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SSD-9838218 – GRIFFITH BASE HOSPITAL

Section 4.55(1A) Modification Report

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Peter Strudwick
Consultant	Georgia McKenzie
Project Code	P0045404
Report Number	Final – 17 August 2023

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CONTENTS

Executive Summary	4
Project Background.....	4
Proposed Modifications.....	4
Engagement.....	4
Justification of Modified Project	4
1. Introduction	6
1.1. Applicant Details	6
1.2. Project Background.....	6
1.3. Project Overview	6
1.3.1. Analysis of Feasible Alternatives.....	6
1.3.2. Key Features of Site and Surrounds	7
Surrounding Context	7
2. Description of Modifications	8
2.1. Overview	8
2.1.1. Design Development	8
2.1.2. Tree Removal	12
2.1.3. Fire Booster Hardstand	12
2.2. Proposed Amendments to Conditions of Consent.....	12
3. Statutory Context	14
3.1. Statutory Requirements	14
3.2. Mandatory Considerations	14
3.3. Statutory Compliance.....	16
4. Engagement	19
5. Assessment of Impacts	20
5.1. Built Form and Design	20
5.2. Tree Removal	20
5.3. Building Code of Australia Compliance	20
5.4. Acoustic	21
5.5. Ecologically Sustainable Development.....	21
6. Justification of Modified Project	22
6.1. Minimal Environmental Impact.....	22
6.2. Substantially the Same Development.....	22
6.3. Suitability of the Site	22
6.4. Public Interest	22
6.5. Conclusion	23
Disclaimer	24
Appendix A Architectural Plans and Design Statement	
Appendix B Arborist Statement	
Appendix C BCA Compliance Statement	
Appendix D Acoustic Statement	
Appendix E ESD Statement	

FIGURES

Figure 1 – Aerial Photo of Site.....	7
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TABLES

Table 1 Applicant Details 6

Table 2 Proposed Numerical Changes..... 8

Table 3 Proposed Design Modifications 9

Table 4 Identification of Statutory Requirements for the Project..... 14

Table 5 Mandatory Considerations..... 14

Table 6 Statutory Compliance Table 16

EXECUTIVE SUMMARY

This Modification Report has been prepared by Urbis Pty Ltd on behalf of ADCO Constructions Pty Ltd (**ADCO**) (**the Applicant**) pursuant to Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**). The application seeks to modify the approval of SSD-9838218 for the redevelopment of the Griffith Base Hospital at 5-39 Animoo Avenue, Griffith.

Project Background

SSD-9838218 was approved in October 2021 for the *construction of a new four-storey hospital building, demolition of remaining buildings vacated after commissioning of the new hospital, site works including roads and on-grade car parking, landscaping and signage.*

Construction has commenced on the site in accordance with SSD-9838218.

Proposed Modifications

This modification application seeks consent for the following:

- Revised plans that detail the design development changes to the services plant areas of the building, the façade articulation and fenestration details.
- The removal of a Eucalyptus tree (tree 170), which was impacted by a storm on the site on 31 October 2022.
- Construction of a 14m long x 6m wide concrete hardstand adjacent to the existing fire booster at the Noorebar Avenue entrance (to the north-west of the site) for use by fire brigade trucks. This is to meet hydraulic engineer requirements and to comply with the National Construction Code.

Engagement

The Project Team contacted Griffith City Council on 8 May 2023, seeking approval for the construction of the fire brigade hardstand on Council's land.

Griffith City Council confirmed on 30 May 2023 via email that Council has no objection to the proposed hardstand location in front of the sprinkler tank and pump room to the north-west of the site. Council also noted that the proposed hardstand is partially on the road reserve. Council is willing to accept this location, without imposing any licence or lease due to the nature of the proposed development and use associated with Emergency Services.

The Applicant will continue to engage with Council through the exhibition process of this modification application.

Justification of Modified Project

- **Minimal environmental impact:** As outlined in Section 4 of this report, the proposed modifications will not create any acoustic impacts, continues to meet the requirements of the BCA and NCC, and meet the relevant ecologically sustainable development requirements. The Design Statement prepared by DJRD (**Appendix A**) confirms that the proposed design changes will have no impact on the overall architectural quality and aesthetic of the development.
- **Substantially the same development:** The modified development does not propose any changes to the approved land use or gross floor area on site. The proposed development is materially the same scale as that approved, but also the same function and intensity of use as that approved within SSD-9838218.
- **Suitability of the site:** The modified proposal is permissible in the R1 General Residential zone pursuant to the Griffith Local Environmental Plan 2014. The modified proposal is consistent with the objectives of the zone as it will deliver significant investment in and the construction of critical infrastructure, add to the creation of construction related and long-term operational jobs and will improve health facilities and services for the community of the Riverina-Murray region.
- **Public interest:** the modifications are necessary to continuing construction on this key site in Griffith. The modifications also allow the construction of the hardstand adjacent to the fire booster hydrant for fire brigade trucks, as required by the National Construction Code.

Based on the content contained throughout this report and the accompanying appendices, it is considered that the proposed modifications to SSD-9838218 will result in substantially the same development as originally approved and therefore should be approved, subject to the implementation of appropriate conditions.

1. INTRODUCTION

This Modification Report has been prepared by Urbis Pty Ltd on behalf of ADCO Constructions Pty Ltd (**ADCO**) (**the Applicant**) pursuant to Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. The application seeks to modify the approval of SSD-9838218 for the redevelopment of the Griffith Base Hospital at 5-39 Animoo Avenue, Griffith.

1.1. APPLICANT DETAILS

The applicant details for the proposed modification are listed in the following table.

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	ADCO Constructions Pty Ltd
Postal Address	Level 2, 7-9 West Street, North Sydney NSW 2060
ABN	46 001 044 391
Nominated Contact	Kelsey Godwin-Smith

1.2. PROJECT BACKGROUND

SSD-9838218 was approved in October 2021 for the *construction of a new four-storey hospital building, demolition of remaining buildings vacated after commissioning of the new hospital, site works including roads and on-grade car parking, landscaping and signage.*

Construction has commenced on the site in accordance with SSD-9838218.

1.3. PROJECT OVERVIEW

Since the commencement of construction on the site, the project team have identified a range of modifications required:

- Following consultation with the mechanical and hydraulics engineers, minor design development changes are required, mostly relating to the services plant areas and the façade articulation and fenestration details of the approved main hospital building.
- Following a major storm event at the site in October 2022, a Eucalyptus tree (tree 170) was damaged and has been removed. This modification applications seeks to reflect the removal of this tree.
- Construction of a 14m long x 6m wide concrete hardstand adjacent to the existing fire booster at the Noorebar Avenue entrance (to the north-west of the site) for use by fire brigade trucks. The concrete hardstand is required in order to comply with the National Construction Code.

1.3.1. Analysis of Feasible Alternatives

The Applicant has identified two project alternatives in respect to the delivery of the Griffith Base Hospital. These options are discussed below.

Do Nothing

The 'do nothing' approach to continue construction with the approved plans was discounted, as the proposed modifications are necessary to meet hydraulic and mechanical engineer requirements, as well as the statutory requirements of the National Construction Code.

Lodge Modification Application

The SSDA modification allows for the construction of the concrete hardstand adjacent to the fire booster hydrant for fire brigade trucks, as required by the National Construction Code. The design modifications are

required following further detailed design by the mechanical and hydraulics engineers. DJRD Architects confirm the proposed design amendments preserve the design's built form, urban design and design quality. In summary, the modifications are necessary to facilitate to continued project delivery and continuing construction on this key health facility in Griffith.

1.3.2. Key Features of Site and Surrounds

The site is located at 5-39 Animoo Avenue, Griffith, also referred to as 1 Noorebar Avenue. The site is legally described as Lot 2 in Deposited Plan 1043580 and has an area of approximately 6.4 hectares. In accordance with SSD-9838218, construction has commenced on the site for the Griffith Base Hospital redevelopment, as shown in the aerial photo below.

This modification application also seeks consent for the construction of a hardstand at the Noorebar Avenue entrance (to the north west of the site), which is Griffith City Council land. It is noted that this road reserve is not allocated a Lot and Deposited Plan reference. As confirmed by Council, the nearest Lot and DP to this portion of land is Lot 2 in Deposited Plan 1043580. The indicative location of the proposed hardstand is indicated in a blue circle in the figure below.

Figure 1 – Aerial Photo of Site



Source: Urbis

Surrounding Context

- **North:** Low density residential housing. Further to the north, approximately 3km from the site, is Griffith City Airport which provides daily flights to Melbourne and Sydney.
- **East:** St Patricks Catholic Primary School, Sacred Heart Church and Griffith North Public School.
- **South:** Immediately to the south is low density residential housing, interspersed with other land uses including a childcare centre, two churches, Laverty Pathology and the Griffith Blood Donor Centre. Approximately 700m south of the site is Banna Avenue, the main street of Griffith. The main street comprises a mix of retail and commercial developments.
- **West:** West of the site is primarily low-density residential housing. At the westernmost edge of the City Centre is Griffith Regional University Study Centre which is located on the TAFE NSW Riverina Institute Griffith Campus.

2. DESCRIPTION OF MODIFICATIONS

This section of the report describes the proposed modifications, including the project description and relevant conditions. It includes a comparative analysis of the original development and the proposed modifications, justifying the lodgement of the application in accordance with Section 4.55(1A) of the EP&A Act.

2.1. OVERVIEW

This modification application seeks consent for the following:

- Revised plans that detail the design development changes to the services plant areas of the building, the façade articulation and fenestration details.
- The removal of a Eucalyptus tree (tree 170), which was impacted by a storm on the site in October 2022.
- Construction of a concrete hardstand adjacent to the existing fire booster at the Noorebar Avenue entrance (to the north-west of the site) for use by fire brigade trucks. This is to meet hydraulic engineer requirements and to comply with the National Construction Code.

A comparative analysis has been undertaken of the proposed changes to the approved development in **Table 2** and is in accordance with the relevant criteria listed in the *DPE State Significant Development Guidelines – preparing a modification report*.

Table 2 Proposed Numerical Changes

Element	Approved SSD-9838218	Proposed Modification
Project area	64,023m ²	No change proposed
Land use	Hospital	No change proposed
Building height	22.19m	23.08m (increase in 89cm over lifts 3 and 4)
Gross floor area	18,145m ²	No change proposed
Site access	Vehicular access is via Animoo Avenue, Noorebar Avenue and Warrambool Street.	No change proposed
Operational details	24 hours, 7 days a week	No change proposed
Hospital beds	117	No change proposed
Car parking spaces	357	No change proposed

The following sections outline the proposed modifications in detail.

2.1.1. Design Development

This application seeks to modify the approved architectural plans under SSD-9838218 to facilitate design development changes. DJRD Architects have prepared architectural plans (**Appendix A**) that detail the proposed modifications. DJRD Architects have also prepared a design statement that confirms the proposed modifications are consistent with the original design intent of the original approval and preserve the design's built form, urban design and design quality.

The proposed design development modifications to the Griffith Base Hospital are summarised in **Table 3** below.

Table 3 Proposed Design Modifications

Modification No.	Proposed Modification	Rationale
1	Revised roof pitch over Lifts 1 and 2	To allow for insulation to be installed over the lift and to allow water drainage off the roof.
2	Adjusted roof height and pitch, increasing maximum plant height by 89cm over lifts 3 and 4.	To allow for insulation to be installed over lift and for drainage of water off roof and weather protection of lift 4 door at roof level.
3	Roof top plant rooms area, shape, cladding profile and size amended roof top plant reduced from RL160.19 to RL 159.46.	To simplify the design of the rooftop plant room areas and improve efficiencies. This results in a reduction in height of 73cm. The roof pitch has been adjusted to improve water drainage.
4	Doors added to roof top plant rooms to the south west wing.	The allow safe access for maintenance staff.
5	Stair finish changed from metal sheeting to concrete and roof raised to stairs 1,2,3, and 4.	To simplify the material palette and allow greater height clearance within the stairs.
6	One large window split into three in Emergency Department waiting area.	To accommodate wall mounted audio-visual equipment for the improved amenity of the occupants.
7	Glass reinforced concrete replaced with compressed fibre cement plank and material size modified.	The approved glass reinforced concrete material was to be imported from Sweden and international shipping would have stalled the project. Therefore, it is proposed to use compressed fibre cement (CFC) plank in the same shade. The CFC will enhance the quality of the facade articulation.
8	Three windows added to the southern elevation of the main hospital building.	To provide more natural light and improved amenity to rooms.
9	Minor change to the paint colour of external concrete walls.	The revised colour is a shade of colour that is closer to the existing colour palette of the project.
10	Ventilation louvres added to roof top plant.	A mechanical engineering requirement due to further design development.
11	Finish changed from metal cladding to concrete.	To add further façade articulation.
12	Louvre added to plant room.	A mechanical engineering requirement due further design development.

Modification No.	Proposed Modification	Rationale
13	Louvre size reduced.	A mechanical engineering requirement as a result of further design development.
14	Compressed fibre cement cladding added in lieu of metal cladding.	To add further façade articulation.
15	Rainwater head size increased throughout the top level of the building.	A hydraulic engineering requirement due to further design development.
16	Louvre extent reduced.	A mechanical engineering requirement due to further design development.
17	Window added to Renal Department.	Improved amenity for chair-based occupants positioned along wall.
18	Extend of glazing increased with provision of colour back spandrel on the ground floor of the northern elevation.	To be consistent with the neighbouring fenestration
19	Ventilation louvre added to the northern elevation.	A mechanical engineering requirement due to further design finalisation.
20	Retaining wall height increased from 600 to 2100mm from pavement level and extent increased.	Due to design finalisation of civil strategy requiring water to drain away from the building. Batters have been proposed to minimise wall height.
21	Access door and ventilation louvre locations amended.	A mechanical engineering requirement due to further design finalisation.
22	Glazing extent adjusted and door added to the western elevation.	Due to location of mechanical plant room and relocation of egress door.
23	Window removed and louvre added to the western elevation.	The louvre is added due to a mechanical engineering requirement due to design development. The window no longer required in this space.
24	Rainwater head added to western elevation.	A hydraulic engineering requirement due to further design finalisation.
25	Window removed from the western elevation.	Due to internal TV placement.
26	Plant room shape changed from curvilinear to orthogonal on the roof.	A mechanical engineering requirement due to further design finalisation.

Modification No.	Proposed Modification	Rationale
		This will improve the amenity of the neighbouring rehabilitation terrace by diverting exhaust.
27	Louvre relocated	As a result of Modification 26.
28	Screen height and materiality change on the eastern elevation roof area.	Screen height increased to prevent climbing and screen changed from glass to perforated steel to provide privacy.
29	Door added to eastern elevation.	Due to redesign of space within Emergency Department and a requirement for fire egress to be provided.
30	Three (3) windows removed from the emergency department.	The windows are no longer required in these areas.
31	Construction of a 14m long x 6m wide concrete hardstand adjacent to the existing fire booster at the Noorebar Avenue entrance (to the north west of the site) for use by fire brigade trucks.	Required in order to comply with the National Construction Code.
32	Stair pressurisation enclosures added to roof area.	A mechanical requirement to enclose roof top stair pressurisation fans.
33	Extension of the compressed fibre cement to the stairs on the ground floor of the northern elevation.	To match the surrounding façade treatment.
34	Ventilation louvres removed.	A mechanical engineering requirement due to further design finalisation.
35	Ventilation louvres added.	A mechanical engineering requirement due to further design finalisation.
36	Louvre panel removed and aluminium cladding put in its place.	A mechanical engineering requirement due to further design finalisation.
37	Altered wall cladding colour on the southern elevation	Dark coloured cladding altered to light colour cladding to improve amenity of paediatric and inpatient terrace areas and to read as an extension of the internal wall finish.
38	Pedestrian ramps added to access St Vincent's Private	The pedestrian ramps are required for accessible entry/egress.

Modification No.	Proposed Modification	Rationale
	Community Hospital and Non-clinical support building	
39	Rainwater heads removed and replaced with overflow spigots	During the detailed design, it has been confirmed that the approved rainwater heads have become redundant and are proposed to be replaced with discrete overflow spigots. This will enhance the overall appearance of the tapered façade.
40	Solar panel arrangement updated on the main hospital roof	To maintain separation between the mechanical exhaust and access paths on the roof.
41	Mechanical exhaust flue added to east elevation	An exhaust flue is required for the mechanical ventilation system. The exhaust flue will be finished in a dark Colorbond colour (taken from the existing building colour palette).

2.1.2. Tree Removal

An Arborist Statement has been prepared by Creative Planning Solutions (CPS) (**Appendix B**). The site was impacted by a major storm event in October 2022 which resulted in Tree 168 (Spotted gum tree) and Tree 170 (Eucalyptus tree) losing many branches.

ADCO engaged an AQF Level 3 Arborist to cut/remove fallen branches and clean up any torn branches in accordance with AS4373 - Pruning of amenity trees. The AQF Level 3 Arborist made an on-site determination that Tree 170 (Eucalyptus tree) was no-longer viable and should be removed. This tree was subsequently removed to ground level by the contractor.

As this tree was required to be retained under Condition C23 (c) of the Development Consent, this modification seeks to reflect the removal of this damaged tree given the circumstances described above.

2.1.3. Fire Booster Hardstand

This modification application seeks consent for the construction of a 14m long x 6m wide concrete hardstand for use by fire brigade vehicles. The concrete hardstand is required to comply with the National Construction Code.

The proposed hardstand does not impact the existing footpath and there are sufficient ramp transitions between the hardstand. The hardstand is located outside of the site boundary, therefore the project team have consulted with Griffith City Council. Details of the engagement with Council are provided in Section 4 below.

2.2. PROPOSED AMENDMENTS TO CONDITIONS OF CONSENT

Pursuant to Section 4.55(1A) of the EP&A Act, this application seeks to amend the following conditions within the consent of SSD-9838218. For ease of reference, text proposed to be deleted is indicated by a ~~strike through~~ and text proposed to be added is indicated by **bold text**.

Terms of Consent

A2. The development may only be carried out:

- (a) in compliance with the conditions of this consent;
- (b) in accordance with all written directions of the Planning Secretary;

(c) generally in accordance with the EIS and Response to Submissions;

(d) in accordance with the approved plans in the table below:

Architectural Drawings prepared by DJRD Architects			
Dwg No.	Rev	Name of Plan	Date
SSDA 02	4 5	Proposed Site Plan	16/06/2021 11/07/2023
SSDA 03	2	Demolition Plan	30/03/2021
SSDA 10	3	Lower Ground Plan	14/04/2021
SSDA 11	3	Ground Floor Plan	14/04/2021
SSDA 12	3	First Floor Plan	14/04/2021
SSDA 13	3	Second Floor Plan	14/04/2021
SSDA 14	2 3	Roof Level Plan	30/03/2021 11/07/2023
SSDA 15	2 3	Roof Plan	30/03/2021 11/07/2023
SSDA 20	2	Site Sections	30/03/2021
SSDA 21	2	Building Sections A & B	30/03/2021
SSDA 22	2	Building Sections C & D	30/03/2021
SSDA 23	2 3	Site Elevations North & South	30/03/2021 11/07/2023
SSDA 24	2 3	Site Elevations East & West	30/03/2021 11/07/2023
SSDA 25	2 3	Building Elevations North & South	30/03/2021 11/07/2023
SSDA 26	3 4	Building Elevations East & West	16/06/2021 11/07/2023
SSDA 30	2 3	Materiality	30/03/2021 11/07/2023
SSDA 31	2 3	Façade Detail Sections & Elevations	30/03/2021 11/07/2023
SSDA 32	2 3	Façade Detail Sections & Elevations	30/03/2021 11/07/2023
SSDA 50	2	Staging Plans	30/03/2021
SSDA 60	2	Wayfinding	30/03/2021

Tree Protection

C19. For the duration of the construction works:

- (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property;
- (b) all street trees immediately adjacent to the approved disturbance area / property boundaries must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council;
- (c) all trees on the site that are not approved for removal are to be retained and must be suitably protected during construction as per the recommendations of the Arboricultural Impact Assessment dated 28 January 2021 **and Arboricultural Advice dated 26 April 2023** prepared by CPS; and
- (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.
- (e) an arborist is to be engaged to implement tree protection measures for the hollow bearing trees and other native trees to be retained on site.
- (f) all project materials must be stored in cleared areas of the site.

3. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project as proposed to be modified. It identifies the key statutory matters, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

3.1. STATUTORY REQUIREMENTS

Table 4 categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines*. A detailed statutory compliance table for the modified project is provided below.

Table 4 Identification of Statutory Requirements for the Project

Statutory Relevance	Action	Consistency with Approved Development
<i>Power to grant approval</i>	Schedule 1, Clause 14 of the State Environmental Planning Policy (Planning Systems) 2021 identifies development for the purposes of ‘hospitals, medical centres and health research facilities’ to be SSD if it has a capital investment value of more than \$30 million. The original SSDA had a CIV of greater than \$30 million and was therefore declared as State Significant Development.	The original application was assessed and declared as SSD. As the project has been declared SSD its assessment for the purpose of modifications remains under the SSD pathway.
<i>Permissibility</i>	The proposed development is defined as a health services facility in accordance with the <i>Griffith Local Environmental Plan 2014</i> . Health services facilities are permitted with development consent in the R1 General Residential zone.	The proposed modification remains permissible in the R1 General Residential zone.
Other approvals		
No requirements for other approvals have been identified for the Modification Report.		

3.2. MANDATORY CONSIDERATIONS

Table 5 outlines the relevant mandatory considerations to exercising the power to grant approval which were considered in the original SSDA.

Table 5 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in Modification Report
Consideration under the EP&A Act and the Regulations		
Section 1.3	Relevant objects of the EP&A Act	Consistent with the assessment included in the approved EIS under SSD-9838218.
Section 4.15	Relevant environmental planning instruments	
	State Environmental Planning Policy (Planning Systems) 2021	Table 6 below

Statutory Reference	Mandatory Consideration	Section in Modification Report
	State Environmental Planning Policy (Transport and Infrastructure) 2021	Table 6 below
	State Environmental Planning Policy (Resilience and Hazards) 2021	Table 6 below
	Griffith Local Environmental Plan 2014	Table 6 below
	Relevant draft environmental planning instruments	Table 6 below
	Relevant planning agreement	Table 6 below
	Development Control Plans	Table 6 below
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 5
	The suitability of the site for the development	Section 6.3
	The public interest	Section 6.4
Section 4.55(1A)	The proposed development is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all).	Section 6.1 and 6.2

3.3. STATUTORY COMPLIANCE

The proposed modifications to the approved of SSD-9838218 are such that there will be no material alteration to the level of compliance achieved with the relevant EPI's as described in **Table 6** below.

Table 6 Statutory Compliance Table

Schedule/ Clause	Provision	Consistency
State Environmental Planning Policy (Planning Systems) 2021		
Schedule 1	<p>Schedule 1, Clause 14 of the Planning Systems SEPP identifies development for the purposes of 'hospitals, medical centres and health research facilities' to be SSD if it has a capital investment value of more than \$30 million.</p> <p>The original SSDA had a CIV of greater than \$30 million and was therefore declared as State Significant Development.</p>	<p>Complies.</p> <p>The original application was assessed and declared as SSD.</p> <p>As the project has been declared SSD its assessment for the purpose of modifications remains under the SSD pathway.</p>
State Environmental Planning Policy (Transport and Infrastructure) 2021		
Schedule 3 – Traffic Generating Development	The SEPP deals with traffic generating development and requires referral and concurrence of the NSW RMS for certain development which is expected to generate significant traffic.	<p>Complies.</p> <p>The approved Griffith Base Hospital will provide 117 beds, therefore not meeting the threshold to trigger consultation with Transport for NSW.</p> <p>The proposal does not seek increase the amount of hospital beds, therefore consultation with Transport for NSW is not required.</p>
Division 10 – Health Services Facilities	Under Division 10, health services facilities may be carried out by any person with consent on land in a prescribed zone. Under Clause 2.59 of the Transport and Infrastructure SEPP, the R1 General Residential zone is a prescribed zone.	<p>Complies.</p> <p>The modified proposal is permissible via the Transport and Infrastructure SEPP and the Griffith LEP 2014.</p>
State Environmental Planning Policy (Resilience and Hazards) 2021		
Chapter 4 – Remediation of land	The policy states that land must not be developed if contamination renders it unsuitable for a proposed use. If the land is unsuitable, remediation must take place before the land is developed.	<p>Complies.</p> <p>An Environmental Site Assessment and Remediation Action Plan was submitted with the original SSDA.</p>

Schedule/ Clause	Provision	Consistency
		The proposed modifications do not impact the requirements of the RAP.
Griffith Local Environmental Plan 2014		
4.3 Height of Buildings	No height control applies to the site.	Complies. The proposed increase in maximum building height of 89cm over Lifts 3 and 4 is minor considering the scale of the approved building and the size of the site and proximity to neighbouring buildings. Various sections of the approved building are proposed to be modified, as outlined in detail in Table 3. The overall maximum building height is proposed to increase by 89cm.
4.4 Floor Space Ratio	No FSR control applies to the site.	Complies. No change in floor space ratio is proposed.
5.10 Heritage Conservation	Conserve the environmental heritage of Griffith and the heritage significance of heritage items and heritage conservation areas. Conserve archaeological sites and Aboriginal objects and places of heritage significance.	Complies. The site is listed as containing a locally listed heritage item known as "Former Matron's House and Nurses Quarters at Base Hospital". Both the Nurses Quarters and Former Matron's House have been previously approved for demolition under a separate planning pathway. The Former Matron's House and Nurses Quarters have already been demolished. Therefore the proposed minor modifications will not create an additional heritage impact than that already approved on the site.
7.1 Earthworks	Ensure earthworks will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or	Complies.

Schedule/ Clause	Provision	Consistency
	heritage items or features of the surrounding land.	No additional earthworks are proposed through this modification application.
7.2 Flood planning	Minimise flood risk to life and property associated with the use of land.	Complies. The site is not within a flood planning area, however areas downstream of the site are flood affected. The proposed modifications to the façade and services plant areas will not create additional flood impacts.
7.8 Airspace operations	Provide for the effective and ongoing operation of the Griffith Airport by ensuring that such operation is not compromised by proposed development that penetrates the Limitation or Operations Surface for that airport.	Complies. The proposed development will not penetrate the Limitation or Operations Surface for the airport.
7.9 Development in areas subject to aircraft noise	This clause applies to development that— (a) is on land that— (i) is near the Griffith Airport, and (ii) is in an ANEF contour of 20 or greater, and (b) the consent authority considers is likely to be adversely affected by aircraft noise	Complies. The site is not within an ANEF contour of 20 or greater. The proposed development will not be adversely affected by aircraft noise associated with Griffith Airport.
Griffith Development Control Plan	The provisions of a DCP do not apply to State Significant Development in accordance with Clause 2.10 of the Planning Systems SEPP 2021.	N/A

4. ENGAGEMENT

The Project Team contacted Griffith City Council on 8 May 2023, seeking approval for the construction of the fire brigade hardstand on Council's land.

Griffith City Council confirmed on 30 May 2023 via email that Council has no objection to the proposed hardstand location in front of the sprinkler tank and pump room to the north-west of the site. Council also noted that the proposed hardstand is partially on the road reserve. Council is willing to accept this location, without imposing any licence or lease due to the nature of the proposed development and use associated with Emergency Services.

The Project Team sent a letter on 10 July 2023 to give notice to Council (as the land owner of the road reserve on Animoo Avenue) of the proposed development in accordance with Sections 23(2) and 23(3)(a) of the *Environmental Planning and Assessment Regulation 2021*.

The Applicant will continue to engage with Council through the exhibition process of this modification application.

5. ASSESSMENT OF IMPACTS

Each of the potential impacts arising from the proposed modification is assessed in detail within the following subsections of this report, supported by relevant specialist consultant inputs where necessary.

It is noted that the proposed modifications do not result in an updated project description or updated mitigation measures. Therefore, these appendices have not been provided (as required by DPE's *State Significant Development Guidelines – preparing a modification report*).

5.1. BUILT FORM AND DESIGN

A Design Statement has been prepared by DJRD and is provided at **Appendix A**. The Design Statement confirms the proposed modifications are consent with the original design intent and preserve the approved built form, urban design and design quality.

The proposed increase in maximum building height of 89cm over Lifts 3 and 4 is minor considering the scale of the approved building and the size of the site and proximity to neighbouring buildings.

Various sections of the approved building are proposed to be modified, as outlined in detail in Table 3. The overall maximum building height is proposed to increase by 89cm. The change in façade cladding material is consistent with the materiality of the approved design and further enhances the façade articulation.

In summary, the proposed changes will have no impact on the overall architectural quality and aesthetic of the development. The proposed modifications have been designed by DJRD, the original Architect of the approved development and the overall design quality and architectural expression of the building has been maintained.

5.2. TREE REMOVAL

An Arborist Statement has been prepared by Creative Planning Solutions (CPS) (**Appendix B**). The site was impacted by a major storm event in October 2022 which resulted in Tree 168 (Spotted gum tree) and Tree 170 (Eucalyptus tree) losing many branches.

ADCO engaged an AQF Level 3 Arborist to cut/remove fallen branches and clean up any torn branches in accordance with AS4373 - Pruning of amenity trees. The AQF Level 3 Arborist made an on-site determination that Tree 170 (Eucalyptus tree) was no-longer viable and should be removed. This tree was subsequently removed to ground level by the contractor.

The assessment of this tree completed by CPS in November of 2020 determined that it was of a semi-mature age class, generally of a minor nature and featured only a 'Short' Safe Useful Life Expectancy (SULE) due to being in fair-poor health and condition. Therefore, the removal of this tree will not have an impact on the character of the surrounding landscape setting.

As this tree was required to be retained under Condition C23 (c) of the Development Consent, this modification seeks to reflect the removal of this damaged tree given the circumstances described above.

5.3. BUILDING CODE OF AUSTRALIA COMPLIANCE

Blackett Maguire and Goldsmith (BMG) have prepared a Building Code of Australia (BCA) report (**Appendix C**) to assess the proposed modifications.

BMG's assessment includes a desktop assessment of the deemed-to-satisfy provisions of the BCA 2019 (Amendment 1) and the Disability (Access to Premises – Buildings) Standards 2010. BMG has also reviewed the modifications against their 100% Design Development BCA Report R10, dated 21 December 2022.

In summary, BMG has confirmed that the proposed modifications can comply with Conditions of Consent A17, A18, and AN4 of SSD, which require compliance with the National Construction Code and BCA. BMG also confirm that any necessary design amendments required for BCA compliance can be addressed during the preparation of the detailed documentation for the Crown Certificate without significant changes to the proposal submitted for SSDA.

5.4. ACOUSTIC

E-LAB Consulting have prepared an Acoustic Statement to assess the acoustic impacts from the proposed modifications. E-LAB Consulting conclude that the proposed modifications to the building will not impact the findings or recommendations included in the approved Noise Impact Assessment (NIA) and the Construction Noise and Vibration Management Sub-Plan (CNVMSP). Therefore, the existing NIA and CNVMSP are considered applicable to the revised scheme.

E-LAB Consulting conclude the proposed modifications will continue to comply with the noise criteria conditioned in the NIA and CNVMSP, and the relevant acoustic conditions within the SSD-9838218 approval.

5.5. ECOLOGICALLY SUSTAINABLE DEVELOPMENT

E-LAB Consulting have prepared a Ecologically Sustainable Development (**ESD**) Statement (**Appendix E**) to confirm compliance with the Design Guidance Note No. 058 (**DGN058**) for Environmentally Sustainable Development. E-LAB Consulting conclude that the proposed modifications are minor and will not affect compliance with DGN058 or other approved sustainability targets for the project.

6. JUSTIFICATION OF MODIFIED PROJECT

6.1. MINIMAL ENVIRONMENTAL IMPACT

Section 4.55(1A) of the EP&A Act requires that, an application to modify a consent under this part, demonstrate that it results in minimal environmental impact. As detailed in **Section 4** of this report, the proposal has been accompanied by various consultant reports each attached in the appendix of this report that consider the impacts of the proposed modification.

It is concluded that from the above and accompanying technical reports, the proposed modification is considered to give rise to only a minimal environmental impact in accordance with 4.55(1A) of the EP&A Act.

6.2. SUBSTANTIALLY THE SAME DEVELOPMENT

Based on the description of the proposed modifications in Section 4, it is considered the proposal is substantially the same development as that to which consent was originally granted, as is required by section 4.55(1A) of the Act. The proposed modifications do not substantially change the development for which consent was originally granted under SSD-9838218 for the reasons outlined below:

- The modified development does not propose any changes to the approved land uses or gross floor area on site.
- The proposed increase in height to Lifts 3 and 4 of 89cm is minor considering the scale of the approved building and the size of the site and proximity to neighbouring buildings. The minor increase in height to lifts 3 and 4 will not create noticeable bulk or scale impacts.
- The key design principles of the approved development remain unchanged as detailed in **Appendix A** and **Section 4.4.1**. The proposed design development changes are minor and are required due to detailed design. The proposed changes will have no impact on the overall architectural quality and aesthetic of the development.
- As outlined in Section 5 of this report, the proposal will not create any acoustic impacts, continues to meet the requirements of the BCA and NCC, and meet the relevant ecologically sustainable development requirements.
- The development will remain consistent with the land use objectives for Zone R1 General Residential.

The proposed development is therefore not only materially the same scale as that approved, but also essentially the same function and intensity of use as that approved within SSD-9838218. The proposed modifications are therefore sustainability the same as the development approved under SSD-9838218.

6.3. SUITABILITY OF THE SITE

The proposed modifications will not result in any changes that would affect the suitability of the site to accommodate the development approved under SSD-9838218. In summary:

- The modified proposal is permissible in the R1 General Residential zone pursuant to the Griffith Local Environmental Plan 2014. The modified proposal is consistent with the objectives of the zone as it will deliver significant investment in and the construction of critical infrastructure, add to the creation of construction related and long-term operational jobs and will improve health facilities and services for the community of the Riverina-Murray region.
- The proposed façade and exterior colour scheme of the building have been designed to be sympathetic to the surrounding residential context and the site's parkland setting.
- The proposal is considered suitable for the site as it delivers world class health services and facilities which align with relevant strategic and statutory planning policies and significant NSW Government investment in public infrastructure.

Accordingly, the proposed modifications are considered highly suitable for the site.

6.4. PUBLIC INTEREST

The modified proposal is considered in the public interest for the following reasons:

- The modified proposal complies with the relevant State and local planning controls.
- The project will provide expanded inpatient, surgical, ambulatory care and critical care services to Griffith Base Hospital. It will also enable the consolidation of several ageing and dislocated buildings into an integrated and contemporary healthcare facility.
- No adverse environmental, social or economic impacts will result from the modified proposal.
- The modifications allow the construction of the hardstand adjacent to the fire booster hydrant for fire brigade trucks, as required by the National Construction Code.
- The principles of ecologically sustainable development were an integral consideration in the design of the proposed development. The ESD Statement (**Appendix E**) confirms the modified proposal will continue to achieve high levels of ESD.
- The project will result in the delivery of 172 jobs during the construction phase and a total of 441 operational jobs.

Therefore, the proposed modification is consistent with the approved development for the subject land and is necessary to facilitate to continued project delivery and continuing construction on this key site in Griffith.

6.5. CONCLUSION

Based on the content contained throughout this report and the accompanying appendices, it is considered that the proposed modifications to SSD-9838218 will result in substantially the same development as well originally approved and therefore should be approved, subject to the implementation of appropriate conditions.

DISCLAIMER

This report is dated 22 August 2023 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 (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of ADCO (**Instructing Party**) for the purpose of Section 4.55(1A) Modification Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

ARCHITECTURAL PLANS AND DESIGN STATEMENT

APPENDIX B

ARBORIST STATEMENT

APPENDIX C

BCA COMPLIANCE STATEMENT

APPENDIX D

ACOUSTIC STATEMENT

APPENDIX E

ESD STATEMENT

