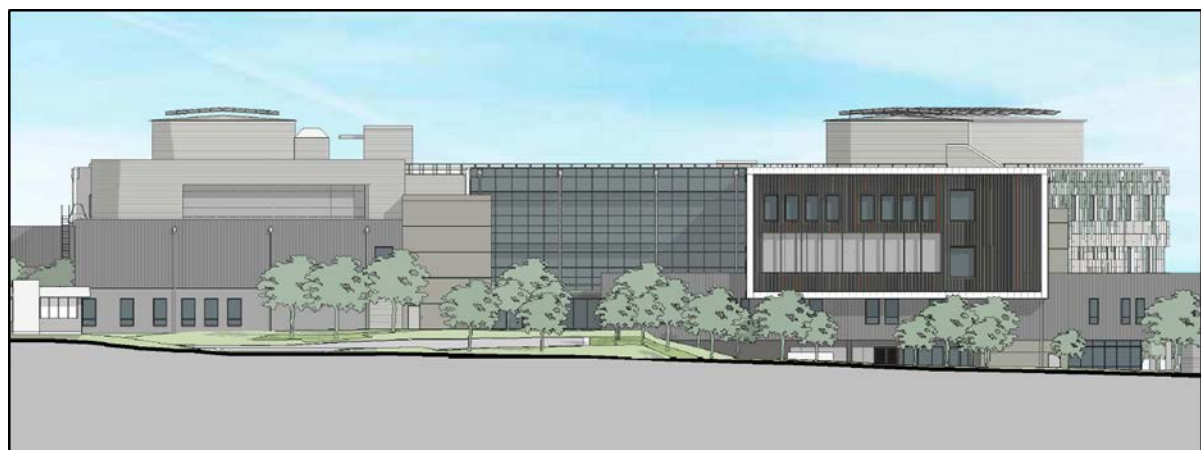
**Figure 8 | Western Elevation (Source: RtS)**



**Figure 9 | Eastern Elevation (Source: RtS)**



**Figure 10 | Southern Elevation (Source: EIS)**



**Figure 11 | Northern Elevation (Source: EIS)**

The site is not subject to a maximum building height or FSR control under GLEP 2014. There are no specific planning provisions that relate to the site under GLEP 2014.

The Department has therefore assessed the proposed development on merit and considers the appropriateness of the proposed height, bulk and scale of the development is informed by the

strategic merit of the proposal, the desired future character of the area, the potential amenity and view impacts on the surrounding area and impacts from traffic generation.

As discussed in **Section 3**, the redevelopment of the site has strategic merit as it would provide improved health care facilities to meet the needs of the Griffith and surrounding communities, as well as deliver job opportunities and investment into the town centre.

Although the scale of the development would be significantly larger than existing low density residential development surrounding the site, the hospital precinct controls in the Griffith Residential Development Control Plan (GRDCP) 2020 foreshadow an uplift in density with an FSR of 1:1 to encourage a diverse range of housing options for hospital and medical staff on land in the immediate vicinity of the site. The Department considers that the scale of the development would therefore sit comfortably within the desired future character of the area.

Additionally, the proposal would not result in any loss of views or overshadowing or privacy impacts to existing medical and hospital developments adjoining the site and the wider public domain due to the extensive building setbacks to the site boundaries.

The Applicant's Visual Impact Assessment (VIA) submitted with the EIS provides a visual comparison of the existing and proposed views from five key view corridors in the immediate vicinity of the site (refer to **Appendix C**).

When viewed from the public domain surrounding the site, the CSB would be viewed within the context of the wider hospital site. The Department considers the visual impact of the development would be minimised by the intervening hospital and medical buildings to the east and west and the extensive setback of 155m to the south at Noorebar Avenue. When viewed from the public domain to the north, the hospital building would be visually prominent due to a relatively shorter setback of 40m to the northern site boundary at Animoo Avenue. However, the Department considers the high degree of building articulation and modulation would break up the overall bulk and scale of the building to an acceptable level. It is also noted that northern setback includes landscape and canopy trees to assist in softening the built form when viewed from the Animoo Avenue.

The new CSB would be the tallest and most prominent building on the hospital campus and in the locality. However, the Department recognises the built form is consistent with functional hospital building design that maximises efficiency through vertical alignment of functions and services.

The Department considers that the built form of the development, including its location on the site and orientation, is acceptable within the context of the wider hospital site and better responds to the objective to establish essential connections to the existing private hospital in the north-eastern part of the site. Developing vertically supports greater landscape outcomes at the ground level, including a parkland setting at the main public point of arrival in the southern part of the site.

The site is considered capable of accommodating the development without unacceptable traffic impacts on the surrounding road network (refer to **Section 6.2**).

Finally, the Department considers the proposal results in a building height and scale that contributes to the identity and future character of the precinct and does not result in adverse environmental outcomes to the locality. The parkland setting and landscape solutions of the proposed development will reduce the impact of the scale of the building when viewed from surrounding streets.

The proposal has been reviewed by the New South Wales Government Architect (NSW GA) throughout the development of the proposed design, and no concerns were raised in relation to the height and scale of the development. Council did not raise any concerns with the built form of the CSB.

Accordingly, the Department concludes the built form of the development to be appropriate for the site.

### 6.1.2 Building Design and Articulation

The principles of biophilic design have been adopted as a means of connecting the building users to the surrounding environment to promote health and wellness. With this design approach in mind, the CSB is articulated into two separate built forms through the insertion of a series of courtyards and outdoor spaces separating both wings of the building. The design provides more external windows and better access to natural light and a visual connection to the landscape (refer to **Figure 12**). The materiality incorporates a solid concrete base and a combination of glazing and aluminium panels and vertical blades/screens at the upper levels (refer to **Figure 13**).

The Department considers the spatial arrangement and building layout provides good natural light and amenity, visual connection to the landscape and ease of circulation and privacy for future hospital users. The Department also considers the varied materials and finishes achieve a patterned and textural finish that creates a visually interesting building. Furthermore, the mechanical plant at the rooftop is appropriately screened, integrated into the overall design and setback from the building edges to minimise its visual bulk. The Department notes the detailed design is supported by the NSW GA.

Accordingly, the Department concludes the building design and articulation to be appropriate for the site.



**Figure 12 | Ground Floor Design Layout (Source: EIS)**





**Figure 13 | Proposed Façade Materiality (Source: EIS)**

### 6.1.3 Landscape Design and Open Space

The spacious nature of the site and the relatively small footprint of the CSB affords the opportunity to enhance the sites engagement with the local community. The main feature of the landscape design is the single point of public arrival to a central forecourt and aboriginal courtyard at the main entry to the hospital. The landscape design also incorporates a series of smaller courtyards with planting and a variety of natural elements such as rocks and water features, lawn, seating, terraced areas and textured pathways (refer to **Figure 14**).

The Department considers the landscape design and open space is appropriate for the site, in that:

- it maintains a parkland setting in the southern part of the site.
- it utilises the natural environment to connect two courtyards separated by the transparent entry reception and link bridge.
- the system of circulation connects to the local pedestrian network improving site permeability.
- adequate landscape is provided to soften the hardstand carparks and reduce the heat island effect.
- play equipment, gardens and open lawn areas encourage activation of the spaces, including quiet contemplation and social interaction.

Furthermore, the landscape design and connection to the landscape will promote the health and wellbeing of patients, visitors and staff. Accordingly, the Department concludes the landscape design and open space would result in a positive impact on the public domain areas surrounding the hospital.



**Figure 14 | Landscape design and open space (Source: EIS)**

## 6.2 Traffic, Parking and Access

### 6.2.1 Traffic

#### Construction

The Transport and Parking Report (TPR) submitted with the EIS includes a preliminary Construction Traffic Management Plan (CTMP).

The estimated number of heavy vehicle trips per day is 16, based on a peak construction workforce of 200 to 250 people. These trips would generally be spread evenly throughout the day and therefore are likely to have a negligible impact on the surrounding road network (two trips per hour).

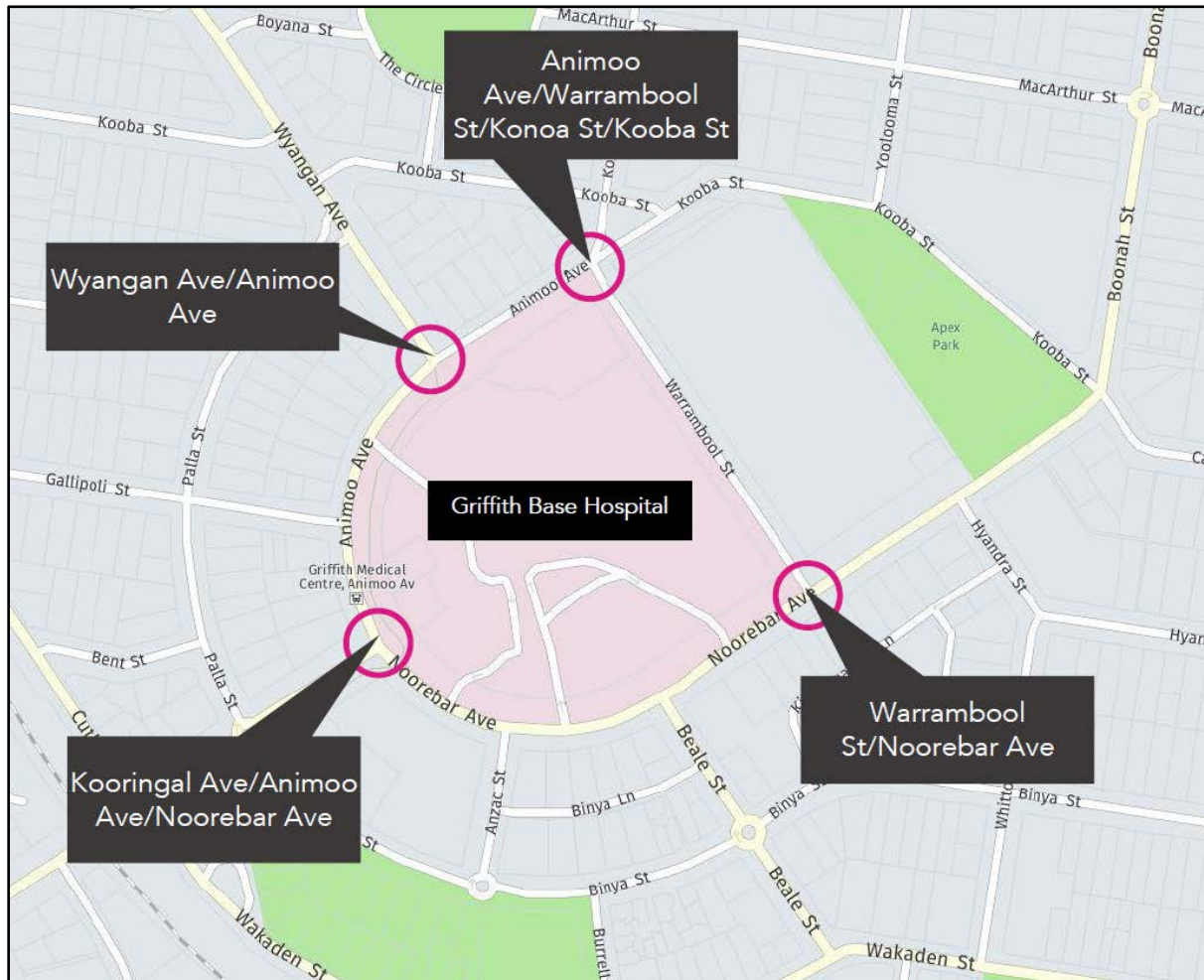
The estimated number of light vehicle trips per day is between 236 to 256. As these trips generally do not coincide with peak commuter traffic (i.e. before 7am and after 6pm on weekdays), the traffic impacts on the surrounding road network are expected to be negligible.

The Department has recommended conditions of consent requiring the Applicant to prepare and implement a Construction Traffic and Pedestrian Management Plan (CTPMP). Subject to preparation and implementation of the CTPMP, the Department is satisfied that construction traffic impacts would be appropriately managed.



## Operational

The TPR provides an assessment of the impact of the additional traffic generated by the proposed redevelopment on the key intersections surrounding the hospital site. The location of these intersections is shown in **Figure 15**.



**Figure 15 | Key intersections (Source: EIS)**

The TPR identified up to 39 additional vehicle trips (inbound and outbound) would be generated in the AM peak period and an additional 38 vehicle trips in the PM peak period compared to the number of trips generated by the existing hospital. The additional vehicle trips include service and emergency vehicles.

The traffic modelling demonstrates that the intersections surrounding the site would continue to operate at good levels of service (LOS A) despite the increase in traffic movements associated with the proposed development - refer to the existing and proposed Level of Service (LOS) in **Table 7**.

Council raised no issue with the traffic assessment or the impact on the operation of key intersections surrounding the hospital. However, concern was raised with emergency vehicle and service vehicle access in Warrambool Street. This aspect is addressed in **Section 6.2.3**.

The Department concludes that the additional traffic generated would not have a significant impact on the surrounding road network and all intersections would continue to operate satisfactorily.

**Table 7 | Existing and proposed LOS (weekdays) – key intersections**

Intersection	Peak	Pre-development LOS	Post-development LOS
Koorringal Avenue/Animoo Avenue/Noorebar Avenue	AM	A	A
	PM	A	A
Animoo Avenue/Wyangan Avenue	AM	A	A
	PM	A	A
Animoo Avenue/Konoa Street/Kooba Street/Warrambool Street	AM	A	A
	PM	A	A
Warrambool Street/Noorebar Avenue	AM	A	A
	PM	A	A

### 6.2.2 Parking

The TPR includes a parking demand survey which concludes the hospital is currently generating a total demand of 296 car spaces. The survey data indicated 247 vehicles were observed on the site, suggesting 49 vehicles are currently parking on the street. The on-street parking spaces in the vicinity of the hospital are generally underutilised, except for Warrambool Street during peak school times, which has unrestricted parking close to current hospital services, and around the existing childcare centre in Noorebar Avenue.

The proposed increase in the number of staff and the additional inpatient beds and outpatient treatment spaces associated with the redevelopment of the hospital is expected to increase the parking demand on the site.

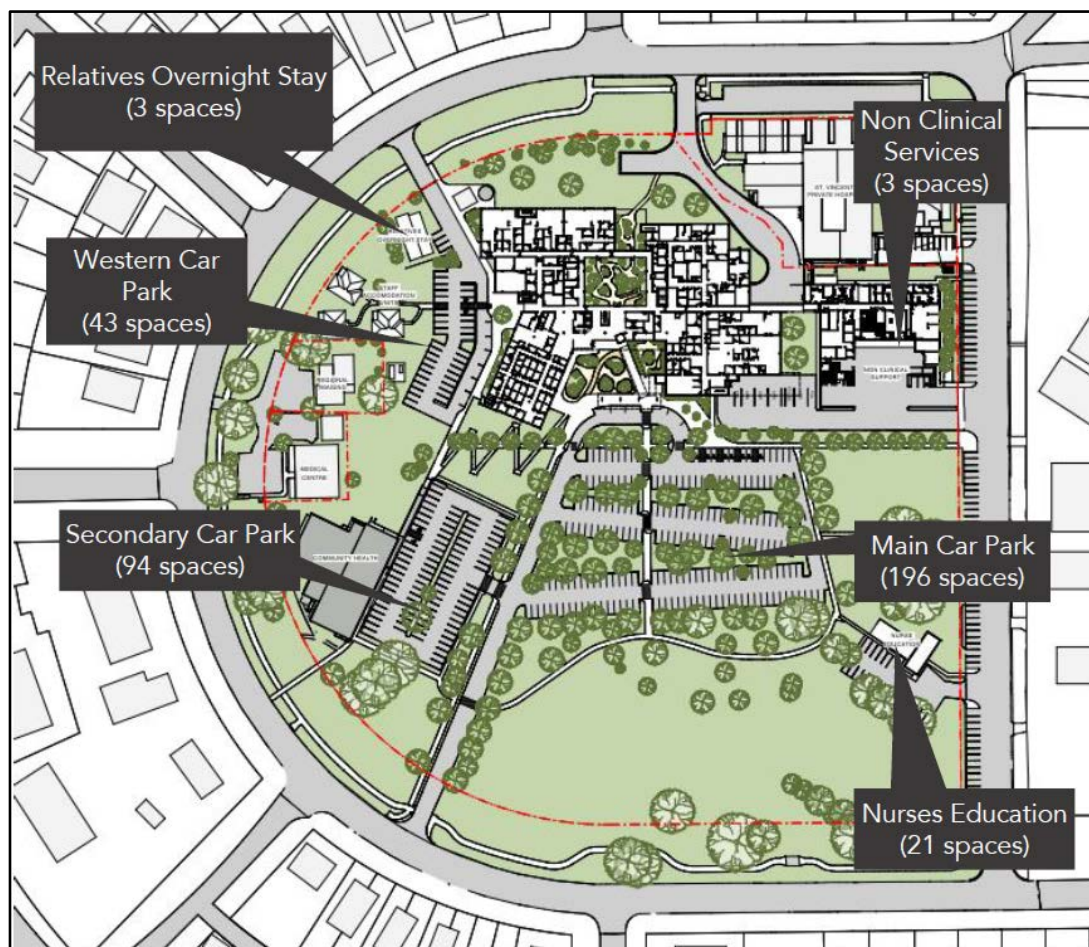
The *RMS Guide to Traffic Generating Development* does not provide a rate for car parking for public hospitals. The TPR therefore adopts its own modelling process to estimate the parking demand generated by the hospital based on the number of staff, outpatients and emergency department presentations.

The TPR estimates the proposal will generate a peak parking demand of 406 car spaces, which equates to a total campus parking demand of 357 spaces (acknowledging the number of vehicles typically parking on the street).

The provision of 357 car spaces on the site and two drop-off bays, four ambulance bays, one patient transport bay and two police bays would satisfy the forecast parking demand on the site (refer to **Figure 16**).

The Department is satisfied with the approach taken by the Applicant to assess parking demand and notes no concerns were raised by Council or TfNSW with respect to parking provision.

The Department's assessment concludes there will be an adequate supply of parking spaces available to ensure the efficient and orderly movement of vehicles through the hospital campus and minimise parking in the surrounding streets.



**Figure 16 | Proposed carparks (Source: EIS)**

### 6.2.3 Vehicular Access

Currently, the public and emergency vehicle access to the hospital is from Noorebar Avenue in the south and service access is from Animoo Avenue in the north. With the proposed redevelopment, the key change to the access arrangements involves the functional separation of public and emergency vehicle access. To that end, the existing main vehicle entry/exit driveways off Noorebar Avenue to the south will be consolidated into a single two-way entry/exit providing access into the new public carpark and the main entrance to the hospital. All service and emergency vehicles will access the hospital via Warrambool Street.

As the public and staff will no longer use Warrambool Street to access the outpatient and maternity carparks, there will be a decrease in traffic along Warrambool Street post-redevelopment. However, the type of the traffic on Warrambool Street will change due to the service and emergency vehicle traffic generated by the NCS carpark, loading dock and ambulance bay.

### *Emergency Vehicles*

Council and TfNSW raised concerns with potential traffic and pedestrian safety impacts in Warrambool Street associated with the proposed emergency vehicle access and increased vehicle activity around the school and church during school peak times (drop-off/pick-up) and funerals.

The Applicant's RtS responded to these traffic and pedestrian safety concerns by noting that:

- most of the ambulance movements (average 12 per day) are non-urgent/non-critical and therefore do not require the ambulance to move at a high speed.
- the use of a siren is an accepted mitigation measure for warning vehicles and pedestrians of an emergency vehicle approaching.
- the peak school traffic flow along Warrambool St has a high level of predictability and NSW Ambulance (NSWA) drivers are suitably trained to ensure risks are mitigated in the event of an ambulance travelling at speed.
- the carriageway in Warrambool Street is 19.5m in width, and even with on-street parking either side of the street, a 10m travel lane is maintained for ambulance passing.
- the emergency vehicle entry is for exclusive use by NSWA, preventing public vehicles mixing and impeding emergency vehicles.
- nearby intersections will continue to operate at good level of service and are not expected to result in any delay for ambulance vehicles.
- the emergency vehicle entry off Warrambool Street is the shortest distance to the emergency department and triage.

The Department notes that whilst there is a small increase in activity of people crossing the Warrambool Street during peak school hours, most of the pedestrian activity occurs on the eastern side at the school pick-up and drop-off zone during the peak weekday times.

The Department also notes the Applicant undertook further consultation with Council as part of the RtS and pedestrian treatment measures were agreed upon to address the potential traffic and pedestrian safety concerns in Warrambool Street, including:

- installation of warning signs on both sides of Warrambool Street to raise awareness and warn the public to be cautious as emergency vehicles are in operation in the area.
- installation of a painted chevron and wording (no stopping, keep clear) on the western half of Warrambool Street in front of the emergency vehicle entry to the new hospital.
- consultation with St Patrick's Primary School in running an education campaign for students, staff and parents to raise awareness before the emergency vehicle entry is commissioned for use by NSWA.

The Department is satisfied the potential traffic and pedestrian safety concerns can be adequately managed and mitigated, subject to the implementation of the pedestrian treatment measures outlined above. The Department has recommended conditions to this effect, including consultation with the St Patrick's Primary School, prior to commencement of operations.

### *Service and Delivery Vehicles*

The loading dock associated with the NCS building will provide one heavy rigid vehicle (HRV) bay and one medium rigid vehicle (MRV) bay. A bay will also be provided in front of the compactor to allow waste vehicles to reverse into the space and exit in a forward movement. It is noted that vehicles will not be able to enter or exit the HRV and MRV bays whilst a waste vehicle is parked in front of the compactor. The Applicant's TPR recommends the implementation of a Loading Dock Management Plan to ensure that there is no conflict during waste collection. A condition to this effect is included in the recommended development consent.

The Department also considers that servicing and delivery vehicles should operate outside the peak school times to assist in minimising any conflicts with heavy vehicles accessing the site. A condition to this effect is also included in the recommended development consent.

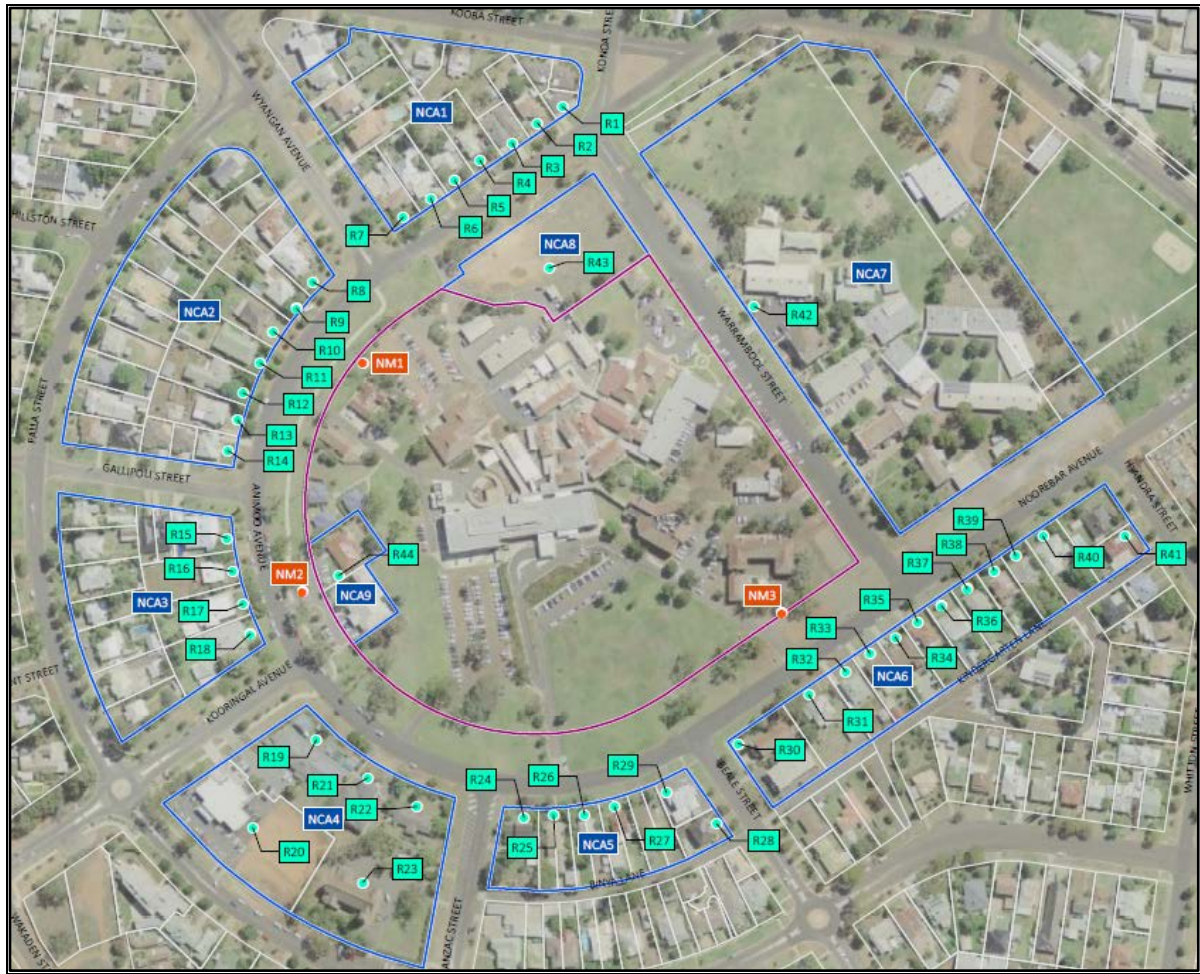
Whilst the majority of service vehicle access will be relocated to Warrambool Street, the existing access via Animoo Avenue will continue to be used for deliveries to SVPCH and for access to the oxygen tank. The oxygen tank is refilled from the rear of a semi-trailer, which requires a reversing manoeuvre into the adjacent bay. This allows the semi-trailer to drive forward into the site, undertake a 3-point turning manoeuvre and drive forward out of the site. It is noted that while the semi-trailer is driving in and out of the site, the vehicle will need to use both sides of the road.

The Applicant's RtS considered this arrangement is acceptable based on low frequency of this delivery (currently less than once a month). The oxygen tank bay will also serve as a turning area for other large trucks making deliveries to SVPCH, if required. For smaller trucks making deliveries to SVPCH, the vehicle can make a 3-point turn manoeuvre at the end of the road near the NCS building. The Department recommends an Operational Management Plan to manage the access for large vehicles to and from the site in Animoo Avenue. A condition to this effect is included in the recommended development consent.

## **6.3 Noise and Vibration**

A Noise and Vibration Impact Assessment (NVIA) was submitted with the EIS that assessed the potential construction noise and vibration impacts and operational noise on nearby sensitive land receivers (residential, healthcare, place of worship and educational). The NVIA separates the surrounding areas into nine noise catchments and noise monitoring was undertaken at three locations along the site boundary to quantify the existing acoustic environment at the site (refer to **Figure 17**).





**Figure 17 | Noise sensitive receivers surrounding the site (Source: EIS)**

### Construction Noise

The Interim Construction Noise Guideline (ICNG) recommended construction hours are Monday to Friday 7am to 6pm, Saturday 8am to 1pm and no construction work on Sundays or public holidays. The NVIA indicates that construction work is not currently proposed to be undertaken outside the standard construction hours.

The NVIA establishes the project specific noise management levels (NMLs) for the residential and non-residential receivers, having regard to the ICNG and the background noise level at the receiving catchments (refer to **Table 8**).

### Table 8 | Construction Noise Management Levels

Sensitive receiver	NMLs (dB(A) Leq (15min))
<i>Residential catchments</i>	
NCA1 & NCA2	51
NCA3 & NCA4	52

Sensitive receiver	NMLs (dB(A) Leq (15min))
NCA5 & NCA6	50
<i>Non-residential</i>	
Schools/education	45 (internal) 65 (external)
Hospital Ward & Theatre	45 (internal) 65 (external)
Place of worship	45 (internal) 55 (external)

The construction noise levels associated with site preparation and general construction activities will generally comply with the NMLs at the residential and non-residential locations. However, the predicted noise levels associated with use of an excavator during demolition and rock hammering and sawing activities during excavation of the lower ground floor would exceed the NMLs up to 66dB(A) at the nearest residential receiver (NCA2 to the north) and 75dB(A) at the nearest non-residential receiver (SVPCH).

To mitigate and manage the adverse noise impacts the NVIA recommends: acoustic noise barriers; scheduling of works and respite periods; community consultation; noise compliance monitoring; complaints handling procedures; regular maintenance of equipment and use of quieter equipment.

The Department considers the NVIA provides a satisfactory assessment of the likely construction noise impacts of the proposal, including impacts to nearby residences and adjacent healthcare facilities. Neither the EPA nor Council raised concerns with construction noise impacts of the proposal. The Department acknowledges that demolition and excavation works would result in adverse acoustic impacts to nearby residents but is satisfied that the proposed construction noise management and mitigation measures are appropriate and would assist with reducing noise impacts.

Construction site vibration can have a tangible negative impact on surrounding buildings. The NVIA indicates the safe working distances recommended by the Construction Noise Vibration Guideline (CNVG) for typical items of vibration intensive plant. Vibration generated by heavy construction works are expected to comply with cosmetic damage limits, noting that vibratory rollers utilised for the new carpark are unlikely to exceed vibration limits for receivers external to the site, and all other equipment will generally satisfy the minimum offset distances, except for the large hydraulic hammer and vibratory pile driver.

The NVIA recommends human response vibration limits should be considered with the preparation of the detailed Construction Noise and Vibration Management Plan (CNVMP). Consideration should be given to existing patient wards and consultation rooms, particularly where vibration sensitive equipment such as microscopes and the like are utilised.

The Department recommends conditions requiring the Applicant to manage construction noise including the use of respite periods, and to prepare and implement a detailed CNVMP which is to:

- be prepared in consultation with the community.
- identify appropriate measures to mitigate the noise impacts.
- monitor noise and vibration impacts.
- establish a complaints management system.

The Department considers that, subject to the preparation and implementation of a CNVMP that incorporates appropriate mitigation measures and is prepared in consultation with the closest sensitive receivers, daytime construction noise and vibration impacts can be satisfactorily managed and mitigated as far as possible.

### Operational Noise

The NVIA identified potential operational noise sources as: road traffic noise generation; vehicle movements within the new carparks; and mechanical plant operation. The NVIA identified the Project Noise Trigger Levels (PNTLs) in accordance with the relevant provisions of the Noise Policy for Industry (NPI). Refer to **Table 9**.

**Table 9 | Project Noise Trigger Level**

<b>Sensitive receiver</b>	<b>PNTL (dB(A) Leq (15min))</b>
<b><i>Residential catchments</i></b>	
<b>NCA01 &amp; NCA02</b>	
Day	46
Evening	44
Night	41
<b>NCA03 &amp; NCA04</b>	
Day	47
Evening	42
Night	37
<b>NCA05 &amp; NCA06</b>	
Day	45
Evening	43
Night	38
<b><i>Non-residential</i></b>	
School classroom	38 (internal) 48 (external)
Hospital Ward	38 (internal) 43 (external)
Place of worship	43 (internal) 53 (external)
Commercial	68



The NVIA found that additional traffic movements associated with the hospital would increase overall traffic noise within the area by 1.5 dB(A), which is insignificant having regard to the NSW Road Noise Policy (RNP). Noise from peak hour carpark movements on the site would also comply with the relevant noise criteria and not result in unacceptable adverse impacts to surrounding residential properties. The noise associated with service and delivery vehicles accessing the loading dock within the NCS is not expected to generate any significant noise impacts to the St Patricks Primary School due to a distance separation of 35m to the nearest school building and the enclosed nature of the loading docks within the NCS building.

Carpark movements during the night-time period are expected to be sporadic in the absence of visiting hours and specialist consultations. The NVIA found that the noise from cars starting and doors shutting during the night-time period is expected to comply with the sleep awakening criteria in accordance with the NPI.

The NVIA states that the mechanical plant and equipment noise emissions can be controlled to acceptable levels at the nearest noise sensitive receivers with acoustic attenuation treatment. The NVIA recommends detailed noise predictions be conducted during the detailed design phase to ensure that the mechanical plant and equipment noise emissions satisfy the noise emission criteria.

The Department considers that the NVIA demonstrates the hospital could operate without unreasonable noise impacts to surrounding residential areas and other sensitive receivers, subject to plant and equipment being selected and designed with acoustic attenuation measures to ensure compliance with the established noise criteria to ensure acceptable outcomes for nearby sensitive receivers.

The EPA and Council raised no concerns regarding the operational noise impacts of the proposal.

To ensure noise is appropriately managed in accordance with the NVIA, the Department recommends that:

- a detailed review of mechanical plant should be undertaken as part of the detailed design and construction phases to ensure that cumulative noise emissions comply with the PNTLs provided.
- short term noise monitoring be undertaken following commencement of operation to demonstrate compliance with noise criterion.

The Department is satisfied the noise impacts generated by the development can be adequately managed and mitigated, subject to the verification of noise attenuation measures during the detailed design stage and verification of operating conditions upon commencement of operations. The Department has recommended conditions requiring the proposal demonstrates it can comply with the EPA's recommended noise limits and that post occupation monitoring is undertaken.

## 6.4 Other issues

The Department's consideration of other issues is provided at **Table 10**.

**Table 10** | Department's assessment of other issues

Issue	Findings	Department's consideration and recommended conditions
Aboriginal Heritage	<ul style="list-style-type: none"> <li>An Aboriginal Cultural Heritage Assessment Report (ACHAR) was submitted as part of the EIS.</li> <li>Consultation with representatives of the Aboriginal community indicates that the site is important to the local and broader Aboriginal community.</li> <li>An archaeological survey of the site was undertaken in association with the Griffith Local Aboriginal Land Council (LALC).</li> <li>Aboriginal objects were found in the southern portion of the hospital site.</li> <li>The ACHAR recommends ongoing consultation with Griffith LALC, an Interpretation Strategy and an unexpected finds protocol.</li> <li>Heritage NSW supports the implementation of an Interpretation Strategy and a Heritage Management Plan to manage unexpected finds of aboriginal artefacts during the construction phase.</li> </ul>	<p>The Department is satisfied that subject to conditions, the potential impacts to Aboriginal cultural heritage will be minimised and appropriately managed.</p> <p>The Department has recommended the following conditions:</p> <ul style="list-style-type: none"> <li>preparation of an Interpretation Strategy for the archaeology and Aboriginal history of the site.</li> <li>preparation of a Heritage Management Plan incorporating an unexpected finds protocol.</li> </ul>
Contamination and Remediation	<ul style="list-style-type: none"> <li>An Environmental Site Assessment (ESA) was submitted as part of the EIS.</li> <li>The detailed site investigation did not find any elevated concentrations of the contaminants of potential concern above the adopted site assessment criteria (SAC) in the soil samples analysed.</li> <li>However, it did find decommissioned underground storage tanks (USTs) and asbestos contaminated material (ACM) on the site.</li> <li>The Applicant submitted a Remediation Action Plan (RAP), which</li> </ul>	<p>The Department is satisfied that subject to the imposition of conditions, including appropriate removal of asbestos and remediation and validation where necessary, the site can be made suitable for the proposed use and will not result in unacceptable contamination risks.</p> <p>The Department has recommended the following conditions:</p>

Issue	Findings	Department's consideration and recommended conditions
	<p>includes excavation and off-site disposal of ACMs and USTs (and nearby impacted soils) and associated infrastructure.</p> <ul style="list-style-type: none"> <li>The ESA concludes the site can be made suitable for the proposed development, subject to remediation and a validation assessment to demonstrate that the site (or each development stage) is suitable for its intended use.</li> </ul>	<ul style="list-style-type: none"> <li>an unexpected finds protocol to manage potential contamination, should it be uncovered.</li> <li>appropriate removal of asbestos in accordance with the requirements of SafeWork NSW</li> <li>a Validation Report and Site Audit Statement demonstrating the site is suitable for the proposed use.</li> </ul>
Stormwater Drainage and Flooding	<ul style="list-style-type: none"> <li>The EIS includes a Civil Design Report, which provides an assessment of drainage and stormwater for the site.</li> <li>The overall impervious areas within the site (roofs, carparks, paved areas) will be reduced by approximately 15 per cent, resulting in the reduction of stormwater flows.</li> <li>The site stormwater drainage strategy incorporates Water Sensitive Urban Design principles by including grassed swales, bio-retention swales and basins, infiltration trenches and areas.</li> <li>Estimated peak stormwater flows from the site will be less than the predevelopment flows.</li> <li>The contractor commissioned for construction works will be required to prepare a temporary stormwater diversion plan, for each stage of construction works.</li> <li>Based on the assessment of the proposed staging of construction works, there will be no increase in stormwater flows from the site.</li> <li>The site is located on the high side of the stormwater catchment and there are no uphill areas that drain to the site.</li> </ul>	<p>The Department is satisfied the development would result in stormwater quantity and quality that is equal to or better than existing conditions.</p> <p>The Department has recommended the following conditions:</p> <ul style="list-style-type: none"> <li>implementation of a stormwater management system designed in accordance with Council's Engineering Guidelines – Subdivision and Development Standards, Council's On-site Detention Policy and Council's Stormwater Drainage and Disposal Policy.</li> <li>preparation of a Stormwater Operation and Maintenance Plan.</li> </ul>

Issue	Findings	Department's consideration and recommended conditions
	<ul style="list-style-type: none"> <li>• The site is not shown to be flood affected in Council's flood mapping, however areas downstream of the site (to the south) are flood affected.</li> <li>• The proposed stormwater drainage system has been designed to accommodate and convey stormwater flows from buildings, carparks, internal roads and driveways, landscaped areas and to eliminate a risk of localised flooding.</li> </ul>	
Tree Impacts	<ul style="list-style-type: none"> <li>• The EIS includes an Arboricultural Impact Assessment (AIA), which evaluates the impact to the existing trees on the site due to the development.</li> <li>• To accommodate the proposal, the removal of 86 trees will be required. Sixty of these trees have already been approved for removal under a previous planning approval.</li> <li>• Of the 26 trees to be removed under this application, one tree is of high retention value with the remainder having medium to low retention value.</li> <li>• The AIA recommends a replacement ratio of 1:1 to compensate for the loss of these trees and ensure the landscape setting is maintained.</li> <li>• This is in addition to the biodiversity offset strategy to compensate for the unavoidable removal of biodiversity values (see discussion below).</li> <li>• The AIA recommends protection measures for trees to be retained and a suitably qualified and experienced arborist to undertake tree removal work and supervise the installation and monitor tree protection measures during construction works.</li> </ul>	<p>The Department notes the proposal has a comprehensive landscaping strategy that will include the creation of additional new landscaped areas on the site. Despite the removal of existing trees under this application, the Department is satisfied the landscape regime and compensatory planting would maintain the landscape amenity of the site.</p> <p>The Department has recommended the following conditions:</p> <ul style="list-style-type: none"> <li>• tree protection and management measures and tree protection fencing.</li> <li>• tree pruning and vegetation management.</li> <li>• engagement of a suitably qualified and experienced Arborist to supervise all tree removal and installation of tree protection measures.</li> </ul>

Issue	Findings	Department's consideration and recommended conditions
		<ul style="list-style-type: none"> <li>compensatory tree planting.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>The proposal involves the removal of existing vegetation and the EIS includes a Biodiversity Development Assessment Report (BDAR) in accordance with the requirements of the <i>Biodiversity Conservation Act, 1999</i>.</li> <li>The BDAR was updated with the RtS to address matters raised by EESG.</li> <li>The report identified some fragmented pockets of remnant vegetation in a highly disturbed context.</li> <li>The remnant vegetation does not meet the eligibility criteria for listing of ecological communities as threatened according to the <i>Environment Protection and Biodiversity Conservation Act, 1999</i>.</li> <li>Three hollow bearing trees were identified for retention and recommended tree protection works during the construction phase.</li> <li>The proposal will require the removal of approximately 0.1 ha of Plant Community Type – PCT ID 82 Western Grey Box – Poplar Box – White Cypress Pine tall woodland, which has an associated EEC.</li> <li>The clearing of 0.1 ha does not exceed the threshold for serious or irreversible impact but does require one ecosystem credit.</li> <li>One offset Species Credit Species is required for the Superb Parrot (removal of breeding habitat). None of the threatened species possible in the proposal area for this project are listed threatened entities requiring assessment of serious and irreversible impacts.</li> </ul>	<p>The Department is satisfied the development would have minimal impact on biodiversity.</p> <p>The Department has recommended the following conditions:</p> <ul style="list-style-type: none"> <li>tree protection measures for the hollow bearing trees.</li> <li>the retirement of ecosystem credits and species credits (like-for-like) as set out in the BAM Biodiversity Credit Report contained in Appendix 5 of the BDAR.</li> </ul>

Issue	Findings	Department's consideration and recommended conditions
	<ul style="list-style-type: none"> <li>EESG advises that the BDAR has been prepared according to the Biodiversity Assessment Method and establishes an obligation in the Biodiversity Offset Scheme that will mitigate the anticipated impacts on threatened species.</li> </ul>	
Hazardous Materials	<ul style="list-style-type: none"> <li>The EIS includes a Hazardous Materials Assessment, which found hazardous materials contained within the existing buildings on the site, including asbestos containing materials, lead paint, synthetic mineral fibres, PCB chemicals and refrigerants.</li> <li>Some areas of the hospital were unable to be accessed during the survey and further assessment is recommended, prior to demolition works to confirm the presence or otherwise of any hazardous materials.</li> </ul>	<p>The Department is satisfied that subject to the imposition of conditions any hazardous material can be appropriately managed and disposed of prior to commencement of construction works.</p> <p>The Department has recommended the following conditions:</p> <ul style="list-style-type: none"> <li>additional investigations be made by the asbestos removalist in areas not accessible at the time of the assessment.</li> <li>Asbestos Containing Material to be removed in accordance with relevant codes of practices, compliance codes and legislation.</li> </ul>
Construction and Operational Waste Management	<ul style="list-style-type: none"> <li>The EIS includes a Construction Waste Management Plan (CWMP), which identifies waste minimisation and management measures for demolition and construction waste, including recycling, separating, monitoring and recording the volumes of waste, and the methods and location of disposal.</li> <li>The EIS also includes an Operational Waste Management Plan (OWMP), which details the continued waste</li> </ul>	<p>The Department is satisfied that appropriate waste management facilities have been provided on the site and the construction and operational waste would be appropriately managed.</p> <p>The Department has recommended the following conditions:</p>

Issue	Findings	Department's consideration and recommended conditions
	management operations to be implemented for the proposed development.	<ul style="list-style-type: none"> <li>• preparation of a final Construction Waste Management Sub-Plan.</li> <li>• preparation of a final Operational Waste Management Plan.</li> </ul>
Signage and Wayfinding	<ul style="list-style-type: none"> <li>• The EIS includes a signage and wayfinding strategy with key identification signs located at the entry/exit points along the street frontage and the building façade.</li> <li>• The EIS includes an assessment against State Environmental Planning Policy 64 (SEPP 64).</li> </ul>	<p>The Department considers the proposed signage satisfactorily addresses each of the relevant provisions of SEPP 64 and is considered appropriate for the site and the locality.</p> <p>No additional conditions are required.</p>
SEPP 33 Hazardous and Offensive Development	<ul style="list-style-type: none"> <li>• The EIS includes a preliminary SEPP 33 Assessment which concludes that materials being stored did not exceed the thresholds and that a Preliminary Hazard Analysis (PHA) was not required, noting the tank used for storage of liquid oxygen has existing approval and would not be changing as part of the proposed development.</li> <li>• The DPE Hazards team reviewed the submitted documents and determined that the proposal is not potentially hazardous under SEPP 33 and a preliminary hazard analysis is not required to be submitted.</li> <li>• The DPE Hazard team also recommended a standard condition in relation to the storage of Dangerous Goods.</li> </ul>	<p>The Department is satisfied that the proposal has been properly assessed against the requirements in SEPP 33.</p> <p>The Department has recommended the following condition:</p> <ul style="list-style-type: none"> <li>• Dangerous Goods, stored and handled in accordance with relevant Australian Standards.</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>• The EIS includes an Access Report, having regard to the relevant disability standards.</li> <li>• The report demonstrates that subject to design details being resolved, the</li> </ul>	<p>Subject to the implementation of the recommended conditions, the Department is satisfied the proposal would provide</p>



Issue	Findings	Department's consideration and recommended conditions
	project can meet all relevant requirements in relation to disabled access.	<p>equitable access for all users of the site.</p> <p>The Department has recommended a condition that requires all works to provide access and facilities for people with a disability in accordance with the Building Code of Australia (BCA).</p>
Sediment and Erosion Control	<ul style="list-style-type: none"> <li>The Applicant has submitted an Erosion and Sediment Control Management Plan with the EIS.</li> <li>The plan proposes measures which include the collection and treatment of sediment affected runoff before discharge from the site. Measures are also proposed to control dust, such as watering down of roads and stockpiles, covering of haulage trucks and stockpiles, and monitoring of weather conditions on site.</li> </ul>	<p>The Department is satisfied that subject to the recommended conditions the proposed development would be appropriately managed in terms of erosion and sediment control.</p> <p>The Department has recommended the following conditions:</p> <ul style="list-style-type: none"> <li>implementation of an Erosion and Sediment Control Management Plan</li> <li>implementation of a detailed Construction Management Plan.</li> </ul>
Utilities	<ul style="list-style-type: none"> <li>The EIS included a Utility Services Report, which demonstrates that suitable capacity and supply of electricity, telecommunications, sewer, stormwater, water and gas would be provided for the proposed development.</li> </ul>	<p>The Department is satisfied that the proposal would provide adequate utility infrastructure and would not result in any adverse impacts.</p> <p>No additional conditions are required.</p>
Crime Prevention Through Environmental	<ul style="list-style-type: none"> <li>CPTED principles for minimising risk have been considered and incorporated throughout the design of</li> </ul>	<p>The Department considers the proposed design improves casual surveillance</p>

Issue	Findings	Department's consideration and recommended conditions
Design (CPTED)	the proposed redevelopment of the hospital, including the hospital grounds and outdoor/publicly accessible areas, as well as the hospital building.	<p>of the hospital grounds and provides direct, obvious and secure access to the hospital.</p> <p>No additional conditions are required.</p>
Green Travel Plan	<ul style="list-style-type: none"> <li>TfNSW recommends the GTP submitted with the EIS is updated to include additional actions to encourage the use of sustainable transport to the site.</li> </ul>	The Department has recommended a condition requiring the GTP to be updated in consultation with TfNSW.
Development Contributions	<ul style="list-style-type: none"> <li>The Applicant seeks an exemption from the payment of development contributions based on the fact that the proposed development relates to social infrastructure provided by a public authority and it should not be subject to the levying of contributions.</li> </ul>	Based on the significant public benefit provided by the hospital, the Department accepts development contributions should not be levied against the development.

## 7 Evaluation

The Department has reviewed the EIS, RtS and assessed the merits of the proposal, taking into consideration comments from the public authorities, and all environmental issues associated with the proposal have been addressed. The Department concludes the impacts of the proposed development are acceptable and can be appropriately mitigated through implementing the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved subject to conditions.

The proposed development is consistent with the objects of the Environmental Planning and Assessment Act 1979 (including ecologically sustainable development) and with the State's strategic planning objectives for the site as set out in the Riverina Murray Regional Plan 2036 and Griffith Council's Local Strategic Planning Statement.

The Department is satisfied the proposed built form and scale of the development is appropriate when considered in the context of the desired future character of the hospital precinct. The proposal provides a high-quality landscape outcome and improved pedestrian amenity and environmental outcomes on the site and is supported by the NSW Government Architect.

The Department concluded that the surrounding road network has adequate capacity to cater for the expected minor increase in traffic to the site and it would not result in significant or unacceptable impacts to the operation of the local road network in the immediate vicinity of the site. The separation of functional access for public and hospital vehicles would improve pedestrian and traffic safety in and around the site.

Further, the car parking provided would meet demand generated by the intensification of hospital facilities and accommodate existing unmet demand. This would be supported by a GTP that would further address demand by promoting a modal shift away from private vehicle travel.

The Department considers the noise impacts associated with the development can be appropriately mitigated, subject to detailed design incorporating acoustic attenuation measures to achieve recommended noise limits and the preparation of construction noise and vibration management plans.

The proposal is in the public interest as it would provide the following public benefits:

- replace existing outdated building stock with new integrated hospital facilities to improve the efficient operation of the hospital and support the healthcare needs of Griffith and surrounding communities.
- provide expanded inpatient, surgical, ambulatory care and critical care services and relocation of services currently delivered off site including aged care and rehabilitation unit to meet the needs of the ageing population.
- it will improve accessibility, security and privacy outcomes and amenity for patients, staff and visitors.
- delivery of 172 jobs during the construction phase and an additional 86 jobs in operation, resulting in a total of 441 operational jobs across the hospital campus.

Based on its assessment, the Department considers that the project is justified and in the public interest, and that the site is suitable for the proposed development.

Recommended conditions of approval and the implementation of measures detailed in the Applicant's EIS and RtS would ensure that the project would minimise and mitigate the residual environmental impacts of the project. Consequently, the Department recommends that the State significant development for the Griffith Base Hospital Redevelopment be approved, subject to the recommended conditions of consent.

## 8 Recommendation

It is recommended that the Director, Social and Infrastructure Assessments, as delegate of the Minister for Planning and Public Spaces:

- **considers** the findings and recommendations of this report.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant consent to the application.
- **agrees** with the key reasons for approval listed in the notice of decision.
- **grants consent** for the application in respect of Griffith Base Hospital Redevelopment (Report SSD-9838218), subject to the conditions in the attached development consent.
- **signs** the attached development consent and recommended conditions of consent (**Appendix D**).

Prepared by: Tom Mithen, Consultant Planner

Recommended by:



**Ingrid Berzins**  
Planning Officer  
Social and Infrastructure Assessments

Recommended by:



**David Gibson**  
Team Leader  
Social Infrastructure

## 9 Determination

The recommendation is **adopted** by:

A handwritten signature in black ink, appearing to read 'KH', with a long horizontal flourish extending to the right.

14 October 2021

**Karen Harragon**

Director

Social and Infrastructure Assessments



# Appendices

## Appendix A – List of referenced documents

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning, Industry and Environment's website as follows.

1. Environmental Impact Statement  
<http://mpweb.planningportal.nsw.gov.au/major-projects/project/40356>
2. Submissions  
<http://mpweb.planningportal.nsw.gov.au/major-projects/project/40356>
3. Applicant's Response to Submissions  
<http://mpweb.planningportal.nsw.gov.au/major-projects/project/40356>

## Appendix B – Statutory Considerations

### ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department's environmental assessment.

Controls considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
- State Environmental Planning Policy No. 64 – Advertising Structures and Signage (SEPP 64)
- Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP)
- Draft State Environmental Planning Policy (Environment) (Draft Environment SEPP)
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)
- Griffith Local Environmental Plan (GLEP) 2014.

### COMPLIANCE WITH CONTROLS

#### State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

The aims of this SEPP are to identify state significant development (SSD) and state significant infrastructure and confer the necessary functions to joint regional planning panels to determine development applications.

An assessment of the development against the relevant considerations of the SRD SEPP is provided in **Table B1**.

**Table B1** | SRD SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
<b>3 Aims of Policy</b> The aims of this Policy are as follows: (a) to identify development that is State significant development	The proposed development is identified as SSD.	Yes
<b>8 Declaration of State significant development: section 4.36</b> (1) Development is declared to be State significant development for the purposes of the Act if: a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and	The proposed development is permissible with development consent.  The proposal is for a hospital with a capital investment value (CIV) in excess of \$30 million, under clause 14 of Schedule 1 of the SRD SEPP.	Yes

Relevant Sections	Consideration and Comments	Complies
b) the development is specified in Schedule 1 or 2.		

### **State Environmental Planning Policy (Infrastructure) 2007**

The Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

The proposal is categorised as 'health services facilities'. The site is zoned R1 General Residential, defined as a 'prescribed zone' in clause 56 of the ISEPP and therefore the development is permissible with consent under clause 57(1).

Schedule 3 of the Infrastructure SEPP sets out types of development which must be referred to TfNSW. For hospitals, a threshold of 200 beds is identified as the trigger for traffic generating development (unless the site has access to a classified road or to a road that connects to classified road within 90m of the site). Notwithstanding, the application was referred to RMS (now TfNSW) and the Department has considered the submissions received from TfNSW in Sections 5 and 6 of this report. Suitable conditions have been included in accordance with TfNSW recommendations (see **Appendix D**).

The proposal is therefore consistent with the Infrastructure SEPP given the consultation and consideration of the comments from the relevant public authority.

### **State Environmental Planning Policy No. 55 - Remediation of Land**

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application. The EIS includes a contamination assessment for the site which concludes the site can be made suitable for the development, subject to remediation in relation to underground storage tanks and potential asbestos impacts. The application also includes a Remediation Action Plan (RAP).

The Department is satisfied that subject to the imposition of conditions, including appropriate removal of asbestos in accordance with the requirements of SafeWork NSW, additional investigations and remediation and validation where necessary, the site can be made suitable for the proposed use and will not result in unacceptable contamination risks. The Department is satisfied that the site will be suitable for the proposed use in accordance with the requirements of SEPP 55.

### **State Environmental Planning Policy No. 64 – Advertising and Signage**

SEPP 64 applies to all signage that under an EPI can be displayed with or without development consent and is visible from any public place or public reserve.

The development includes four new signs. Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the proposal is consistent with the objectives of the SEPP and with the assessment criteria which are contained in Schedule 1. **Table B2** demonstrates the consistency of the proposed signage with these assessment criteria.

**Table B2 | SEPP 64 compliance table**

Assessment Criteria	Comments	Compliance
<b>1 Character of the area</b>		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The proposed signs are contemporary in design, would be compatible with the existing and desired future character of the area.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	No particular themes exist for outdoor advertising in the area.	Yes
<b>2 Special areas</b>		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The proposal is not located within an environmentally sensitive area and does not detract from the amenity or visual quality of any special areas.	Yes
<b>3 Views and vistas</b>		
Does the proposal obscure or compromise important views?	No views or vistas would be impacted by the proposed signage.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?	The proposed signs would not dominate the skyline and would not impact the quality of any views or vistas.	Yes
Does the proposal respect the viewing rights of other advertisers?	Proposed signs would not impact on existing views experienced by others or existing advertising rights.	Yes
<b>4 Streetscape, setting or landscape</b>		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The signs would complement the contemporary design of the new Clinical Services Building and contribute to the visual interest of the streetscape.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposed scale and design of the signs is appropriate for the streetscape and setting within which it is proposed.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The signs are simple in design and would not result in visual clutter.	Yes

Assessment Criteria	Comments	Compliance
Does the proposal screen unsightliness?	Not applicable.	N/A
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The signs would sit well below the height of proposed buildings and trees.	Yes
Does the proposal require ongoing vegetation management?	No vegetation management is required by the proposed signs.	Yes
<b>5 Site and building</b>		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The signs are of appropriate scale and proportion and is considered relatively understated in the context of the site.	Yes
Does the proposal respect important features of the site or building, or both?	The signs is appropriately located at the site entrances and would not impact on any other important features of the site.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The purpose of the sign is to denote the entrance of the building to assist with wayfinding.	Yes
<b>6 Associated devices and logos with advertisements and advertising structures</b>		
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	Safety devices are not necessary for the proposed design of the sign/s.	Yes
<b>7 Illumination</b>		
Would illumination result in unacceptable glare?	Illumination of the signage is not proposed at this stage.	Yes
Would illumination affect safety for pedestrians, vehicles or aircraft?	Not applicable.	N/A
Would illumination detract from the amenity of any residence or other form of accommodation?	Not applicable.	N/A
Can the intensity of the illumination be adjusted, if necessary?	Not applicable	N/A



Assessment Criteria	Comments	Compliance
Is the illumination subject to a curfew?	Not applicable.	N/A
<b>8 Safety</b>		
Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?	No. Extensive views of the footpath and entrance area would still be available.	Yes
Would the proposal reduce safety for any public road?	The design and location of the proposed signage would not impact on safety of any public road.	Yes

### **State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)**

In accordance with the requirements of the SEARs, consideration has been given to SEPP 33. SEPP 33 aims to identify proposed developments for the purpose of industry or storage with the potential for significant off-site impacts, in terms of risk and or offence (odour, noise). A development is defined as potentially hazardous and / or potentially offensive, if, without mitigating measures in place, the development would have a significant risk and/ or offence impact on off-site receptors.

The information provided with the application indicates the quantities of dangerous goods to be stored on the site would be below the screening threshold quantities in the Department's Applying SEPP 33 and as such the proposed development is not potentially hazardous under SEPP 33 and the provisions of SEPP 33 do not apply.

Conditions have been recommended to ensure the development doesn't increase the storage of dangerous goods and become potentially hazardous following approval and to ensure all chemical fuels and oils are appropriately stored in accordance with relevant standards.

### **Draft State Environmental Planning Policy (Remediation of Land)**

The Draft Remediation SEPP will retain the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment.

Additionally, the provisions of the Draft Remediation SEPP require all remediation work carried out without development consent to be reviewed and certified by a certified contaminated land consultant. Remediation work is to be categorised based on the scale, risk and complexity of the work. Environmental management plans relating to post-remediation management of sites, including the ongoing operation, maintenance and management of on-site remediation measures (such as a containment cell) are to be provided to Council.

The Department is satisfied that the proposal will be consistent with the objectives of the Draft Remediation SEPP.

## Draft State Environmental Planning Policy (Environment)

The Draft Environment SEPP is a consolidated SEPP which proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Willandra Lakes World Heritage Property. Once adopted, the Draft Environment SEPP will replace seven existing SEPPs. The proposed SEPP will provide a consistent level of environmental protection to that which is currently delivered under the existing SEPPs. Where existing provisions are outdated, no longer relevant or duplicated by other parts of the planning system, they will be repealed.

Given that the proposal is consistent with the provisions of the existing SEPPs that are applicable, the Department concludes that the proposed development will generally be consistent with the provisions of the Draft Environment SEPP.

## Griffith Local Environmental Plan (GLEP) 2014

The GLEP 2014 aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Griffith LGA.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the GLEP 2014 and those matters raised by Council in its assessment of the development (refer to **Section 5**). The Department concludes the development is consistent with the relevant provisions of the GLEP 2014. Consideration of the relevant clauses of the GLEP 2014 is provided in **Table B3**.

**Table B3** | Consideration of the GLEP 2014

GLEP 2014	Department Comment/Assessment
Land Use Table – Zone R1 General Residential	<p>Hospitals are permissible with consent in the R1 general Residential zone.</p> <p>The proposal is considered to meet the objectives of the zone as it will facilitate development of social and community infrastructure to meet the needs of future residents.</p>
Clause 5.10 Heritage conservation	<p>The site is listed as containing a locally listed heritage item known as the Former Matrons House and Nurses Quarters at Base Hospital. These buildings have been approved for demolition under a separate planning pathway and the Nurses Quarters has already been demolished.</p> <p>The EIS includes a Statement of Heritage Impact to assess the impact of the proposed development on heritage items in the vicinity of the site, including St. Alban's Anglican Cathedral and the Sacred Heart Catholic Church. It concluded the proposed redevelopment will not adversely impact upon these items.</p> <p>The EIS includes an ACHR to assess the aboriginal heritage values across the site. The report recommended aboriginal consultation and archaeological test excavation. The consultation was undertaken in accordance with the <i>Aboriginal Cultural Heritage Consultation Guidelines for Proponents 2010</i>.</p> <p>Following the testing regime, the report recommends the implementation of the following mitigation measures to reduce</p>

GLEP 2014	Department Comment/Assessment
	potential impacts to Aboriginal cultural heritage. Conditions to that effect are included in the recommended development consent.

### Other policies

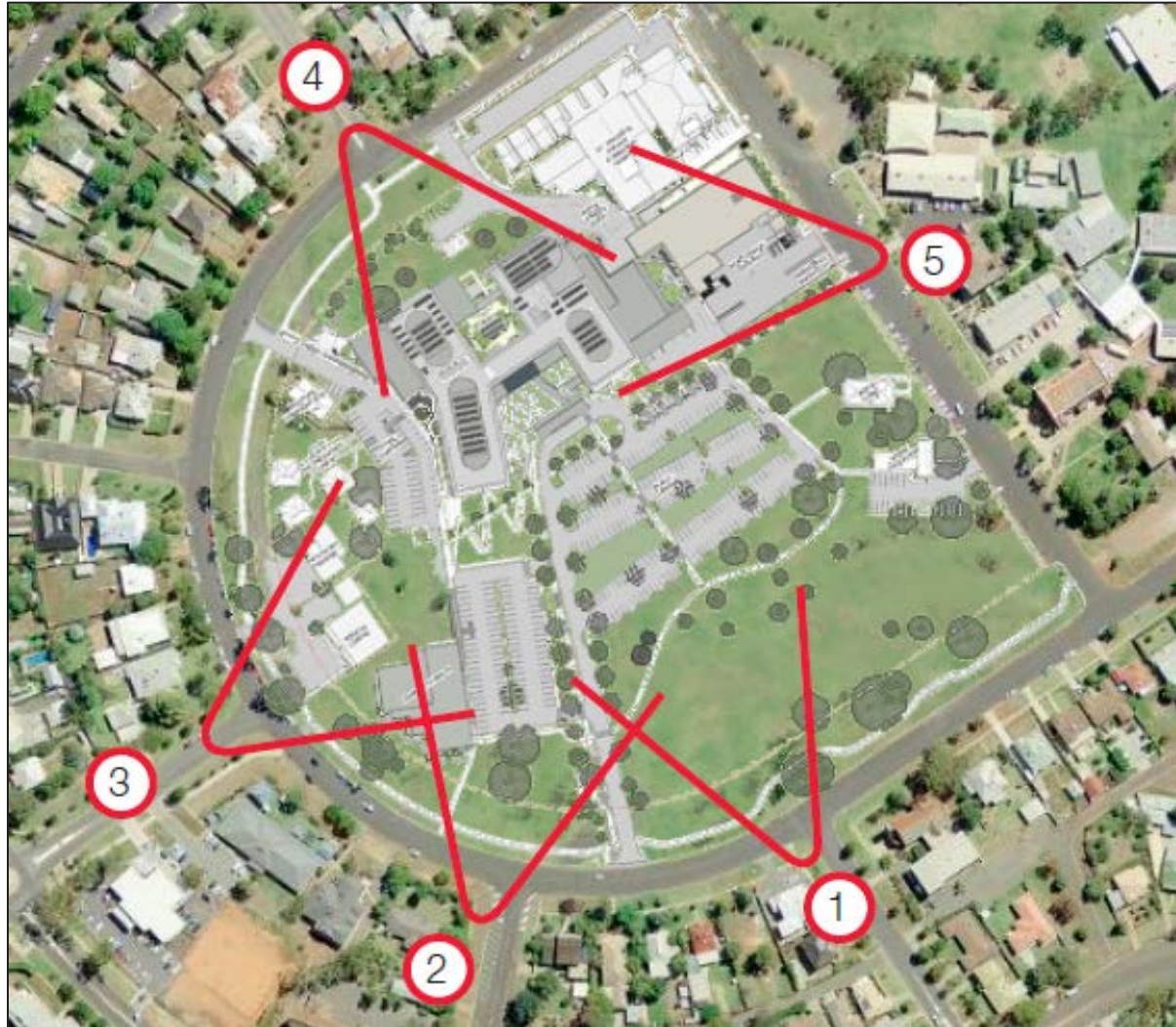
In accordance with clause 11 of the SRD SEPP, Development Control Plans do not apply to state significant development. Notwithstanding this, the objectives of relevant plans and policies that govern the carrying out of the project are appropriate for consideration in this assessment in accordance with the SEARs and are considered below.

#### *Griffith Residential Development Control Plan 2020*

The site is located within the Hospital Precinct under Griffith Residential Development Control Plan (GRDCP). The proposal responds to the desired future character of the precinct as envisaged by the GRDCP, which foreshadows increase densities in the hospital precinct for residential and medical and associated uses.

## Appendix C – View Impact Assessment

The Applicant's Visual Impact Assessment (VIA) submitted with the EIS shows the development in the immediate context of the hospital precinct. The view corridors are illustrated in **Figure 1** and the visual comparison of the existing and proposed views are illustrated in **Figures 2 to 6**.



**Figure 1** | View corridors (Source: EIS)



**Figure 2** - View from Beale Street – existing (left) and proposed (right)





**Figure 3** - View from Koorinal Avenue – existing (left) and proposed (right)



**Figure 4** - View from Anzac Street – existing (left) and proposed (right)



**Figure 5** - View from Wyangan Avenue – existing (left) and proposed (right)





**Figure 6** - View from Warrambool Street (Sacred Heart Church) – existing (left) and proposed (right)

## Appendix D – Recommended Instrument of Consent