



STATEMENT OF ENVIRONMENTAL EFFECTS

Temora Health Service
Remediation

Prepared for
HEALTH INFRASTRUCTURE
3 February 2025



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Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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1. INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared by Urbis Ltd on behalf of Health Infrastructure (HI, the Applicant) in support of a Development Application (DA) for remediation works at the existing Temora Health Facility at 169-189 Loftus Street, Temora (Lot 2 DP 572392) (the **site**). The site is located on Wiradjuri Country.

The application seeks development consent for remediation works in accordance with the Remediation Action Plan (RAP) prepared for the site. The proposed remediation works would facilitate the demolition of the existing health facility and the construction of the new Temora Health Service facility on the site. The demolition and new building are subject to a separate activity approval under Part 5 of the *Environmental Planning and Assessment Act 1979* ('**EP&A Act**'). A review of environmental factors (REF) report has been prepared to assess the impacts of this activity and is being exhibited concurrently with this DA.

Section 4.7 of the *State Environmental Planning Policy (Resilience and Hazards) 2021* (**RH SEPP**) identifies that Category 1 remediation work can only be undertaken with consent. The site is a heritage item and the remediation work proposed under the RAP cannot be approved under the Part 5 REF process. Accordingly, development consent is sought from Temora Shire Council (**Council**) in accordance with Part 4 of the Environmental EP&A Act.

Part 4 Division 4 of the EP&A Act allows for DAs to be made by, or on behalf of the Crown. Section 294 of the *Environmental Planning and Assessment Regulation 2021* (*Regulations*) prescribes that a public authority is the Crown for the purposes of Part 4 Division 4 of the EP&A Act. Health Infrastructure (HI) is a public authority and is therefore a Crown authority for the purposes of this DA and Clause 4.32 of the EP&A Act. Council cannot refuse a Crown DA, nor impose conditions of consent except with approval of the applicant or Minister.

The proposed remediation works have an estimated development cost (EDC) of \$195,000 ex GST.

1.1. REPORT STRUCTURE

The SEE:

- describes the site and proposed development,
- provides an assessment of the proposal against the relevant matters for consideration under section 4.15 of the EP&A Act 1979,
- explains the likely impacts of the proposed development on the natural and built environment, and
- outlines how these impacts are proposed to be reduced or mitigated.

The SEE should be read together with the architectural plans and supporting documentation submitted with the DA under separate cover as follows.

Table 1 Supporting Documentation

| Title | Prepared By | Short Reference |
|-----------------------------------|-------------------------------------|-----------------|
| Survey Plans | Walpole Surveying | Survey Plans |
| Architectural Plans | HDR | Plans |
| Preliminary Site Investigation | JK Environments | PSI |
| Detailed Site Investigation | JK Environments | DSI |
| Human Health Risk Assessment | Environmental Risk Sciences Pty Ltd | HHRA |
| Remediation Action Plan | JK Environments | RAP |
| Estimated Development Cost Report | MBM | EDC Report |

2. SITE ANALYSIS

2.1. SITE LOCATION

The site is located in the Temora Shire Local Government Area (LGA) in the Riverina Region of NSW. Temora Shire LGA covers approximately 2,802km², 423km southwest of Sydney and 80km north of Wagga Wagga. The population is 6,274 residents. The LGA comprises the town of Temora, villages of Aria Park and Springdale and rural settlement on farming properties and small localities. Temora's main employment sector is agriculture, followed by retail trade, health care and social assistance, education and training, accommodation and food services and construction.

The site address is 169-189 Loftus Street, Temora which is legally described as Lot 2 DP 572392 with a total area of 3.177ha. The site is on the traditional land of the Wiradjuri People. The site is owned by the Health Administration Corporation (HAC). It is within the Murrumbidgee Local Health District (MLHD).

The location of the site is illustrated in **Figure 1** and **Figure 2**.

Figure 1 Local Context



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Figure 2 Regional Context Map



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2.2. SITE DESCRIPTION

The key features of the site are summarised in the following table and shown in **Figure 3**.

Table 2 Site Description

| Site Characteristic | Description |
|---------------------------------------|---|
| Country | Wiradjuri Country |
| Legal Description (Title Particulars) | Lot 2 DP 572392 |
| Site Ownership | Health Administration Corporation (HAC) |
| Title Encumbrances (Easements etc.) | The site contains drainage crossings within Gloucester Street. There is existing stormwater infrastructure within a drainage easement through the downstream neighbour, Whiddon Temora. |
| Zoning | SP2 Infrastructure under the Temora LEP 2010 (Figure 5) |
| Existing Use / Structures | The site is occupied by the existing Temora Health Facility, which includes the following: <ul style="list-style-type: none"> ▪ Main hospital building – 28-bed facility inclusive of twenty-two (22) inpatient beds and six (6) maternity beds. ▪ Seven ancillary buildings Photographs of the existing development are contained below in Figure 4 . |
| Site Area | The site is an irregular shaped allotment of approximately 31,795 sqm. |
| Site Frontage | The site fronts Loftus Street to the south and Gloucester Street to the west. |

| Site Characteristic | Description |
|------------------------|---|
| Topography | The site topography is gently undulating and slopes from +320 to +306 AHD towards the western boundary (subject to land survey). The existing hospital is located on the elevated northern part of the site. The area occupied by the existing hospital has been levelled to accommodate the existing development. |
| Vegetation | The site currently contains many mature trees, planted in the 1940s by the Board of Directors of the hospital. These trees form an arboretum that is recognised as contributing to the heritage significance of the site. |
| Flooding/Overland Flow | The site is not identified as flood prone land. |
| Heritage | The main hospital building, staff accommodation block and arboretum are a heritage item of local significance I108 under the <i>TLEP 2010</i> (Figure 6). Heritage assessment undertaken to support the master planning process found that the existing hospital building is of moderate heritage value as a representative example of its type, and the staff accommodation building is of low significance. The landscaped arboretum is of high heritage significance. |
| Aboriginal Archaeology | The Aboriginal Archaeological Technical Report prepared by AMAC Archaeological for the REF confirms that there are no gazetted Aboriginal places in the study area and the site has nil archaeological potential for intact Aboriginal objects and/or features to be present. |
| Bushfire | The site is not identified as bushfire prone land. |
| Biodiversity | An ecological assessment was prepared by Abel Ecology for the main works REF and concludes the site does not contain any critical habitat, threatened species or ecological population or communities. The project area is located in a modified urban environment with areas of planted landscaping. It is not within a declared area of outstanding biodiversity value. |
| Geotechnical | A Geotechnical Investigation was prepared by JK Australia for the main works REF which identified a subsurface profile of fill over residual silty clay, underlain by weathered andesite bedrock, with no groundwater encountered during drilling. |
| Contamination | <p>The site has historically been used for residential and agricultural (grazing) purposes until the late 1930s and has been used for a hospital since.</p> <p>A Preliminary Site Investigation Report (PSI) and a Detailed Site Investigation Report (DSI) were undertaken by JK Environments for the main works REF. The DSI identified asbestos containing material (ACM) in soil at one location on the site, and uncertainties regarding the extent of contamination across the site due to access constraints.</p> <p>A Human Health Risk Assessment (HHERA) was also undertaken by Environmental Risk for the main works REF. The HHERA concluded that a RAP was not required for the site. However, the HHERA did not consider asbestos, and management and remediation of asbestos is required.</p> <p>A Remedial Action Plan (RAP) was prepared JK Environments which concludes that the site can be made suitable for the proposed activity, subject to the remediation works which are the subject of this development application.</p> |
| Vehicular/Site Access | <p>The main access point is via Loftus Street, a local road which directly connects the site to the B94 Major Arterial Road ('Burley Griffin Way'). There is an additional exit only to Gloucester Street. A minor service entrance provides access to the eastern side of the site from an unsealed road.</p> <p>Temora Railway Station is located approximately 2.5km west of the site. It is not served by passenger routes but retains a function as signalling facility and a stop on the Lachlan Valley tourist railway.</p> |

| Site Characteristic | Description |
|--------------------------|--|
| Adjacent land uses North | Temora TAFE adjoins the site. Temora High School is located north-west of the site. |
| Adjacent land uses East | Utilities infrastructure (transmission tower, substation, pumping station) and vacant agricultural land beyond. |
| Adjacent land uses South | The land uses are predominantly general residential. |
| Adjacent land uses West | Whiddon Temora Residential Care and beyond this is Gloucester Park, a local open space with playground facilities. |

Figure 3 Aerial Photograph



Photographs of the existing development and surrounding context are provided below.

Figure 4 Site Photographs



Picture 1 West side of the Main Hospital Building and Front of Boiler and Waste Room

Northrop



Picture 2 Back of Main Hospital Building.

Northrop



Picture 3 Main Entrance (right) and pathology entrance (left)

Northrop



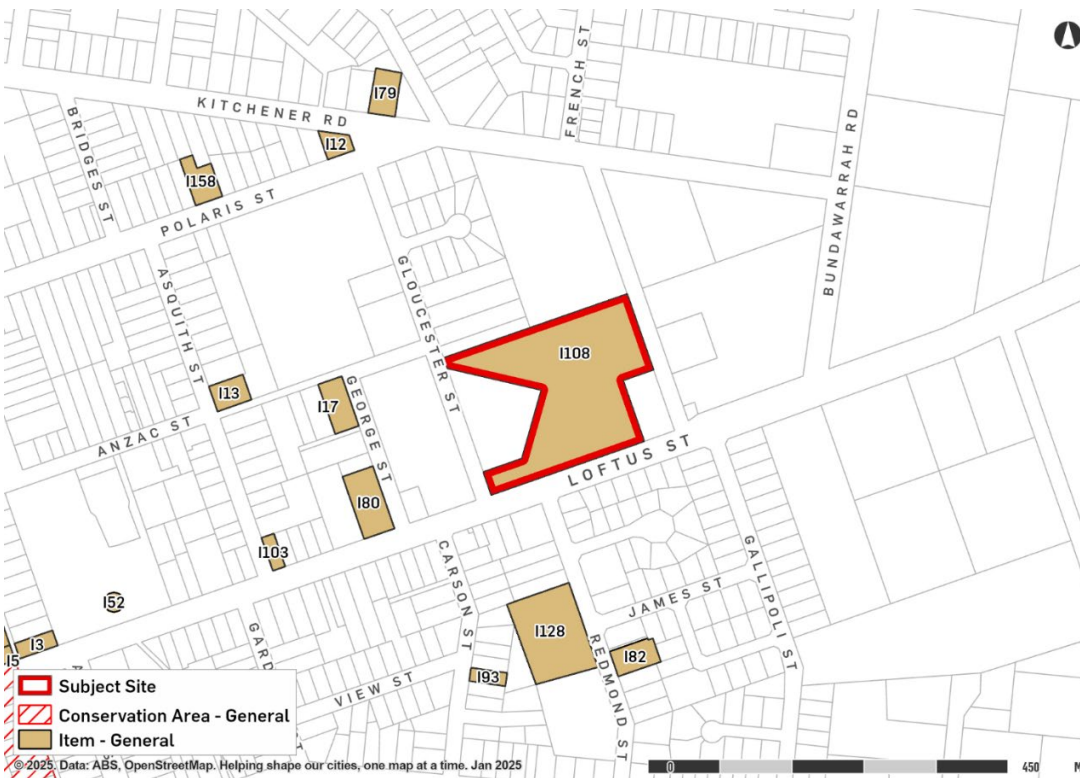
Picture 4 Back of Main Building (Northern side) behind Consultation Rooms.

Northrop

Figure 5 Land use zoning



Figure 6 Heritage context



3. BACKGROUND

3.1 TEMORA HEALTH SERVICE REDEVELOPMENT

The NSW Government has committed \$95 million to the Temora Health Service redevelopment as part of the \$500 million rural health boost. In accordance with state government funding, Health Infrastructure NSW has proposed to redevelop the Temora health service. The scope of the activity includes:

- Demolition of the existing hospital building, nurses' accommodation and associated buildings;
- Construction of a single-storey hospital building on the site of the demolished building. The new building is proposed to retain the setting of 'Hospital on the Hill' with landscaped gardens as a key feature of the site;
- Improved car parking for patients, staff and visitors;
- Separate emergency and service vehicle entry; and
- Hydraulic, ICT, fire and electrical infrastructure services upgrades.

Under Section 2.61(1) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* ('**TI SEPP**') development by or on behalf of a public authority can be carried out without consent on any land if the development is carried out within the boundaries of an existing health services facility.

Section 4.1 of the EP&A Act states that if an environmental planning instrument (EPI) provides that development may be carried out without the need for development consent, a person may carry the development out, in accordance with the EPI, on land to which the provision applies. However, the environmental assessment of the development is required under Part 5 of the Act. As noted previously, a REF has been prepared to support the activity and will be exhibited concurrently with this DA.

3.1. ENVIRONMENTAL INVESTIGATIONS

3.1.1. Site Investigations

JK Environments undertook a Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI) at the site to support the REF process.

The DSI included analysis of soil samples from the site for a range of chemicals. A range of potential sources of contamination were identified relating to current and historical activities at the site, and the use of imported fill material. The concentrations of most chemicals were below the Limit of Reporting (LOR). However, bonded asbestos exceeding the health screening level identified for the site, some heavy metals, Polycyclic Aromatic Hydrocarbons (PAHs) and petroleum hydrocarbons were reported in the soils.

A Human Health Risk Assessment (HHERA) was subsequently undertaken by Environmental Risk. The purpose of the HHERA was to determine if the concentrations of chemicals reported in the soil posed an unacceptable risk to human health or ecosystems at the site, and to determine if a RAP was required to address potential risk issues related to contaminants in the soil.

Based on the data provided and in relation to heavy metals, TRH and PAHs in soil, the HHERA concluded that a RAP was not required for the site. However, the HHERA did not consider asbestos, and management and remediation of asbestos is required.

3.1.2. Remediation Action Plan

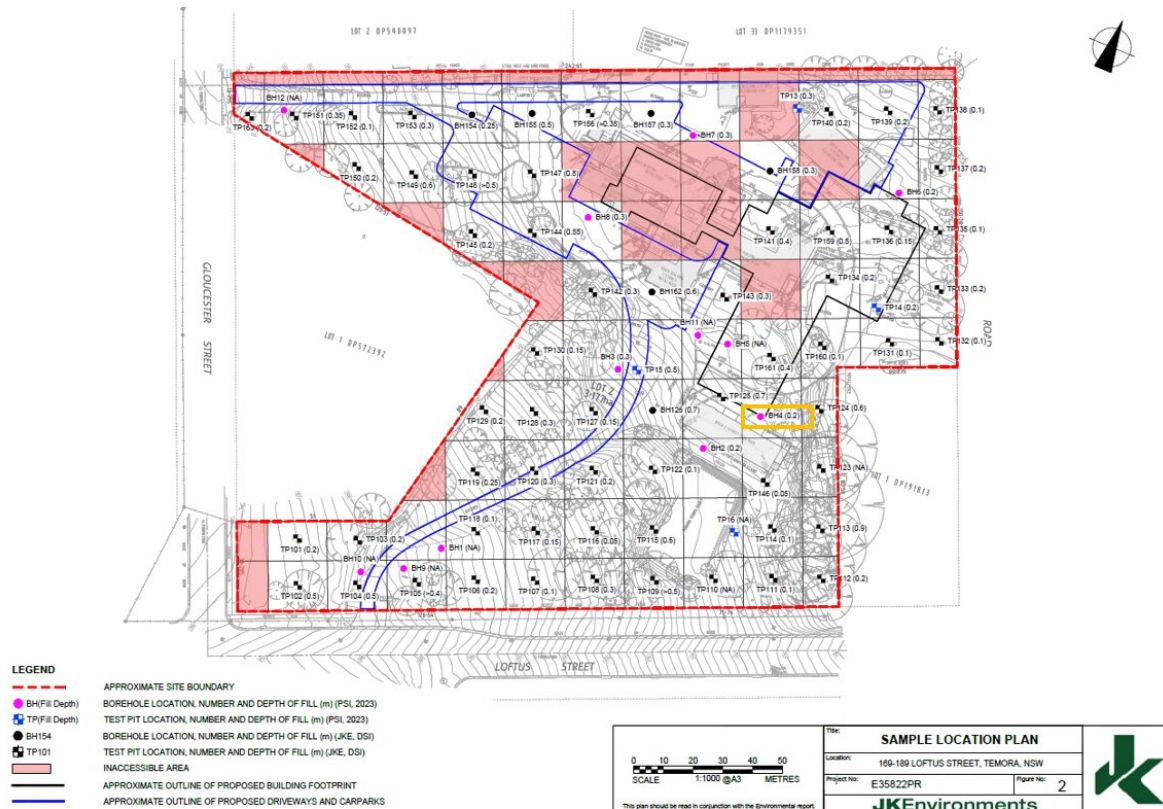
Based on the findings of the PSI and DSI, a RAP was prepared by JK Environments to provide the framework for the remediation of the known localised asbestos impacts. It also addresses data gaps and provides remediation approaches as a contingency in the event that soil contamination that poses a potentially unacceptable risk to receptors is identified through the data gap investigation process.

The RAP details the following approach to remediation on the site:

- Excavation and disposal of the asbestos-impacted fill in the vicinity of BH4 (Figure 7)
- Contingencies for the unexpected finds of other contaminated areas on the site, including:

- excavation and off-site disposal for small quantities of contaminated soils
- cap and containment for larger quantities of contaminated soils.

Figure 7 Site contamination location (shown in orange box)



Source: JK Environments

3.2. NEED FOR THE DA

Section 4.7 of the *State Environmental Planning Policy (Resilience and Hazards) 2021 (RH SEPP)* identifies that Category 1 remediation work can only be undertaken with consent.

Section 4.8 of the RH SEPP defines Category 1 remediation work as remediation work carried out to a heritage item. Therefore, the remediation work proposed under the RAP cannot be approved under the Part 5 REF process and requires development consent.

Section 4.9 of the RH SEPP identifies that the consent authority for remediation work is the Council for the local government area in which the land is situated. Therefore, Temora Shire Council is the consent authority for the proposal.

3.1.1 ADDITIONAL STUDIES RELATED TO THE TEMORA HEALTH SERVICE REDEVELOPMENT

To support the Temora Health Service redevelopment, a suite of specialist studies were undertaken to consider impacts of the construction and operation of the proposed development on the site and surrounding area. The documents of relevance to this DA include:

- Preliminary Construction Management Plan prepared by Health Infrastructure NSW and dated 26 March 2024
- Flooding Assessment prepared by GHD and dated 19 June 2024
- Noise and Vibration Impact Assessment prepared by GHD and dated 8 August 2024
- Biodiversity Development Assessment Report prepared by Abel Ecology and dated 13 August 2024
- Communications and Engagement Plan prepared by Health Infrastructure NSW and dated 7 August 2024
- Traffic and Access Impact Assessment Report prepared by GHD and dated 16 April 2024
- Preliminary Waste Management Plan prepared by Health Infrastructure NSW and dated 20 August 2024
- Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared GML Heritage and dated 24 January 2024
- Statement of Heritage Impact prepared by NGH and dated 9 September 2024
- Geotechnical Investigation Report prepared by JK Geotechnics and dated 26 May 2023.

These studies and management plans are relevant to the management of potential impacts during remediation work and are discussed at **Section 5.3**.

4. DEVELOPMENT DESCRIPTION

The proposal aims to remediate the site in accordance with the Remedial Action Plan prepared by JK Environments to reduce contamination-related risks to human health and the environment and to render the site suitable for the redevelopment of the Temora health facility (subject to a separate REF process). The primary aim of the remediation is to mitigate risks from the occurrence of asbestos and other contamination in soil.

Previous site investigations undertaken by JK Environments identified bonded asbestos containing material (ACM) in soil at one location on the site above the health screening level (refer **Figure 7**). Due to access constraints caused by existing buildings and structures there are uncertainties regarding the extent of contamination across the site. These are recognised as data gaps within the JK Environments reporting.

To determine the appropriate remediation strategy for the site, the RAP considered the contaminated material identified in the DSI and the hierarchy set out in the National Environmental Protection Measure (NEPM) for the remediation of contaminated sites (refer **Table 3**).

Table 3 Remediation approaches considered

| Hierarchy in the NEPM | Remediation Approach | Consideration for the site |
|-----------------------|---|---|
| 1 | On-site soil treatment | Contaminated fill is present in cohesive clayey soils, meaning physical removal is difficult, time consuming and less effective. |
| 2 | Off-site soil treatment, after which the soil is returned to the site | Not suitable for asbestos and unlikely to be viable / practical for small quantities of soil impacted by other contaminants. |
| 3 | Containment and removal to approved facility | Applicable where asbestos exceeds health screening levels and for other contaminants provided there is no migration risk to groundwater. May not be economically viable for larger quantities of contaminated material due to cost. |
| 4 | Containment and implementation of an appropriate management strategy (i.e. material stays onsite untreated) | Applicable when managing low concentrations of asbestos (below the health screening level). |

The RAP concluded that the preferred remediation option for the bonded asbestos identified at BH4 would be Option 4, to contain the contaminated soil, excavate it and remove it to an approved facility. The area for remediation is currently identified as a square 20m by 20m, to a depth of 0.2m. The extent of remediation required will be validated by further on site testing, and may be reduced. Option 4 was chosen due to the localised and small scale nature of the contamination identified and the ability to avoid long-term site management.

The RAP also provides remedial contingency options given the uncertainties regarding the extent of contamination across the site due to access constraints. The RAP recommends additional investigations to identify potential contamination in other areas of the site. The RAP notes that should further contamination be identified during additional investigations; the preferred remedial contingency options would include:

- excavation and off-site disposal for small quantities of contaminated soils
- cap and containment for larger quantities of contaminated soils, which would trigger the requirement for long-term management of the site via an Environmental Management Plan.

The RAP concludes that the site can be made suitable for the proposed new Temora Health Service Facility, subject to the implementation of the recommended remediation measures.

4.1 SEQUENCE OF WORKS

The RAP identifies the following sequencing of remediation works:

- Pre-commencement meeting;
- Site establishment and demolition;
- Pre-remediation (data gap) investigation and any additional associated reporting;
- Remediation and validation of remedial works (where applicable); and
- Validation of remedial works and imported soil materials.

The RAP specifies that remediation and validation activities, including the data gap investigation, will occur concurrently with the demolition/development works to facilitate the implementation of the requirements under the RAP.

5. PLANNING ASSESSMENT

5.1. APPROVALS UNDER OTHER ACTS

Table 4 Approvals under other Acts

| Act | Relevance | Assessment |
|--|-----------|---|
| <i>Environmental Planning and Assessment Act 1979</i> | Yes | <p>Section 4.2 of the EP&A Act concerns development that requires consent and identifies that approval is required and that development must be carried out in accordance with consent.</p> <p>The DA is a Crown DA in accordance with Clause 4.32 of the EP&A Act. Council cannot refuse a Crown DA, nor impose conditions of consent except with approval of the applicant or Minister.</p> |
| <i>Rural Fires Act 1997</i> | No | The site is not identified on the Bushfire Prone Land Map. |
| <i>Biodiversity Conservation Act 2016</i> | No | <p>An ecological assessment was been prepared by Abel Ecology as part of the main works REF which concludes the site does not contain any critical habitat, threatened species or ecological population or communities. The project area is located in a modified urban environment with areas of planted landscaping. It is not within a declared area of outstanding biodiversity value.</p> <p>The proposal relates to remediation works and the proposed works will not have a significant effect on species, ecological communities or their habitats.</p> |
| <i>Water Management Act 2000</i> | No | The works are not within 40 metres of a watercourse. |
| <i>Contaminated Land Management Act 1997</i> | Yes | <p>Section 60 of the Contaminated Land Management Act 1997 identifies the need to notify the EPA of contamination in certain circumstances. The RAP details that the requirement to notify the EPA would be assessed as part of the site validation process and would be largely dependent on the asbestos air monitoring results obtained during remediation, where applicable.</p> <p>The RAP concludes that the results obtained on the site to date do not trigger a need to notify the EPA.</p> |
| <i>Protection of the Environment Operations Act 1997</i> | Yes | <p>Section 143 of the POEO Act 1997 states that if waste is transported to a place that cannot lawfully be used as a waste facility for that waste, then the transporter and owner of the waste are each guilty of an offence. The transporter and owner of the waste have a duty to ensure that the waste is disposed of in an appropriate manner.</p> <p>Appropriate waste tracking would be undertaken for all waste disposed off site in accordance with the POEO Act 1997. Remediation activities would also be carried out in a manner which does not result in the pollution of waters, refer to Section 5.3.3.</p> |
| <i>Heritage Act 1977</i> | No | <p>The Heritage Act 1977 (Heritage Act) was passed for the purpose of conserving items of environmental heritage. The Heritage Act is designed to protect both known heritage items and potential archaeological remains or 'relics'). The Heritage Act establishes the State Heritage Register.</p> <p>There are no State Heritage listed items within the project area.</p> |
| <i>Roads Act 1993</i> | No | No works are proposed to surrounding state or local roads. Road works associated with the main works REF would be subject to approval from Temora Council to conduct these works in accordance with the requirements of the <i>Roads Act 1993</i> . |
| <i>National Parks and Wildlife Act 1974</i> | No | An Aboriginal Cultural Heritage Assessment Report (ACHAR) and Aboriginal Archaeological Technical Report were prepared for the main works REF which confirmed that there are no gazetted Aboriginal places in the study area and it has nil archaeological potential for intact Aboriginal objects and/or features to be present. |

| Act | Relevance | Assessment |
|-----|-----------|------------|
|-----|-----------|------------|

An unexpected finds protocol would be implemented to manage any unexpected Aboriginal archaeological finds during the works.

5.2. CONSIDERATION OF RELEVANT PROVISIONS

The following tables address the relevant matters for consideration under section 4.15(1)(a) of the EP&A Act 1979.

5.2.1. Applicable Environmental Planning Instruments

Table 5 Applicable Environmental Planning Instruments

| Matter for Consideration - s4.15(1)(a)(i) | Consistency |
|---|--|
| <p>State Environmental Planning Policy (Resilience and Hazards) 2021</p> | <p><i>State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)</i> provides a state-wide planning approach for the remediation of land to reduce the risk of harm to human health or the environment.</p> <p>Section 4.7 of the RH SEPP) identifies that Category 1 remediation work can only be undertaken with consent.</p> <p>Section 4.8 of the RH SEPP defines Category 1 remediation work as remediation work carried out to a heritage item. Therefore, the remediation work proposed under the RAP requires development consent. This DA seeks development consent from Council in accordance with this requirement.</p> <p>Under Chapter 4, where a DA is made concerning a land portion that is contaminated, the consent authority must not grant development consent unless:</p> <ul style="list-style-type: none"> a) <i>It has been considered whether the land is contaminated, and</i> b) <i>If the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and</i> c) <i>If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.</i> <p>As outlined in Section 4 and Section 5.3 of this SEE, the RAP confirms that the site can be made suitable for its future intended use as health facility, subject to the implementation of appropriate remediation and mitigation measures outlined within the RAP and the Hazardous Material Inspection Reports, as well as validation of the RAP by a site auditor.</p> <p>It is expected that a condition of consent requiring the implementation of an unexpected finds protocol will be imposed.</p> <p>In accordance with Clauses 4.14 and 4.15 of the RH SEPP, a notice of completion of remediation work would also be given to Council within 30 days of completion of the work.</p> |
| <p>State Environmental Planning Policy (Transport and Infrastructure) 2021</p> | <p><i>State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP)</i> aims to facilitate the effective delivery of infrastructure across the State. Division 10 of the TI SEPP outlines the approval requirements for <i>health services facilities</i>.</p> <p>The site is zoned SP2 infrastructure under the TLEP 2010. SP2 is a prescribed zone under the TI SEPP.</p> |

| Matter for Consideration - s4.15(1)(a)(i) | Consistency |
|---|---|
| | <p>Section 2.61(1) 'Development permitted without consent' of the TI SEPP permits development by or on behalf of a public authority without consent on any land if the development is carried out within the boundaries of an existing health services facility.</p> <p>Section 4.1 of the EP&A Act states that if an EPI provides that development may be carried out without the need for development consent, a person may carry the development out, in accordance with the EPI, on land to which the provision applies. However, the environmental assessment of the development is required under Part 5 of the Act.</p> <p>The Temora Health Facility redevelopment will be undertaken by HI within the boundaries of an existing health services facility. In accordance with TI SEPP requirements, a REF has been prepared to support the Part 5 assessment process.</p> |
| Temora Local Environmental Plan 2010 | |
| 2.1 Land Use Zones | <p>The site is zoned SP2 Infrastructure (Hospital). The objectives of the zone are:</p> <ul style="list-style-type: none"> ▪ To provide for infrastructure and related uses. ▪ To prevent development that is not compatible with or that may detract from the provision of infrastructure. <p>The proposed remediation works are permitted with consent in accordance with Section 4.7 of the RH SEPP. The proposed remediation works would support the future redevelopment of the site in accordance with the objectives of the zone.</p> |
| 5.10 Heritage conservation | <p>The main health service building, staff accommodation block and arboretum are a heritage item of local significance I108.</p> <p>A Statement of Heritage Impact was prepared in support of the REF which assessed the heritage impacts of the proposal and concluded that the Proponent has considered various options to avoid or minimise any heritage impacts of the proposed activity and recommends mitigation measures to manage heritage impacts.</p> <p>The proposed remediation works would not have any impacts on the heritage significance of the site.</p> |

5.2.2. Development Control Plan Considerations

Table 6 Applicable Development Control Plans

| Matter for Consideration - s4.15(1)(a)(iii) | Consistency |
|---|---|
| Temora Shire Development Control Plan 2012 | |
| Contaminated land | <p>The Applicant has investigated the contamination of the site in accordance with the four-stage investigation process recommended by Council. The land would be remediated in accordance with the NSW Environmental Protection Authorities <i>Managing Land Contamination – Planning Guidelines</i> and the RH SEPP. The disposal of contaminated material from the site would require approval from Council.</p> |
| Erosion and sediment control | <p>Erosion and sediment control measures would be implemented during remediation works in accordance with Council's requirements, a detailed Erosion and Sediment control plan and any conditions of consent.</p> |

| Matter for Consideration - s4.15(1)(a)(iii) | Consistency |
|---|--|
| Heritage and conservation | <p>The main health service building, staff accommodation block and arboretum are a heritage item of local significance I108.</p> <p>A Statement of Heritage Impact was prepared in support of the REF which assessed the heritage impacts of the proposal and concluded that the Proponent has considered various options to avoid or minimise any heritage impacts of the proposed activity and recommends mitigation measures to manage heritage impacts.</p> <p>The proposed remediation works would not have any impacts on the heritage significance of the site.</p> |

5.2.3. Any Planning Agreement

The site is not affected by a planning agreement.

5.2.4. Relevant Matters Prescribed by the Regulations

There are no additional relevant matters for consideration prescribed by the Regulations.

5.3. IMPACTS

The sections below assess the likely environmental, social and economic impacts of the proposed remediation works in accordance with section 4.15(1)(b) of the EP&A Act 1979.

5.3.1. Contamination

The proposed remediation works seek to remove the contamination that has been identified on the site to make the site suitable for the proposed Temora Health Service facility which is subject to a separate Part 5 assessment process in accordance with the TI SEPP.

The RAP also recognises information gaps in the site investigations undertaken to identify contamination of the site and the potential for additional contamination to be identified. The RAP recommends additional investigations and includes contingency measures for the management of any additional contamination.

The proposed remediation works, to both identified and potential future areas of contamination, would be undertaken in accordance with the RAP prepared by JK Environments, which can be secured through a condition of consent.

Any unexpected finds of contamination during remediation works would be managed in accordance with the Unexpected Finds Protocol included in the RAP, which can also be secured through a condition of consent.

The RAP recommends a validation process after remediation works have been completed to confirm that the site is suitable for the proposed development.

Subject to the implementation of the remediation and validation process detailed in the RAP, the site can be made suitable for the proposed redevelopment.

5.3.2. Waste Management

Any waste generated by remediation works would be managed in accordance with the RAP and the Preliminary Waste Management Plan (WMP) prepared by HI to support the REF. Contaminated and hazardous materials, including asbestos containing material, will be removed and properly disposed by licensed contractors.

5.3.3. Erosion and Sediment Control

The RAP recommends the preparation of a detailed soil and water management plan prior to the commencement of site works. The sediment and erosion control plan will include measures to minimise impacts to local water quality, including:

- The use silt fences to control the surface water runoff at all appropriate locations of the site;

- Placing all stockpiled materials within an erosion containment boundary with silt fences and sandbags employed to limit sediment movement;
- Locating the containment area away from drainage lines/low-points, gutters, stormwater pits and inlets and the site boundary; and
- No discharging of liquid waste or runoff to the stormwater or sewerage system without the approval of the appropriate authorities.

Sediment and erosion control measures can be implemented through conditions of consent.

5.3.4. Heritage

The existing hospital and associated outbuildings (including the nurses accommodation building) are collectively a heritage item of local significance ('1108') under the *Temora Local Environmental Plan 2010* ('TLEP 2010') (refer Figure 6).

Heritage assessment undertaken to support the master planning process found that the existing hospital building is of moderate heritage value as a representative example of its type, and the staff accommodation building is also of low significance. The landscaped arboretum is of high heritage significance.

A Statement of Heritage Impact was prepared in support of the REF which assessed the heritage impacts of the proposal and concluded that the Proponent has considered various options to avoid or minimise any heritage impacts of the proposed activity and recommends mitigation measures to manage heritage impacts.

The proposed remediation works would not have any impacts on the heritage significance of the site.

5.3.5. Aboriginal Archaeology

The Aboriginal Archaeological Technical Report prepared by AMAC Archaeological for the main works REF confirms that there are no gazetted Aboriginal places in the study area and the site has nil archaeological potential for intact Aboriginal objects and/or features to be present. The proposed remediation works would be subject to an unexpected finds protocol to manage the unexpected finds of Aboriginal archaeology which can be facilitated through a condition of consent.

5.3.6. Other Construction Impacts

Other potential construction impacts including those related to air quality, traffic, noise and vibration and stormwater, would be managed in accordance with the Preliminary Construction Management Plan prepared by HI submitted with the REF and any conditions imposed by the consent authority on this application.

5.4. SUITABILITY OF THE SITE

- The proposed remediation works are required to remove contaminated material on the site and enable the site to be redeveloped for a health facility.
- In accordance with s4.15(1)(c) of the EP&A Act the site is considered highly suitable for the broader proposed development for these reasons:
 - There is an unacceptable risk to future occupants and site workers due to the contaminants identified across the site. The proposed remediation works will appropriately remove the identified contaminants. The proposed management measures will also ensure that remediation works does not result in any additional adverse impacts. These remediation works will facilitate the holistic Temora Health Service redevelopment.
 - The site is zoned for infrastructure uses.
 - There are no environmental constraints which cannot be satisfactorily managed or mitigated to avoid significant adverse impacts on the environment or amenity of the site or adjoining properties.

5.5. SUBMISSIONS

In accordance with s4.15(1)(d) of the EP&A Act, it is acknowledged that submissions arising from the public notification of this application will need to be considered by the Consent Authority in its assessment. The

proponent will undertake to formally respond and attempt to resolve to any relevant issues relating to the proposed development.

5.6. THE PUBLIC INTEREST

In accordance with s4.15(1)(e) of the EP&A Act the proposed development is considered in the public interest for these reasons:

- The proposal is consistent with relevant State and local strategic plans and complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal would have no impacts on the heritage significance of the site. Heritage impacts of the broader redevelopment have been considered separately as part of the REF.
- The proposal will remediate the site to reduce contamination-related risks to human health and the environment, facilitating the future redevelopment of the site, being the demolition and replacement of the existing hospital buildings, to support the delivery of contemporary healthcare services to the rural community of Temora.

6. CONCLUSION

The SEE demonstrates the proposed development is appropriate for the site and the locality for these reasons:

- ✔ The proposal satisfies the objectives of all relevant planning controls and would facilitate the broader Temora hospital redevelopment. The remediation works align with the zoning objectives by ensuring the site is used for its intended purpose.
- ✔ The remediation works would facilitate the broader Temora Health Service redevelopment which will provide significant benefits to the local community by improving healthcare services.
- ✔ The proposed development includes comprehensive remediation of contaminated land, ensuring the site is safe for future use. It has been demonstrated that the proposal would not result in any unacceptable impacts on the built or natural environment.
- ✔ The proposal is in the public interest as it would reduce contamination-related risks to human health and the environment, rendering the site suitable for future redevelopment.

Accordingly, it is submitted that the proposal is in the public interest and should be approved subject to appropriate consent conditions.

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APPENDIX A

SURVEY PLAN

APPENDIX B

ARCHITECTURAL PLANS

APPENDIX C

PRELIMINARY SITE INVESTIGATION

APPENDIX D

DETAILED SITE INVESTIGATION

APPENDIX E

HUMAN HEALTH RISK ASSESSMENT

APPENDIX F

REMEDIATION ACTION PLAN

APPENDIX G

ESTIMATED DEVELOPMENT COST REPORT