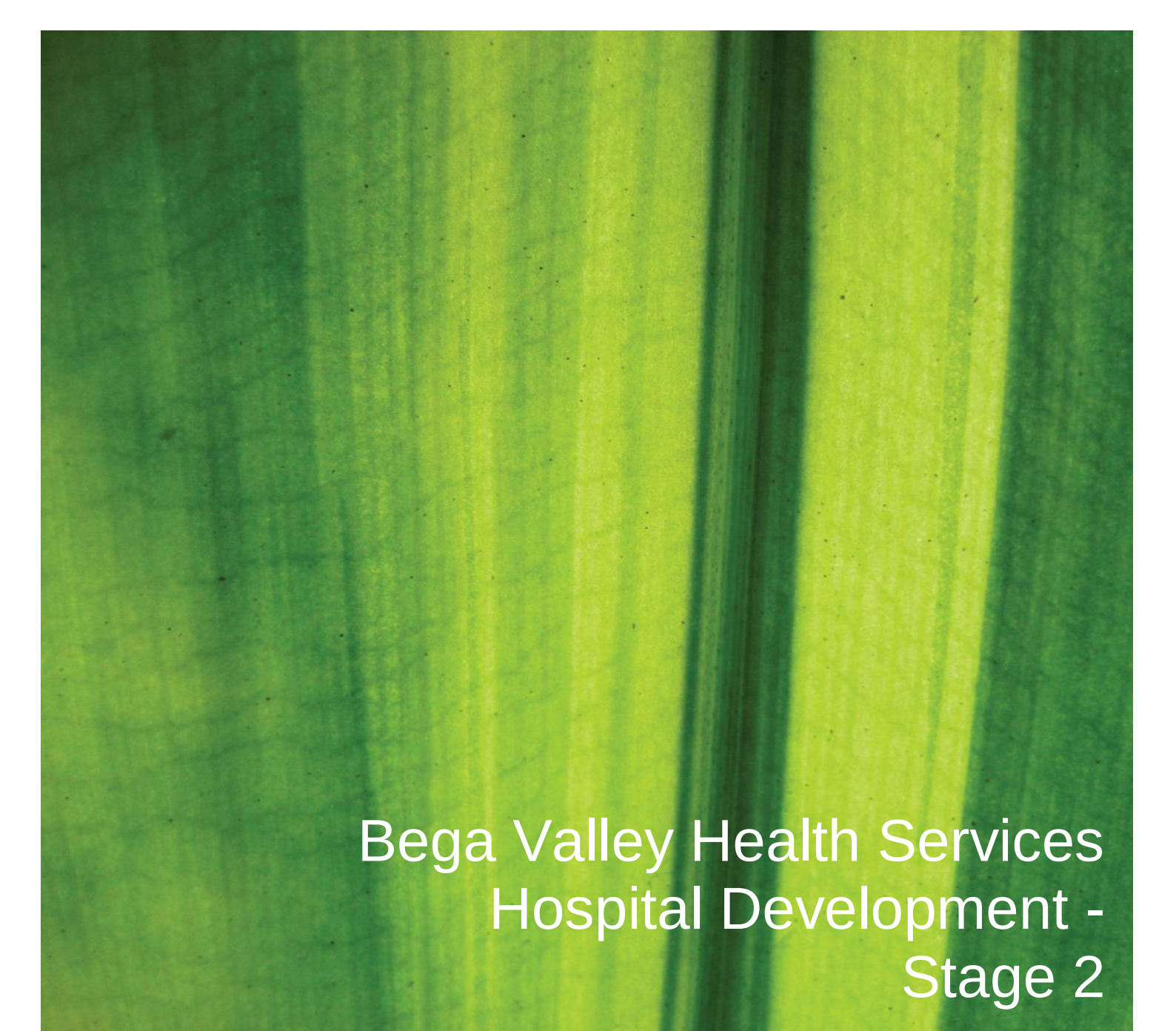




# Bega Valley Health Services Hospital Development - Stage 2

SSD 5307 – 2012: Response to Submissions

May 2013

**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

|                    |                                 |
|--------------------|---------------------------------|
| Director           | Stephen White                   |
| Associate Director | Danielle Pinkerton              |
| Senior Consultant  | Angus Halligan                  |
| Job Code           | SA4723                          |
| Report Number      | Response to Submissions Stage 2 |

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# 1 Introduction

This Response to Submissions Report has been prepared by Urbis Pty Ltd on behalf of the Proponent, NSW Health Infrastructure, to provide a response to the issues raised in the submissions received during the exhibition period of the Stage 2: Detailed Design of the Hospital Building (SSD 5307\_2012) for the proposed Bega Valley Health Services Hospital Development at Tathra Road, Bega.

The Environmental Impact Statement (dated February 2013) was submitted to the NSW Department of Planning and Infrastructure (DOPI) and exhibited between 14 March and 16 April 2013.

This Response to Submissions Report also includes modifications to the Mitigation Measures detailed within the EIS.

Consent was granted for the Stage 1 Application – Concept Approval and Construction Enabling Works (SSD 5307) on 26 March 2013. This report includes a response to the relevant conditions of consent for the Stage 1 approval (Conditions A8 – A24) as requested in the undated letter from the Department of Planning and Infrastructure.

The Response to Submissions Report is structured as follows:

- Chapter 2: Response to Agency Submissions

This Section outlines the Proponent's response to each individual submission from State and Local Government Departments, and Agencies.

- Chapter 3: Response to Public Submissions

This Section outlines the Proponent's response to each the issues raised in the two submissions received from the public.

- Chapter 4: Final Mitigation Measures

Amendments have been made to the Draft Mitigation Measures in response to submissions received.

- Chapter 5: Conclusion

## 2 Response to Agency Submissions

### 2.1 DEPARTMENT OF PLANNING AND INFRASTRUCTURE

**TABLE 1 – DEPARTMENT OF PLANNING AND INFRASTRUCTURE (DOPI) SUBMISSION**

| ISSUE                             | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DOPI                              | Comprehensively address conditions A8-A24 in Part B, Schedule 2 of the development consent issued for the Concept Proposal and Stage 1 works on the site (SSD 5307_2012).                                                                                                                                                                                                                                                                                                                                                                               | Responses to conditions A8 – A24 have been detailed below.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Condition A8 – Building Design    | The building shall attain a maximum height of RL38.80m AHD and shall not be inconsistent with the building envelope illustrated on the approved plans referenced in Condition A8 of Part A Schedule 2.                                                                                                                                                                                                                                                                                                                                                  | The detailed design of the hospital building complies with the maximum height of RL38.80m AHD and has been designed in accordance with the approved concept plans.                                                                                                                                                                                                                                                                                                           |
| Condition A9 – Building Design    | The lower ground level of the building is to be no lower than the determined Probable Maximum Flood (RL 20.50m AHD) unless otherwise determined by the Flood Impact Assessment (refer Condition C19 of Part C2 of Schedule 3 of this consent).                                                                                                                                                                                                                                                                                                          | The lower ground floor of the hospital building has been designed to be no lower than the determined Probable Maximum Flood (RL 20.50m AHD).                                                                                                                                                                                                                                                                                                                                 |
| Condition A10 – Landscape Details | The Stage 2 landscape plan detail should include species indigenous to the area which provide appropriate function (i.e. not a risk to the public from limb fall, or must be able to deliver stormwater quality outcomes) and create the amenity referred to in the Landscape Concept                                                                                                                                                                                                                                                                   | The Stage 2 Landscape Plan has included species indigenous to the area to ensure a high quality landscape response and maximise function and safety for all staff and visitors.                                                                                                                                                                                                                                                                                              |
| Condition A11 – Landscape Details | <p>The final landscape plan for the site is to include the following:</p> <ul style="list-style-type: none"> <li>a) Revegetation of the south-eastern corner of the site. The plan shall make provision for planting to assist in reducing the visual impact of the development and in particular, in reducing any potential impacts from any evening and night time illumination of the development including the outdoor car parking area.</li> <li>b) Habitat Boxes: suitably integration of the habitat boxes into the site landscaping.</li> </ul> | <p>The projects landscape architect (360° Landscape Architects) has prepared amended landscape plans in response to Condition A11 (submitted at <b>Appendix A</b>).</p> <p>The addendum plans detail the revegetation of the south-eastern corner of the site.</p> <p>The landscape scheme submitted with the Stage 2 application had already integrated habitat boxes into the site landscaping and provided 54 locally indigenous trees to offset the loss of habitat.</p> |

| ISSUE                                | COMMENT                                                                                                                                                                                                                                            | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      | c) Trees: At least 54 locally indigenous trees (including River Red Gum <i>Eucalyptus tereticornis</i> ) to offset the loss of habitat trees.                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Condition A12 – Rainwater Harvesting | The Stage 2 application must consider opportunities for the provision of rainwater harvesting. If incorporated into the design, the rainwater harvesting should also be reflected in the MUSIC model developed.                                    | <p>The proposed on-site rainwater harvesting proposed as part of the Stage 2 application is considered to provide an appropriate level of rainwater harvesting for the hospital proposal.</p> <p>An Integrated Water Management Plan is currently being prepared by WSP Consultants for future discussion with BVSC.</p>                                                                                                                                                                                                                                             |
| Condition A13 – Bicycle Facilities   | A separate and specific staff bicycle parking facility must be included in the Stage 2 design. The facility shall be designed with respect to the NSW Planning Guidelines for Walking and Cycling and as referred to in the DGR's for the project. | <p>The final hospital design, in particular the provision of staff bicycle parking, has considered identified demand for the provision of bicycle parking spaces by staff. The number provided is considered to be appropriate for the future operation of the BVHS Hospital with room for expansion should future staff demand warrant.</p> <p>An amended site plan has been prepared by BVN Architects and 360° Landscape Architects outlining the location and design of the staff bicycle parking facility, submitted with this report at <b>Appendix B</b>.</p> |
| Condition A14 – Bus Stop             | The provision of bus access to service the site is to be resolved with the service providers and details incorporated in the Stage 2 DA.                                                                                                           | <p>The final hospital design has been developed in consultation with local bus service providers to ensure access and internal circulation roads are suitable to meet the needs of staff and visitors.</p> <p>An updated site plan indicating the proposed location of the bus stop has been prepared by BVN Architects and is submitted with this report at <b>Appendix B</b>.</p>                                                                                                                                                                                  |
| Condition A15 – Shared User Pathway  | Provision for a shared user path (walking and cycling) along the boundary frontage to Bega-Tathra Road should be suitably resolved with Council and details incorporated into the Stage 2 DA, as appropriate.                                      | <p>Health Infrastructure NSW entered into discussions with BVSC to meet their requirements for the provision of pathways to the hospital site.</p> <p>Council are yet to provide final details of the required pathways (walking/cycling) to access the hospital site. Health Infrastructure NSW is committed to</p>                                                                                                                                                                                                                                                 |

| ISSUE                                            | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | providing pathways in accordance with BVSC requirements. This will be finalised prior to occupation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Condition A16 – Geothermal Energy Storage System | <p>The Stage 2 development application is to include an environmental assessment of the proposed geothermal energy storage system including:</p> <ul style="list-style-type: none"> <li>a) Groundwater Impact Assessment addressing the following: <ul style="list-style-type: none"> <li>i) The potential impacts of construction and operation of the geothermal system on groundwater and groundwater dependent ecosystems and the nearby watercourses and wetlands;</li> <li>ii) Any proposal to intercept groundwater, or use and extract surface water or groundwater during construction and operation;</li> <li>iii) Any potential for the construction and/or operation of the geothermal system to impact on the nearby watercourses and wetlands located on the adjacent Lot 2;</li> <li>iv) Any aquifer interference implications; and</li> <li>v) Any water licensing requirements.</li> </ul> <p>The assessment is to address potential impacts of the proposal on groundwater and groundwater dependent ecosystems and consider the requirements of the NSW Aquifer Interference Policy (2012).</p> </li> <li>b) A Phase 1 Preliminary Contamination Assessment of the site and immediate surround to assess the likelihood for contamination to exist on the site from past and present activities and to make recommendations on the need for further investigations and management, as appropriate. The Assessment is to address the statutory provisions of <i>State Environmental</i></li> </ul> | <p>In response to Condition A16 relating to the Geothermal Energy Storage System, Steensen Varming have reviewed their assessment of the ground source heat pump providing a greater level of detail. The findings of this review have been incorporated into the revised report attached at <b>Appendix C</b>.</p> <p>A Phase 1 Preliminary Contamination Assessment of the site and immediate surrounds has been undertaken and was submitted with the Stage 2 application. This level of assessment is considered applicable with reference to relevant guidelines.</p> |

| ISSUE                                        | COMMENT                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE                                                                                                                                                                                                                                                                                        |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                              | <p><i>Planning Policy No. 55 – Remediation of Land.</i></p> <p>c) Geotechnical Assessment of the site and immediate surround to verify the suitability of the site including surface and subsurface conditions for the construction of the geothermal energy storage system.</p> <p>d) An assessment against any relevant Australian Standards and Guidelines.</p>            | <p>A geotechnical assessment has been prepared by Douglas Partners and accompanies the Stage 2 application taking into consideration the surface and subsurface conditions for all aspects of the proposed development including the geothermal energy storage system.</p>                      |
| Condition A17 – Obstacle Limitation Surfaces | The final design for the geothermal energy storage system shall take into account Obstacle Limitation Surfaces required for the operation of the helipad, in accordance with the recommendations of the Rehbein Airport Consulting report dated 31 August 2012. Flight path protection requirements should be considered where relevant and incorporated into the Stage 2 DA. | The final design of the geothermal energy storage system has taken into account the Obstacle Limitation Surfaces requirements and will fully comply with the recommendations outlined within the Rehbein Airport Consulting Report dated 31 August 2012.                                        |
| Condition A18 – Obstacle Limitation Surfaces | The final design of the eastern wing of the hospital is to take into account the recommendations of the Rehbein Airport Consulting report dated 31 August 2012. In this regard, elements of the building may need to be lit for night helicopter operations.                                                                                                                  | The final design of the eastern wing of the hospital has taken into account the Obstacle Limitation Surfaces requirements and will fully comply with the recommendations outlined within the Rehbein Airport Consulting Report dated 31 August 2012.                                            |
| Condition A19 – Bushfire Requirements        | The design of the hospital building is to comply with the recommendation in Section 4.4 (Services – Waster, Electricity and Gas) and 4.6 (Excavation) of the Bushfire Constraints Report prepared by ABPP dated May 2012                                                                                                                                                      | The final hospital design complies with the recommendation of the Bushfire Constraints report prepared by ABPP dated May 2012.                                                                                                                                                                  |
| Condition A20 – Flood Free Access            | An alternative access route is to be considered as part of the Stage 2 site planning which allows access to the hospital to remain flood free, including in a Probable Maximum Flood event.                                                                                                                                                                                   | <p>Based on our latest information, the hospital will not be isolated during a flood and that a separate evacuation route or additional access to the hospital is not required.</p> <p>A site plan with flood level overlays has been prepared by BVN and is attached at <b>Appendix D.</b></p> |

| ISSUE                                                           | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Condition A21 – Hospital Emergency response and Evacuation Plan | The Stage 2 DA is to include Hospital Emergency (Response and Evacuation) Outline Plan for the site including to take into account various flood scenarios which may restrict or cut-off access to the site, result in inundation of low lying parts of the site and extended periods of isolation. It is recommended that the Plan also consider the transfer of equipment and patients to other hospitals.                                                                                                                        | Based on our latest information and studies undertaken to date, the hospital will not be isolated during a flood and a separate evacuation route or additional access to the hospital is not required. However should the flood study currently being undertaken by Council indicate flooding greater than current flood data, Health Infrastructure will review its access arrangements to ensure safe passage from the hospital.<br><br>A draft emergency response plan will be submitted prior to occupation of the hospital. |
| Condition A22 – Impact on Spur Locations                        | The Stage 2 DA is to minimise potential impacts on the spur landforms on the site. The application should be accompanied by a Cultural Heritage Impact Assessment identifying the impact to the spur locations present on the site and appropriate mitigation measure to ameliorate such impacts.                                                                                                                                                                                                                                   | The final hospital design minimises the potential impacts on the spur landforms as per the Cultural Heritage Impact Assessments submitted with the Stage 2 application.                                                                                                                                                                                                                                                                                                                                                          |
| Condition A23 - Contamination                                   | In accordance with the recommendations in Section 13 of the Preliminary Contamination Assessment date 30 August 2012 prepared by Coffey Environments, the proponent shall comply with the following, as relevant to the future Stage 2 application:<br><br>a) The dumped material at AEC 3 is to be disposed of to a licenced waste disposal facility.<br><br>b) Further sampling and analysis of this area should be undertaken to confirm the absence of contamination in the residual fill or soils beneath the dumped material. | The final hospital has been designed in accordance with Section 13 of the Preliminary Contamination Assessment date 30 August 2012 prepared by Coffey Environments.                                                                                                                                                                                                                                                                                                                                                              |
| Condition A24 – Hazardous Materials                             | The Stage 2 DA is to suitably address the requirements of State Environmental Planning Policy No. 33 – Hazardous and Offensive Development is to include:<br><br>a) Description of the proposed storage, use and management of any                                                                                                                                                                                                                                                                                                  | An assessment against the provisions of State Environmental Planning Policy No. 33 – Hazardous and Offensive Development has been undertaken as part of the Stage 2 application.<br><br>The hospital does not constitute a <i>'potentially hazardous industry'</i> as defined                                                                                                                                                                                                                                                    |

| ISSUE               | COMMENT                                                                                                                                                                    | RESPONSE                                                                                                                                                                                                                                                                                  |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     | <p>hazardous materials; and</p> <p>b) The measures to be implemented to manage hazards and risks associated with storage of hazardous materials.</p>                       | <p>under SEPP 33 due to the thresholds. However, as some medical supplies may constitute hazardous materials, the location, storage and disposal of these materials has been considered within the hazard/risk assessment prepared by SKM and submitted with the Stage 2 application.</p> |
| NSW Office of Water | NSW Office of Water has advised that a licence under Part 5 of the Water Act 1912 will be required with respect to the proposed geothermal ground source heat pump system. | This matter is further discussed in Section 2.4 and Table 3 below in this report.                                                                                                                                                                                                         |

## 2.2 BEGA VALLEY SHIRE COUNCIL

**Table 2** provides the Proponent's responses to the issues raised by the Bega Valley Shire Council in their submission.

**TABLE 2 – BEGA VALLEY SHIRE COUNCIL (BVSC) SUBMISSION**

| ISSUE                                     | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sewer – as per Council's formal response. | <p>Point 11 - Utilities of the Keys Issues of the Department Planning DGRs stated, 'in consultation with the relevant agencies the EIS shall address the existing capacity and any augmentation requirements of the development for the provision of utilities including staging of infrastructure through the preparation of an Infrastructure Management Plan'.</p> <p>A review of the EIS has identified that no Infrastructure Management Plan or any other information addressing the existing capacity of sewer or the proposed capacity of sewer for the proposed hospital has been provided. Council is unable to determine augmentation requirements for the development and therefore unable to adequately assess the impacts on Sewer Utilities by the development.</p> | <p>Health Infrastructure has engaged in discussion with BVSC in relation to the existing and proposed sewer capacity. As a result of these discussions Health Infrastructure are in the process of preparing an Integrated Water Management Plan (prepared by WSP Consultants) which will inform future discussion with BVSC.</p> <p>Details of the proposed Sewer Pump System are attached at <b>Appendix E</b>.</p> |
| Sewer – as per email from BVSC.           | <i>The information required to assess sewer impacts as part of Stage 1 has been slow in being resolved, but as of last week, I believe the applicants are getting the additional information to satisfy Council's</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | An Integrated Water Management Plan is currently being prepared by WSP Consultants for future discussion with BVSC as discussed above.                                                                                                                                                                                                                                                                                |

| ISSUE                                                          | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | RESPONSE                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                | <i>water and sewer section.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                         |
| Water/Rainwater Harvesting - as per Council's formal response. | <p>Council previously provided advice that a detailed design in stage 2 must include significant provision of rainwater harvesting and reuse for appropriate applications within SEHR. This design should also be reflected in the Model for Urban Stormwater Improvement Conceptualisation (MUSIC) model currently developed for the site. No provision for rainwater harvesting has been detailed/included in the stage 2 application. Given the significant roof space, on-site consumption and the DGR's and NSW Health Engineering Services and Sustainable Development Guidelines objectives, it is expected that provision should be made for significant rainwater capture and appropriate reuse.</p> <p>Also, Point 11 - Utilities of the Keys Issues of the Department Planning DGRs stated, "Prepare an Integrated Water Management Plan detailing any proposed alternative water supply, proposed end users of potable and non-potable water, demonstration of water sensitive urban design and water conservation measures".</p> <p>A review of the EIS has identified that no Integrated Water Management Plan or any other information addressing this issue has been provided to suitably assess impacts on Water Utilities.</p> | <p>NSW Health Infrastructure is of the opinion that the level of rain water harvesting proposed for the operation of the BVHS Hospital is appropriate.</p> <p>The final details of which will be contained within the Integrated Water Management Plan currently being prepared by WSP Consultants for future discussion with BVSC.</p> |
| Water Harvesting – as per email from BVSC.                     | <i>As with sewer, I believe this is being resolved and additional information will be provided soon, however, if approval is given then additional detail should be provided detailing where harvested water will be located and stored on-site and how it will be used.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | An Integrated Water Management Plan is currently being prepared by WSP Consultants for future discussion with BVSC as discussed above.                                                                                                                                                                                                  |
| Staff Bicycle Parking - as per Council's formal response.      | Council previously provided advice that the provision of bicycle racks and bicycle storage will be subject to the stage 2 main construction works application. No further details have been provided in the Stage 2 application in respect to adequate staff                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The final hospital design, in particular the provision of staff bicycle parking, has considered identified demand for the provision of bicycle parking spaces by staff. The number provided is considered to be appropriate for the future operation of the                                                                             |

| ISSUE                                                      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                            | bicycle parking facilities meeting the NSW Planning Guidelines for Walking and Cycling. It is considered that details be provided of separate, weather proof, lockable and safe staff bicycle parking on-site also having regard to the Crime Prevention through Environmental Design.                                                                                                                                                                                                      | BVHS Hospital with room for expansion should future staff demand warrant.<br><br>An amended site plan has been prepared by BVN Architects and 360° Landscape Architects outlining the location and design of the staff bicycle parking facility, submitted with this report at <b>Appendix B</b> .                                                                                      |
| Public Bicycle Parking - as per Council's formal response. | The provision of the proposed 10 bike racks have not been located on the site layout plans or floor plans and therefore Council is unable to determine whether they promote the safety of the users and their bicycles (ie in a well-lit area with excellent passive surveillance) and include an open covered roof area to protect bicycles and users from inclement and extreme (e.g. hot) weather.                                                                                       | As identified within the amended site plan prepared by BVN Architects and submitted at <b>Appendix B</b> , it is proposed to provide 10 bike racks for use by the public. This has been located within a well lit area close to the hospital entrance to ensure excellent passive surveillance. The proposed facility will be appropriate shaded to protect from inclement and weather. |
| Car Parking – as per email from BVSC.                      | <i>It is considered that a disabled parking space be provided for the Mental Health parking areas as this facility has its own entrance and is at some distance to proposed disabled parking spaces.</i>                                                                                                                                                                                                                                                                                    | As identified within the amended site plan prepared by BVN Architects and submitted at <b>Appendix B</b> , a disabled parking space has been provided for the Mental Health Parking Area.                                                                                                                                                                                               |
| Security – as per email from BVSC.                         | <i>A security plan should be undertaken for the site. There are a number of building recesses and areas where there may be security concerns. The security plan should detail areas requiring lighting, areas where passive visual surveillance can be achieved and where camera, etc security would be required. I am aware that older hospital sites usually put in brighter lights for security reasons and this sometimes results in lighting impacts on adjoining residences, etc.</i> | In discussion with the assessing officer at the Department of Planning and Infrastructure, ARUP in consultation with Johnstaff (Project Managers), have prepared a description of the security measures proposed for the hospital development, submitted at <b>Appendix F</b> .                                                                                                         |

## 2.3 DEPARTMENT OF PRIMARY INDUSTRIES

**Table 3** provides the Proponent's responses to the issues raised by the Department of Primary Industries (DPI) in their submission. DPI has referred the application to the NSW Office of Water for comment. Matters raised by the NSW Office of Water are addressed below.

**TABLE 3 – DEPARTMENT OF PRIMARY INDUSTRIES**

| ISSUE       | COMMENT                                                                        | RESPONSE                                                                   |
|-------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| Groundwater | The proposed loop heat exchange system is deemed to be an aquifer interference | In response to matter raised by the NSW Office of Water in relation to the |

| ISSUE | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       | <p>activity under the <i>Water Management Act 2000</i>. The is, an activity involving any of the following:</p> <ul style="list-style-type: none"> <li>a) <i>The penetration of an aquifer;</i></li> <li>b) <i>The interference with water in an aquifer;</i></li> <li>c) <i>The obstruction of the flow of water in an aquifer;</i></li> <li>d) <i>The taking of water from an aquifer in the course of carrying our mining, or any activity prescribed by the regulations; or</i></li> <li>e) <i>The disposal of water taken from an aquifer as referred to in paragraph (d).</i></li> </ul> <p>The proposed heat loop exchange system works are likely to constitute an aquifer interference activity as a result of the penetration and possible obstruction and interference aspects of the installation.</p> <p>Relevantly, an aquifer is defined under the <i>Water Management Act 2000</i> as ‘a geological structure or formation, or an artificial landfill, that is permeated with water or is capable of being permeated with water’. That definition does not specifically exclude low permeability units or fractured rocks and therefore triggers the aquifer interference clauses.</p> <p>In lieu of the commencement of aquifer interference approvals, a licence under Part 5 of the <i>Water Act 1912</i> is required to regulate the activity. On the basis of the information provided, it is considered that such an authorisation is warranted. Further to this, the proponent will be required to hold sufficient licenced water entitlement within the relevant water source for ground water interception and/or dewatering that may be required prior to commencement of the activity.</p> <p>As the proposed heat exchange system is a deemed aquifer interference activity, all provisions of the NSW Aquifer Interference Policy apply to that component of the project. It is therefore expected that the</p> | <p>Geothermal Energy Storage System, Steensen Varming have amended their assessment of the ground source heat pump providing a greater level of detail. The amended report has been submitted with this response at <b>Appendix C</b>.</p> <p>Contained within this document is an appendix prepared by Geo Exchange which provides a response to the interaction with the local aquifer and the Ground Heat Exchanger (GHX).</p> <p>The comments of the DPI are otherwise noted.</p> |

| ISSUE | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE |
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|       | <p>installation activities and operation of the scheme will be conducted in accordance with the provisions of the Aquifer Interference Policy.</p> <p>It is apparent from recent studies by the Nebraska Grout Task Force that the integrity of grout used in constructed loop heat exchange systems may be suspect may be suspect. That is, there may be significant opportunity for the contamination of the subsurface from additives used in the heat exchange solution through construction-induced fractures in the casing and in the grout or bentonite seal. In this regard, the geological consultant for the project (Coffey Geotechnics Pty Ltd) has identified a need for initial and ongoing periodic pressure testing of the system to identify the potential for solution leakage, as well as for purpose-built groundwater monitoring bores to identify any effects on groundwater quality.</p> <p>A licence under Part 5 of the <i>Water Act 1912</i> will be required to authorise the construction and operation of the closed loop heat exchange system. Conditions will be placed on that licence that relate to construction of the bores and the ongoing monitoring and reporting of the system to demonstrate that it is not generating adverse impacts on any groundwater system. These are likely to include:</p> <ul style="list-style-type: none"> <li>▪ Geophysical logging of open (for additional strata information) and cased bores (to demonstrate casing and seal integrity).</li> <li>▪ Predictive modelling of thermal impacts on the subsurface for each seasonal circumstance and for all likely operational scenarios.</li> <li>▪ Inclusion of monitoring pipes within the host boreholes to provide the ability to demonstrate the ongoing integrity of grout seals.</li> <li>▪ A testing program identifying the ongoing operational pressure testing of</li> </ul> |          |

| ISSUE         | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|               | <p>the system to demonstrate casing integrity.</p> <ul style="list-style-type: none"> <li>▪ Purpose-built monitoring bore installations external to the host boreholes at agreed locations to demonstrate that any impacts are isolated from the Bega-Brogo Alluvial Groundwater Source.</li> <li>▪ A groundwater monitoring plan detailing agreed schedules, analytical suites and reporting arrangements.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Riparian Land | <p>The Flora and Fauna Assessment report indicated the closest mapped watercourse if location outside Lot 1, 30 – 40 metres north of the planned access road. Section 8.4 of the report suggest that if the watercourse is within 40 metres of any activity such as the construction of a road, it is likely that revegetation along the watercourse with indigenous plant species will be required. The staging Plan show the new road (Hospital Drive) is located outside the site boundary and forms part of the State Significant Development (SSD) Stage 1.</p> <p>The Environmental Impact Statement includes a mitigation measure that <i>any works within 40m of the watercourse north of the proposed access road require a Controlled Activities Approval from the NSW Office of Water.</i></p> <p>The Flora and Fauna Assessment report recommends an enquiry be made with the Office of Water to determine if a Controlled Activity Approval is required. Consultants for the project have also contacted the Office of Water to confirm whether a Controlled Activities Approval is required.</p> <p>The Bega Valley Health Services Development project is a State Significant Development and in accordance with s.89J(1) of the <i>Environmental Planning and Assessment Act</i> an activity approval under s. 91 of the <i>Water Management Act</i> (WM Act) does not apply. While SSD development is excluded from the need for</p> | <p>A response to the matters raised by the NSW Office of Water in regards to the Stormwater Detention Basins has been prepared C&amp;M Consulting Engineers and is submitted with this report at <b>Appendix G</b>. The effect of stormwater quality on the waterways downstream of the development site was considered in the Flora &amp; Fauna Assessment Report by Abel Ecology. Section 8.2.3 of the Abel report states:</p> <p><i>‘existing runoff to the wetlands and consequently to the Bega River is likely to be high in nutrients. Nutrient loaded runoff from the site, after construction of the hospital facility, is likely to decrease’.</i></p> <p>In regards to the proposed stormwater treatment train, <i>‘this will slightly improve the habitat qualities of the wetland’.</i></p> <p>As the proposal is Crown State Significant Development a Controlled Activity Approval is not required as per Section 89J of the <i>Environmental Planning and Assessment Act 1979</i>.</p> |

| ISSUE                       | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RESPONSE                                                                                                                                                                                                                  |
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|                             | <p>a Controlled Activities Approval, if works are proposed near a 'river' as defined under the WM Act, it is recommended a vegetated riparian corridor is established either side of the watercourse to improve bed and bank stability, water quality and the downstream environment, etc.</p> <p>The drainage line to the north of the development is not considered a 'river' as defined in the WM Act. A vegetated riparian corridor is therefore not required to be established along the drainage line to the north of the new access road. It is however to be noted that it is a drainage corridor receiving runoff from the upstream Glen Mia subdivision and should be managed to protect the stability and filtering provided by the existing grassed waterway/drainage line.</p>                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                           |
| Stormwater Detention Basins | <p>The Environmental Impact Statement includes a mitigation measure that the on-site detention systems are proposed to detain storm flows to ensure peak storm flows do not exceed that of the existing site for storm events up to and including a 1 in 2 year storm event, but it does not address why the 1 in 2 year event and not a larger event has been selected as the design storm event.</p> <p>The Office of Water previously requested further justification for the selection of this detention size with respect to downstream quantity impacts in terms of flow velocity and duration. The Office of Water requested the project demonstrate the quantity of water that is discharged from the site will not degrade the downstream watercourse or wetlands and adversely alter the hydrology of the wetlands.</p> <p>It is recommended the project demonstrates the discharge structures for the proposed stormwater detention systems are capable of dealing with flow velocities to minimise impacts on the hydrologic, hydraulic and geomorphic functions of the downstream environment. It is important</p> | <p>A response to the matters raised by the NSW Office of Water in regards to the Stormwater Detention Basins, revised plans have been prepared by C&amp;M Consulting Engineers and are attached at <b>Appendix G</b>.</p> |

| ISSUE                             | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RESPONSE                                                                                                                                                                                                                                                                                                          |
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|                                   | discharge velocities mimic natural flows and do not initiate erosion in the downstream environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                   |
| Flood Report                      | The Flood Report indicates it is essential that the flood levels are confirmed when a comprehensive flood study of the Bega River is undertaken. It is note the flood risk across the site varies significantly and once flooding in the river exceeds the main channel capacity, inundation of the site will occur to varying degrees. It is unclear when the comprehensive flood study is proposed to be prepared and hence the scale of the impact both on-site and off-site and potential mitigating requirements has not been considered. It is recommended a comprehensive flood assessment be undertaken to clearly identify the impact and enable consideration of measures to minimise the potential impacts of the development on hydrologic, hydraulic and geomorphic functions. | As outlined within the C&M response to the matters raised by the NSW Office of Water ( <b>Appendix G</b> ). The proposed development is above the highest estimated PMF level (refer to reports by ARUP and WMA Water). Therefore the development has no impact on flooding or flood flows.                       |
| Recommended Condition of Approval | A licence under Part 5 of the <i>Water Act 1912</i> is to be obtained from the NSW Office of Water for the heat exchange system, and the purpose built monitoring bores necessary to demonstrate the environmental sustainability of the project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | NSW Health Infrastructure acknowledge the requirement to obtain a licence under Part 5 of the <i>Water Act 1912</i> , the conditions of which will be determined through discussion with the NSW Office of Water dependent on the level of risk presented to the aquifer as a result of the heat exchange system. |

## 2.4 ENVIRONMENTAL PROTECTION AUTHORITY NSW

**Table 4** provides the Proponent's responses to the issues raised by the Environmental Protection Authority NSW in their submission.

**TABLE 4 – ENVIRONMENTAL PROTECTION AUTHORITY (EPA) NSW SUBMISSION**

| ISSUE                    | COMMENT                                                                                                                                                                                                                                                                                                  | RESPONSE                                                                                                                                                                                                                                                                                                                                         |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contamination Assessment | <p>The EPA has reviewed the Contamination Assessment and has the following comments:</p> <p>In Table 2: Summary of Potential AECS and COPCS under 'Potential weathering of hazardous materials: Description' it states that 'asbestos fibres may have been transported onto the site from demolished</p> | <p>AEC 5, located 150m east of the site on an adjoining lot is identified on Figure 2 contained within the Contamination Assessment. The risk that <i>asbestos fibres may have been transported onto the site from demolished structures located east of the site</i> is considered to be minimal and given that AEC 5 is not located on the</p> |

| ISSUE                                        | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE                                                                                                                                   |
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|                                              | <p>structures located east of the site', however the site/s of these demolished structures were not mentioned in 5.2 'Surrounding Site Features'. It would be beneficial to include these locations.</p> <p>The EPA suggests that once the fibro fragments (potentially asbestos material) have been moved off site, sampling should be undertaken in the area to ensure there is no risk of contamination.</p>                                                                                                                                                                                                                                                                                                                                                               | <p>subject site, the need to ensure there is risk of contamination is not considered to be warranted.</p>                                  |
| Environmental Noise Impact Assessment (ENIA) | <p>The EPA has reviewed the Environmental Noise Impact Assessment and has the following comments:</p> <p>Further clarification should be provided to:</p> <ul style="list-style-type: none"> <li>▪ The location and height of noise sources on site.</li> <li>▪ Justification for the selected mitigation measures.</li> <li>▪ Percentage of time the equipment operates during the proposed construction hours.</li> <li>▪ Whether there are any concurrent construction works in the vicinity that may contribute additional noise.</li> </ul>                                                                                                                                                                                                                              | <p>A detailed technical response to each of these issues has been prepared by SLR and is attached at <b>Appendix H</b>.</p>                |
| Groundwater Assessment                       | <p>The EPA has reviewed the Groundwater Assessment and has the following comments:</p> <p>Runoff from site will flow into the wetlands and the Bega River as the topography of the area slopes towards the east of the site. The Bega River alluvial aquifer receives recharge predominantly from the flow in the Bega River and groundwater quality is affected by the quality of the water in the river. Therefore, it is particularly important during the construction phase that adequate control measures are implemented to reduce/divert runoff into the wetlands and Bega River.</p> <p>It would be beneficial to please provide clear information on all control measures to be employed during construction to reduce runoff and pollution of the nearby water</p> | <p>A detailed technical response to each of these issues has been prepared by Coffey Geotechnics and is attached at <b>Appendix I</b>.</p> |

| ISSUE                                                                  | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE                                                                                                                                             |
|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                        | <p>bodies. This should be included the type of control measures, as well as maps and diagrams showing the location and number of control measures to be implemented.</p> <p>In addition, there are conflicting statements provided about the distance of the wetlands from the eastern site boundary that should be rectified:</p> <ul style="list-style-type: none"> <li>▪ 9.2 'NSW Rivers and Estuary Policy (1996)' – 'The proposed development is to be located ... approximately 250m west of the existing wetlands'.</li> <li>▪ 9.3 'NSW Groundwater Policy Framework Document (1997)' – 'Based on aerial photography the closest wetlands appear to be approximately 100m east of the site.</li> </ul> |                                                                                                                                                      |
| Soil and Sediment Control Plan (Soil and Water Management Plan (SWMP)) | <p>The EPA has reviewed the Soil and Sediment Control Plan and has the following comments:</p> <p>Further information needs to be provided on all sediment control protection measures. This information must include the type of control measures, as well as maps and diagrams and showing the location and number of control measure to be implemented.</p> <p>In addition to this, information on dust control measures has not been included and needs to be provided.</p>                                                                                                                                                                                                                               | C&M Consulting Engineers have revised the Soil and Water Management Plan (submitted at <b>Appendix J</b> ) to address the matters raised by the EPA. |

## 2.5 ROADS AND MARITIME SERVICES

The application was referred to the Roads and Maritime Services on the 12 March 2013. In a response dated 12 April 2013,

*'RMS has reviewed the submitted information and does not object to the development proposal in principle subject to fulfilment of the conditions of the Development Consent dated 26 March 2013 relating to the subject application number SSD 5307 prior to occupation'.*

No further response is required from the proponent at this time.

## 2.6 TRANSPORT FOR NSW

The application was referred to the Transport for NSW on the 12 March 2013. In a response dated 29 April 2013,

*'Transport for NSW does not have any additional comments to provide on this document, at this time. We look forward to continued collaboration through-out the remaining stage of development.'*

No further response is required from the proponent at this time.

## 2.7 HERITAGE COUNCIL OF NSW

**Table 5** provides the Proponent's responses to the issues raised by the Heritage Council submission.

**TABLE 5 – HERITAGE COUNCIL OF NSW SUBMISSION**

| ISSUE                      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | RESPONSE                                                                                                                                                      |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Historic Archaeology       | <p>It is noted that, in response to Heritage Branch recommendations that the Department of Planning and Infrastructure seek clarification as to whether the proposed development site has any potential for historic archaeology, further consultation has taken place with the Heritage Consultants for the project. The consultant, RPS, have indicated that the site has low to nil potential for historic archaeology. The Branch recommends that the following condition of consent for inclusion in any approval of the proposed scheme:</p> <p><i>The Applicant must ensure that if historic archaeological deposits/relics are discovered, the Heritage Council must be notified in writing in accordance with Section 146 of the Heritage Act. Work must cease in the affected area(s) and a suitability qualified and experienced archaeologist must be contacted to assess the archaeological material. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.</i></p> | RPS Heritage Consults have addressed the matters raised by the Heritage Council of NSW within a statement submitted with this response at <b>Appendix K</b> . |
| Aboriginal Heritage Impact | The Branch also notes that an Aboriginal Heritage Impact Assessment has been undertaken by RPS. It is understood by the Heritage Branch that the proposal has also been referred to the appropriate to the section of the Office Environment and Heritage for assessment of Aboriginal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | RPS Heritage Consults have addressed the matters raised by the Heritage Council of NSW within a statement submitted with this response at <b>Appendix K</b> . |

| ISSUE | COMMENT                                                                                                                                                                                                                                                                                 | RESPONSE |
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|       | <p>Cultural issues.</p> <p>It is recommended that the department of Planning and Infrastructure seek clarification as to whether the proposed design scheme will impact upon any heritage items in the vicinity of the site especially in relation to any potential visual impacts.</p> |          |

## 2.8 NSW RURAL FIRE SERVICE

The application was referred to the NSW Rural Fire Service on the 12 March 2013. In a response dated 18 March 2013,

*‘The NSW Rural Fire Service has reviewed the plans and documents received for the proposal and subsequently raise no concerns or issues in relation to bush fire.*

No further response is required from the proponent at this time.

### 3 Response to Public Submissions

Tables 6 and 7 provide the Proponent's responses to the issues raised in the 2 anonymous public submissions.

**TABLE 6 – PUBLIC SUBMISSION ONE**

| ISSUE                   | COMMENT                                                               | RESPONSE                                                                                                                                                                                                                          |
|-------------------------|-----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site selection          | Site selection is perceived to be remote from the general population. | The proposed site was selected in consultation with the various key stakeholders. The final choice of location of the site at Tathra Road, Bega has been assessed as part of the Stage 1 application and found to be appropriate. |
| Access/Public Transport | Perceived lack of public transport and reliance on private vehicles.  | The proposed hospital will be appropriately serviced by local bus service providers to ensure the site can be suitably access by the public reliant on public transportation.                                                     |

**TABLE 7 – PUBLIC SUBMISSION TWO**

| ISSUE             | COMMENT                                                                            | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Flood Study       | To date there has been no comprehensive flood study.                               | <p>The proposed development is above the highest estimated PMF level (refer to reports by ARUP and WMA Water). Therefore the development has no impact on flooding or flood flows.</p> <p>This matter is discussed in more detail in the addendum prepared by C&amp;M attached at <b>Appendix G</b>.</p>                                                                                                                                                                                                                                                                                     |
| On-Site Detention | Further consideration of on-site detention in terms of the protection of wetlands. | <p>The effect of stormwater quality on the waterways downstream of the development site was considered in the Flora &amp; Fauna Assessment Report by Abel Ecology. Section 8.2.3 of the Abel report states that:</p> <p><i>'existing runoff to the wetlands and consequently to the Bega River is likely to be high in nutrients. Nutrient loaded runoff from the site, after construction of the hospital facility, is likely to decrease'.</i></p> <p>In regards to the proposed stormwater treatment train, <i>'this will slightly improve the habitat qualities of the wetland'.</i></p> |
| Flight Path       | Site Selection.                                                                    | The proposed site was selected in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| ISSUE           | COMMENT                 | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                         | consultation with the various key stakeholders. The final choice of location of the site at Tathra Road, Bega has been assessed as part of the Stage 1 application and found to appropriate. The location of the helipad and flight paths were assessed as part of the Stage 1 application and found to be appropriate.                                                                       |
| Inconsistencies | Report inconsistencies. | The Stage 2 application has been prepared in with multiple inputs from a number of expert consultants. Where there are any inconsistencies between preliminary documentation outlined during community consultation and the current application (including support technical documentation), the current information lodged with the Stage 2 application supersedes all previous information. |

## 4 Final Mitigation Measures

This Section of the Report provides the original Mitigation Measures that were provided within Section 12 of the EIS and any updated Mitigation Measures as a result of the public exhibition and submissions. Proposed deletion to the original Mitigation Measures are shown as **bold strike through**. Any amendments or new additions are shown as **bold italics**.

TABLE 8 – MITIGATION MEASURES

| KEY ISSUE                    | MITIGATION MEASURE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Prior to Construction</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Flora and Fauna              | <ul style="list-style-type: none"> <li>▪ Tree Protection: <ul style="list-style-type: none"> <li>– Before any site works commence tree exclusion fencing must be installed around all trees to be retained.</li> </ul> </li> <li>▪ Habitat enhancement and removal of tree with hollows: <ul style="list-style-type: none"> <li>– All hollow-bearing trees must be removed after the exclusion fencing has been installed and before any other earth works commence.</li> <li>– Two weeks prior to tree removal we recommend that four nest/roosting boxes be installed for each tree or stag containing hollows to be removed. Two of the boxes must be suitable for birds or arboreal mammals and two for microbats.</li> <li>– An ecologist must inspect and be present during the tree removal process to protect any fauna inhabiting the hollows.</li> </ul> </li> <li>▪ Indigenous species for landscape plantings: <ul style="list-style-type: none"> <li>– The following is a list of suitable species.</li> <li>– Trees and Small Trees: <i>Angophora floribunda</i>, <i>Eucalyptus tereticornis</i>, <i>Allocasuarina littoralis</i>.</li> <li>– Herbs and Grasses: <i>Dichondra repens</i>, <i>Lomandra longifolia</i>, <i>Poa labillardierei</i>, <i>Themeda australis</i>.</li> </ul> </li> <li>▪ <del>Any works within 40 m of the watercourse north of the proposed access road require a Controlled Activities Approval from the NSW Office of Water.</del></li> <li>▪ Erosion and sediment control structures are to be installed prior to any earthworks commencing and cleared after any storm event. <b><i>They are to remain in place for the duration of construction.</i></b></li> </ul> |
| Heritage                     | <p><i>The proponent will develop a Cultural Heritage Management Plan before on site excavation or construction activity begins that takes into account the following:</i></p> <ul style="list-style-type: none"> <li>- <i>Salvage and/or management of AHIMS site# 62-6-0724;</i></li> <li>- <i>Test pitting of Spur 1 &amp; 2 landforms where impact is to occur under OEH Code of Practice methodology guidelines (September 2010);</i></li> <li>- <i>Opportunity for monitoring by BLALC during trenching and other related construction works to the spur landform;</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| KEY ISSUE | MITIGATION MEASURE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|           | <ul style="list-style-type: none"> <li>- Mechanism for ongoing Aboriginal cultural input into the proposed hospital development; and</li> <li>- Should the proposed hospital plan change, it should identify if impact to spur landforms will increase and if so appropriate mitigation measures be put in place to ameliorate these.</li> </ul> <p>All relevant staff, i.e. contractors and subcontractors, will made aware of their statutory obligations for heritage under NSW National Parks and Wildlife Act (1974) and the NSW Heritage Act (1977).</p> <p>If, during the course of development works, suspected European cultural heritage material is uncovered, work should cease in that area immediately. The OEH Enviroline 131 555 should be contacted and works only recommence when an appropriate and approved management strategy instigated.</p>                                                                                                                                                                                                                                                                                                                                                                                                         |
| Bushfire  | <ul style="list-style-type: none"> <li>▪ A need to provide adequate internal access for emergency service vehicles including Fire and Rescue NSW and NSW Rural Fire Service Appliances.</li> <li>▪ <del>The proposed Hospital site is to be located more than 100 metres from the Category 2 Bushfire Prone Vegetation which is mapped as being located adjacent to the watercourse located within the central north-eastern portion of the development site within proposed Lot 2. This separation width removes the need to apply bushfire construction standards to the proposed Hospital buildings/assets are required by A.S. 3959 – 2009.</del></li> <li>▪ Fire Hydrant spacing, sizing and pressures of mains shall comply with A.S. 2419.1 – 2005.</li> <li>▪ The proposed Hospital site is unlikely to come under bushfire attack and therefore not requirement exists for the preparation of a specific Evacuation Plan that addresses a bushfire emergency. However, there shall be prepared an Evacuation Plan which establishes the relevant protocols for the management of other specific emergencies including a fire in a building; severe storm and storm damage; hazardous material incident within the Hospital or on surrounding land, etc.</li> </ul> |
| Flooding  | <ul style="list-style-type: none"> <li>▪ Critical electrical infrastructure such as backup generators, will be stored at a minimum above the 500 year ARI flood level (preferably the PMF). Backup generators should also be designed to operate for up to several weeks (that is, sufficient fuel, etc).</li> <li>▪ A Hospital Emergency Management (Response and Evacuation) Plan will be in place and ensure that it accounts for several possible scenarios during a flood, including restricted or cut-off access due to flood waters, inundation of low lying parts of the site and extended periods of isolation. It will also consider the transfer of equipment and patients to other hospitals.</li> <li>▪ The minimum floor level of the new hospital building will be raised to the PMF, including wards, operating theatres and the Emergency Department, and non-essential services/area, such as car parks and recreation areas, should be located in</li> </ul>                                                                                                                                                                                                                                                                                             |

| KEY ISSUE                  | MITIGATION MEASURE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|                            | <p>the lower lying areas of the property below the PMF.</p> <ul style="list-style-type: none"> <li>▪ The PMF should be adopted as the flood planning level of the site. If this is not possible, the development should be located at as high an elevation as possible with a minimum requirement to be above the 1000 year ARI maximum flood level. In such circumstances the hospital should be protected up to the PMF level. Initial review of the site contours suggests that such protection would be achievable.</li> <li>▪ A further allowance on top of the 1000 year ARI or PMF event flood levels for climate change is not considered necessary at this stage, due to the extreme and uncertain nature of these events. However, this approach should be discussed with relevant representatives from OEH and re-visited following a detailed flood risk analysis.</li> <li>▪ An access route should be available to the hospital which will remain free of flooding, including during a PMF event.</li> <li>▪ There are no current flood risk management requirements relating to off-site impacts for land above the 100 year ARI maximum flood level.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>During Construction</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Noise and Vibration        | <ul style="list-style-type: none"> <li>▪ <i>Use of localised acoustic hoarding and/or earth bunds around significantly noise generating items of plant (eg rock breaker), where practicable. This would be expected to provide between 5 dB and 10 dB of additional noise attenuation, if adequately constructed to ensure line of sight between all receivers and the construction equipment is broken.</i></li> <li>▪ <i>Briefing of the work team in order to create awareness of the locality of sensitive receivers and the importance of minimising noise emissions.</i></li> <li>▪ <i>Ensuring any spoil is placed and not dropped into awaiting trucks.</i></li> <li>▪ <i>Establishing load points as far as practicable from sensitive receivers.</i></li> <li>▪ <i>Use of less noise-intensive equipment, where reasonable and feasible.</i></li> <li>▪ <i>Non-tonal reversing alarms fitted on construction vehicles.</i></li> </ul> <p>In order to minimise the potential noise and vibration impacts upon nearby sensitive receivers, most construction works are proposed to be undertaken during the OEH's standard daytime construction periods (7.00 am to 6.00 pm Monday to Friday and 8.00 am to 1.00 pm on Saturdays).</p> <p>Prior to construction, when more specific information is available in relation to the proposed construction works, a site specific Construction Noise and Vibration Management Plan (CNVMP) would be prepared.</p> <ul style="list-style-type: none"> <li>▪ It is envisaged that the mechanical plant noise sources will be controllable by common engineering methods that may consist of judicious location, barriers, silencers and/or acoustically lined ductwork noting that the cumulative noise emissions from all hospital noise sources should be considered when determining appropriate mitigation options.</li> </ul> |

| KEY ISSUE                           | MITIGATION MEASURE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | <ul style="list-style-type: none"> <li>The noise predictions for the specified car parking use (including ambulance arrivals) show no exceedance of the operational noise goals at the nearby representative residential receiver locations.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Transport and Accessibility         | <p>Traffic, access, servicing and layout arrangement are to be in accordance with the Transport Assessment prepared by SKM.</p> <p>A Construction Traffic Management Plan is to be prepared prior to construction.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Drainage                            | <ul style="list-style-type: none"> <li><i>A pipe network system to collect minor storm runoff from surface areas which will minimise nuisance flooding.</i></li> <li><i>On-site stormwater detention system(s) to detain storm flows so that they can be slowly released over time to ensure that peak storm flows do not exceed that of the existing site for storm events up to and including a 1 in 2 year storm event. This will assist with maintaining environmental flows and reduce the likelihood of scouring and instability within downstream waterways.</i></li> <li><i>Bio-retention basins (constructed within the on-site stormwater detention basins) to provide significant water quality treatment to runoff from impervious areas while at the same time providing additional stormwater detention.</i></li> <li><i>Stormwater Quality Improvement Devices (SQIDs) including hydrodynamic separation via Vortex Device(s) or equal to provide water quality treatment to runoff from road and car park areas by removing sediment, oils and hydrocarbons.</i></li> <li><i>Vegetated swales or bio swales to convey storm flows from car park areas while providing water quality treatment via filtration.</i></li> <li><i>Overland flow paths (such as roads and swales) to carry major storms through the site without causing damage to property from flooding.</i></li> </ul> |
| Sediment, Erosion and Dust Controls | <ul style="list-style-type: none"> <li><i>Bio-retention basins (constructed within the on-site stormwater detention basins) to provide significant water quality treatment to runoff from impervious areas while at the same time providing additional stormwater detention.</i></li> <li><i>Stormwater Quality Improvement Devices (SQIDs) including hydrodynamic separation via Vortex Device(s) or equal to provide water quality treatment to runoff from road and car park areas by removing sediment, oils and hydrocarbons.</i></li> <li><i>Vegetated swales or bio swales to convey storm flows from car park areas while providing water quality treatment via filtration.</i></li> <li><b>Clearly visible barrier fencing shall be installed at the discretion of the site superintendent to ensure traffic control and prohibit unnecessary site disturbance. Vehicular access to the site shall be limited to only that essential for construction work and shall enter the site only through the stabilised access points.</b></li> </ul>                                                                                                                                                                                                                                                                                                                                               |

| KEY ISSUE                     | MITIGATION MEASURE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                               | <ul style="list-style-type: none"> <li>▪ <i>All disturbed areas are to be stabilised within 14 working days of the completion of land shaping. All disturbed areas are to be protected so that the land is permanently stabilised within six months. Topsoil shall be respread over the site, other than re-grading areas, to a minimum depth of 100mm on bare but tyned soil surfaces and the site shall be revegetated.</i></li> <li>▪ <i>Proprietary silt fencing shall be installed by the Contractor in accordance with their approved Sediment and Erosion Control Plan and elsewhere at the discretion of the site superintendent to contain coarser sediment fractions as near as possible to their source.</i></li> <li>▪ <i>Sediment removed from any trapping device shall be relocated where further pollution to downslope lands and waterways cannot occur.</i></li> <li>▪ <i>Stockpiles shall be located by the Contractor in accordance with their approved Sediment and Erosion Control Plan and elsewhere at the discretion of the Project Manager and/or Superintendent. Where stockpiles are to be in place longer than 30 days they shall be stabilised by covering with mulch or with temporary vegetation.</i></li> <li>▪ <i>Water shall be prevented from entering the permanent drainage system unless it is sediment free. Drainage pits are to be protected in accordance with the Contractor's approved Sediment and Erosion Control Plan.</i></li> <li>▪ <i>Temporary sediment traps at pits shall be retained until after lands they are protecting are completely rehabilitated.</i></li> <li>▪ <i>Waste bins are to be provided for all construction refuse. They are to be emptied at least weekly and refuse is to be disposed in accordance with the site manager's recommendations.</i></li> <li>▪ <i>Prior to construction, the Contractor shall prepare an Environmental Management Plan (EMP).</i></li> </ul> |
| Servicing and Waste           | Before commencement of works on site, a Construction Waste Management Plan will be prepared to outline the exact procedures during construction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Groundwater and Surface Water | It is recommended by Coffey that groundwater monitoring be undertaken prior to and during construction activities associated with the proposed development. Such monitoring should be conducted on a regular basis in order to assess any potential impacts on groundwater and document findings should it be requested by any government agencies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

## 5 Conclusion

This report and appendices for the Stage 2 Response to Submission has addressed the issues raised within each submission during the public exhibition process for Bega Valley Health Services Development – Stage 2 Main Construction Works. This document should be read in conjunction with the Environmental Impact Statement which demonstrates that the proposed development will be appropriately mitigated and designed to have minimal adverse environmental impacts.

In light of the benefits of the proposed development and the absence of any adverse environmental impacts, we have no hesitation in recommending approval for the Stage 2 Main Hospital Construction Works for the proposed Bega Valley Health Services Hospital Development at Tathra Road, Bega.

# Disclaimer

This report is dated May 2013 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (Urbis) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of NSW Health Infrastructure (Instructing Party) for the purpose of BVHS Redevelopment (Purpose) and not for any other purpose or use. Urbis expressly disclaims any liability to the Instructing Party who relies or purports to rely on this report for any purpose other than the Purpose and to any party other than the Instructing Party who relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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## Appendix A

## Amended Landscape Site Plan

## Appendix B

## Amended Architectural Site Plan

## Appendix C

## Geothermal Energy Storage System Assessment

## Appendix D

## Site Plan with Flood Level Overlay

## Appendix E

## Sewer Pump System

## Appendix F

## Security Measures

## Appendix G

## Stormwater/Riparian Lands Statement

## Appendix H

## Environmental Noise Impact Response

## Appendix I

## Groundwater Statement

## Appendix J

## Soil and Water Management Plan

## Appendix K

## Heritage Statement

**Sydney**

Tower 2, Level 23, Darling Park  
201 Sussex Street Sydney, NSW 2000  
**t** +02 8233 9900  
**f** +02 8233 9966

**Melbourne**

Level 12, 120 Collins Street  
Melbourne, VIC 3000  
**t** +03 8663 4888  
**f** +03 8663 4999

**Brisbane**

Level 7, 123 Albert Street  
Brisbane, QLD 4000  
**t** +07 3007 3800  
**f** +07 3007 3811

**Perth**

Level 1, 55 St Georges Terrace  
Perth, WA 6000  
**t** +08 9346 0500  
**f** +08 9221 1779

Australia • Asia • Middle East  
**w** [urbis.com.au](http://urbis.com.au) **e** [info@urbis.com.au](mailto:info@urbis.com.au)