

# Statement of Environmental Effects

**Key Health Care Worker Accommodation – Narrandera  
District Hospital**

**54-64 Adams Street, Narrandera**

Submitted to Narrandera Shire Council  
on behalf of NSW Health Infrastructure



**'Gura Bulga'**

Liz Belanjee Cameron



**'Dagura Buumarri'**

Liz Belanjee Cameron



**'Gadalung Djarri'**

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

**Contact:** Chris McGillick  
Director – Planning  
CMcGillick@ethosurban.com  
0411 047 748

**This document has been prepared by:**

**This document has been reviewed by:**

Matthew Short

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Chris McGillick

6 June 2024

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Appendix	Author
A. Architectural Plans	<i>Kearney Architecture</i>
B. Landscape Plans	<i>Agla</i>
C. Civil Plans	<i>Kehoe Meyers</i>
D. Bushfire Assessment	<i>Peterson Bushfire</i>
E. Construction Waste Management Plan	<i>Hutchinson Builders</i>
F. Preliminary and Detailed Site Investigation & Remediation Action Plan	<i>JK Geotechnics</i>
G. Cost Summary Report	<i>Genus Advisory</i>

# 1.0 Introduction

This Statement of Environmental Effects (**SEE**) is submitted to Narrandera Shire Council in support of an Integrated Crown Development Application (**DA**). The DA seeks consent to install key health care worker accommodation (**the Proposal**) within the Narrandera District Hospital at 54-64 Adams Street, Narrandera (**the hospital site**).

The Proposal is part of NSW Health Infrastructure's Key Worker Accommodation Program, which seeks to provide critically needed housing in regional and rural areas of NSW to help attract and retain health workers and staff.

This DA specifically seeks consent for the following:

- Site preparation works.
- Installation of three (3) modular housing units.
- Augmentation of site services
- Site landscaping

This SEE has been prepared by Ethos Urban on behalf of NSW Health Infrastructure (**the Proponent**) and is based on the Architectural Plans provided by Kearney Architecture (see **Appendix A**) and other supporting technical information appended to the report (see **Table of Contents**).

The DA is Integrated Development under Section 4.46 of the *Environment Planning & Assessment Act 1979* (**EP&A Act**), as it involves the development of a hospital on bushfire prone land. Therefore, the DA requires approval from the NSW Rural Fire Service Commissioner under Section 100B of the *Rural Fires Act 1997*.

This report describes the site, its environs and the proposed development, and provides an assessment of the environmental impacts and identifies the steps to be taken to protect or lessen the potential impacts on the environment. The application is recommended for approval given the following reasons:

- The Proposal is in the public interest as it provides critically needed housing to help attract and retain health workers at the Narrandera District Hospital. This supports the overall health and well-being of the local community, particularly as the Narrandera Shire has an ageing population.
- The Proposal provides a secure housing supply for health care workers unaffected by external demand pressures in the general rental housing market.
- The proposed housing is within walking distance of the Narrandera Town Centre and features good access to facilities and services.
- The site is suitable for the proposed development as:
  - The site's bushfire hazards can be appropriately managed, as outlined in **Section 5.4.5**. The site is not encumbered by other hazards and constraints such as flooding, wetlands, riparian land, watercourses, terrestrial biodiversity, threatened species and steep topography.
  - The site contains an existing hospital campus (Narrandera District Hospital), and thus, the key health care worker accommodation complements the site's function and character.
  - The site's size enables the Proposal to incorporate generous setbacks to mitigate impacts to neighbouring development.
- The Proposal's environmental impacts are minimal and acceptable. In particular:
  - The units are single-storey and located approximately 90m from the nearest primary street frontage (Adams Street), 17m from the nearest hospital building on site, and 26m from the nearest building on the TAFE site to the north. Therefore, the units are sufficiently separated to avoid adverse acoustic, overshadowing, visual, or privacy impacts on neighbouring development.
  - The proposed units are approximately 17m from the heritage curtilage of the Narrandera District Hospital Group heritage item. Therefore, they won't affect the item's heritage significance.
  - The Proposal will increase the number of trees in the hospital site's northern portion.
  - The Proposal will moderately reduce the total number of vehicle trips associated with the hospital, as staff who originally drove to work can now walk to work instead. As such, the Proposal will have a negligible (albeit positive) impact on the performance of the surrounding road network.

- The proposed units include sustainability initiatives, including water and energy-efficient fixtures and fittings, passive heating, and cooling design features, and they are solar-ready.
- The DA provides a temporary source of local construction employment.
- The Proposal is permissible with consent and complies with the relevant provisions of the *Narrandera Local Environmental Plan 2013* and the *Narrandera Development Control Plan 2013*.

## 2.0 Background

### 2.1 Key Worker Accommodation Program

Local Health Districts (**LHDs**) are experiencing challenges in attracting and retaining health care workers and staff in regional and rural New South Wales due to an urgent need for more key health care worker accommodation. In response, the NSW Government is implementing the Key Worker Accommodation Program, which will deliver modern short- and long-term housing accommodation across the three LHDs of Southern NSW, Murrumbidgee, and Far West LHD.

As a part of this program, the Narrandera District Hospital was identified as a location for new housing based on criteria including the scale of need, type of accommodation needs, potential beds, and existing demand and supply of accommodation.

### 2.2 Pre-DA Meeting

The Applicant and their consultant team attended a pre-lodgement application meeting with planning officers from the Narrandera Shire Council on 30 November 2023 to discuss the DA. The Council's officers advised that no notable issues were identified based on the supplied pre-DA information. The Council also confirmed that the DA should be accompanied by the following documents.

- Architectural Plans
- Landscape Plans
- Stormwater Drainage Concept Plans
- Statement of Environmental Effects
- Site Survey
- Cost Summary Report
- Construction Waste Management Plan
- Bushfire Assessment
- Preliminary Site Investigation (and potentially a Detailed Site Investigation).

All the above-listed documents accompany this DA.

At the pre-DA meeting, the project team indicated that BASIX Certificates would accompany the DA. Since then, the project team received advice that the proposed accommodation is classified as a 'Class 3 building'<sup>1</sup> under the *National Construction Code*. A Class 3 building does not require a BASIX certificate.

### 2.3 Crown Development

Pursuant to Section 294(a) of the *Environmental Planning and Assessment Regulation 2021*, Health Infrastructure is deemed a statutory body prescribed as the Crown. Accordingly, the proposal is a Crown development for the purposes of Part 4 Division 4.6 of the EP&A Act. Under the provisions for Crown developments:

- The DA cannot be refused (except with the approval of the Minister for Planning);
- The applicant has the opportunity to review the draft conditions; and
- Council cannot impose conditions of consent without the applicant's or Minister's agreement.

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<sup>1</sup> Class 3 buildings are a common place of long term or transient living for a number of unrelated people. Examples include a boarding house, guest house, hostel or backpackers (that are larger than the limits for a Class 1b building). Class 3 buildings could also include dormitory style accommodation, or workers' quarters for shearers or fruit pickers

# 3.0 Site Analysis

## 3.1 Site Location and Context

The DA relates to the Narrandera District Hospital at 54-64 Adams Street, Narrandera, within the Narrandera Shire Local Government Area (LGA). Narrandera Shire is situated centrally in the Riverina region of NSW, 554 km southwest of Sydney, 339km west of Canberra and 437 km north of Melbourne. The Shire had a population of 5,698 people as of the 2021 Census.

Narrandera is the Shire's major urban centre, housing approximately two-thirds of the Shire's population. The town features a concentration of services and facilities, including the Narrandera Art and Community Centre, a TAFE, public and private schools and the Narrandera District Hospital. The Hospital is approximately 600m west of the town's main street, East Street.

Figure 1 shows the hospital site's locational context.



Figure 1 Locational context

Source: Nearmap, edits by Ethos Urban



### 3.2 Site Description

As illustrated in **Figure 2**, the hospital site comprises 14 lots.

The proposed accommodation will be situated on one lot, legally described as Lot 3 DP 129211, that covers an area of 10,62.13m<sup>2</sup>. **Figure 2** shows the location of the proposed accommodation within the hospital site. The Proposal also involves site landscaping works on Lot 2 DP 129211 and Lot 1 DP 129140.

**Table 1** further below provides an overview of the hospital site's key details.



**Figure 2 Site Aerial**

Source: Nearmap, edits by Ethos Urban

**Table 1 Hospital Site Information**

Aspect		Information
<b>Address</b>		<p>54-64 Adams Street, Narrandera</p> <p>The hospital site also features a frontage to Douglas Street (to the south), Jellinbah Street (to the west), and Dixon Place (to the north). Dixon Place is the nearest road to the proposed accommodation.</p>
<b>Legal Description</b>		<p>The entire hospital site comprises the following lots.</p> <ul style="list-style-type: none"> <li>• Lots 1-6 Section 64 DP 758757</li> <li>• Lot 1 DP 129140</li> <li>• Lots 1-5 DP 129211</li> <li>• Lot 1 DP 132967</li> <li>• Lot 1 Section 69 DP 758757</li> </ul> <p>The proposed works are contained to the following lots.</p> <ul style="list-style-type: none"> <li>• Lot 3 DP 129211</li> <li>• Lot 2 DP 129211</li> <li>• Lot 1 DP 129140</li> </ul>
<b>Site Area</b>	<b>Hospital Site</b>	Approximately 3.29ha
	<b>Lot 1 DP 129140 + Lots 2-3 DP 129211</b>	Approximately 7691m <sup>2</sup>
<b>Existing Development</b>		<p>The hospital site is occupied by the Narrandera District Hospital, a 34-bed hospital that provides 24-hour care for the Narrandera Shire LGA. The site contains:</p> <ul style="list-style-type: none"> <li>• A main hospital complex fronting Douglas Street.</li> <li>• An existing nurses' accommodation block with vehicular access from Adams Street.</li> <li>• A workshop and storage sheds.</li> </ul> <p>As illustrated in <b>Figure 2</b>, the location for the proposed accommodation is cleared open space.</p>
<b>Topography</b>		<p>The hospital site's topography gradually declines in a southeast direction from a high point of approximately 170m AHD at its northwest corner to 158m AHD at its southwestern corner.</p> <p>The location for the proposed accommodation features a gentle southeast decline.</p> <p>This DA is accompanied by Architectural Plans that include a Survey Plan (<b>Appendix A</b>).</p>
<b>Transport and Access</b>	<b>Car Parking and Site Access</b>	<p>The hospital site contains four parking areas. The main car park is located at the hospital site's rear, adjacent to the proposed accommodations' location. This car park is accessed from Dixon Place and contains 20 parking spaces, including two accessible spaces.</p> <p>There are also on-street perpendicular parking spaces available along Douglas Street.</p>
	<b>Public Transport</b>	<p>The Narrandera Train Station is approximately 1km to the hospital site's northwest. The Station is frequented by train and coach services that connect commuters to Wagga Wagga, Leeton, Goulburn and Griffith.</p> <p>Narrandera Leeton Community Transport also provides door-to-door services within Narrandera for older frail residents, those living with a disability and people who are transport disadvantaged.</p>
<b>Vegetation</b>		<p>The hospital site contains scattered trees, particularly near the hospital site's frontages. The site is <b>not</b> identified as containing vegetation with mapped biodiversity values on the NSW Planning Portal Spatial Viewer.</p> <p>The location for the accommodation features several trees around its peripheries, none of which require removal to facilitate the proposed development.</p>

Aspect	Information
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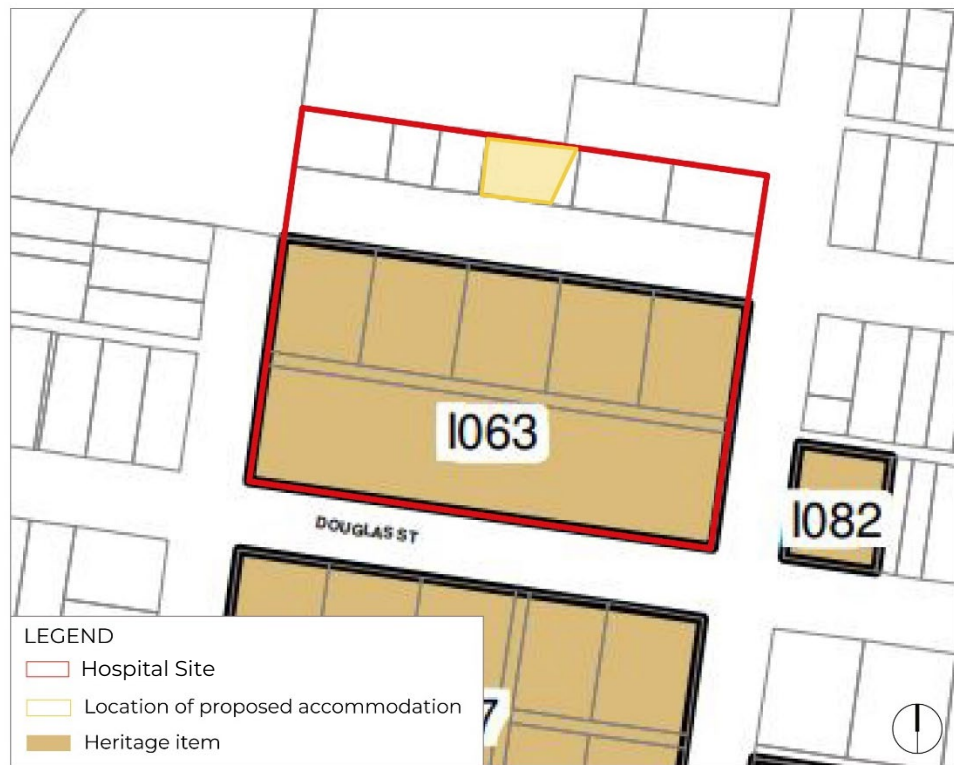
**Surface Water and Flooding**

The hospital site is **not** affected by 1% or 5% AEP flooding. The site is also **not** identified within a Flood Planning Area on the Flood Planning Map under the *Narrandera Local Environmental Plan 2013*.

**Heritage**

As illustrated in **Figure 3**, part of the hospital site is mapped as a local heritage item, described as 'Narrandera District Hospital Group' under Schedule 5 of the *Narrandera Local Environmental Plan 2013* (I063).

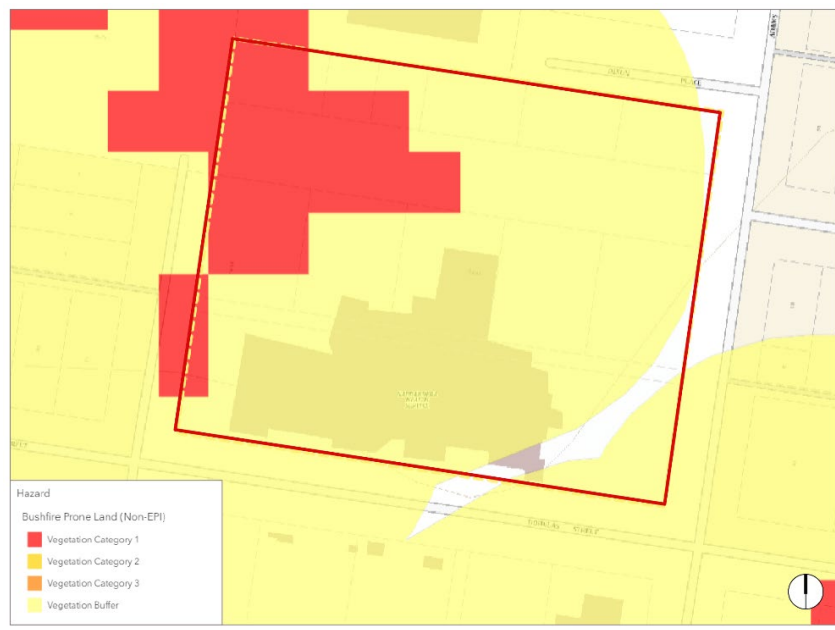
The location for the proposed accommodation is outside the part of the site mapped as a heritage item.



**Figure 3 Heritage Mapping**  
Source: Narrandera LEP 2013

**Bushfire**

As shown in **Figure 4**, most of the hospital site is identified as either 'Category 1 bushfire prone land' or 'vegetation buffer'. The location for the proposed accommodation is identified as 'vegetation buffer' land.



**Figure 4 Bushfire Mapping**

Source: NSW Government eSpatial Planer

### 3.3 Surrounding Development

The hospital site is in a predominately residential neighbourhood, surrounded by detached dwellings. The following points summarise the hospital site’s surrounding context.

- **North:** The Narrandera TAFE campus and Narrandera Preschool Early Childhood Centre are immediately north of the site. There is a row of existing vegetation along the site’s northern boundary that provides some visual screening between the site and these neighbouring facilities.
- **East:** Residential dwellings are located to the site’s east on the other side of Adams Street.
- **South:** The Narrandera Public School is immediately to the site’s south on the other side of Douglas Street.
- **West:** Residential dwellings and a vacant lot are located to the site’s west. The vacant site is identified as a location for a future aged care facility in the *Narrandera Development Control Plan 2013*.



**Figure 5 Surrounding Development**

Source: Nearmap, edits by Ethos Urban

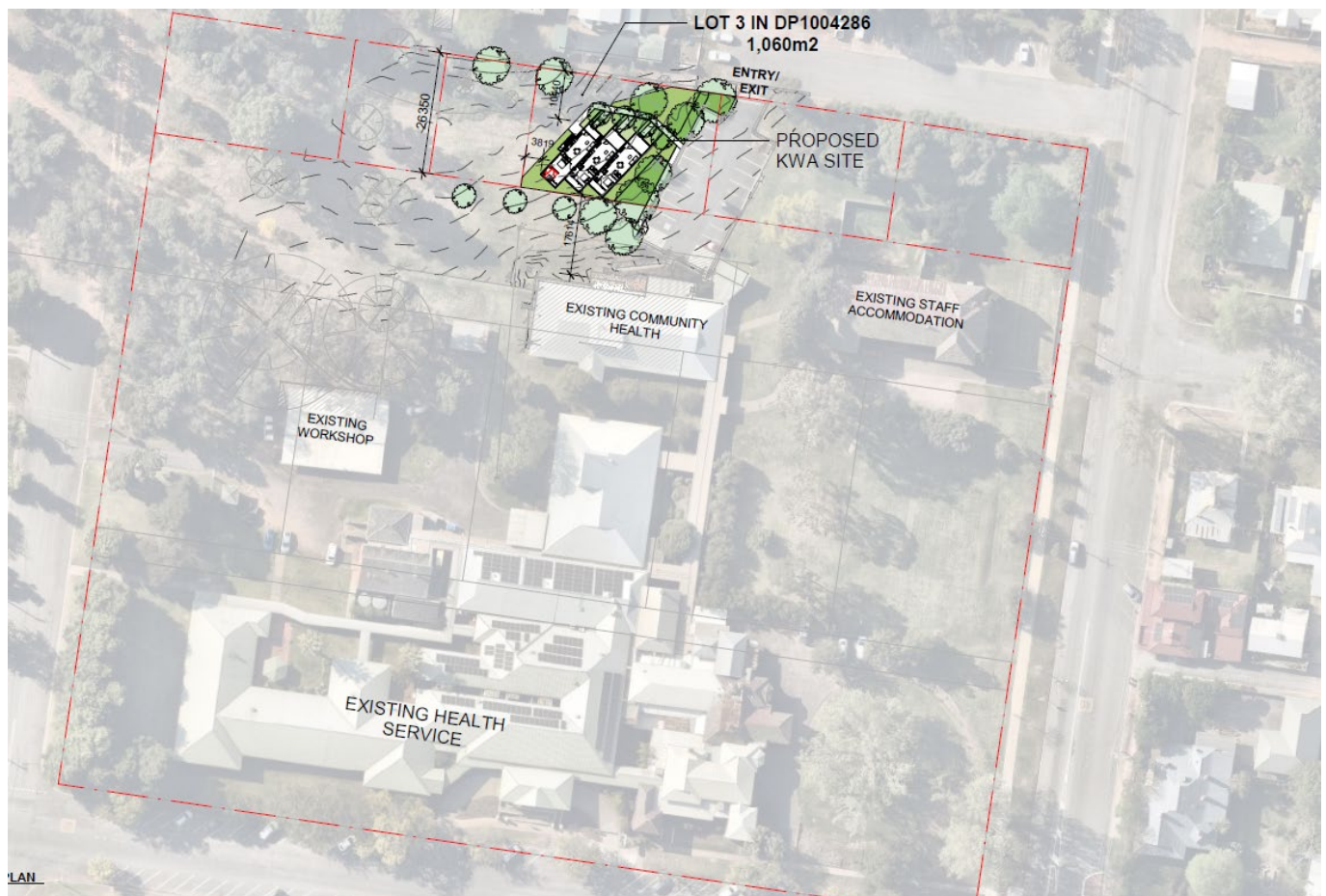
## 4.0 Description of Proposed Development

As part of the NSW Government's Key Worker Accommodation program, which seeks to provide critically needed housing in regional and rural areas of NSW to help attract and retain health workers, the development application seeks consent for:

- Site preparation works.
- Installation of three (3) modular housing units.
- Augmentation of site services
- Site landscaping

The DA is accompanied by Architectural drawings (**Appendix A**) and a Landscape Plan (**Appendix B**) that illustrate and describe the proposed work.

**Figure 6** shows the location of the proposed accommodation, while **Figure 7** provides a render illustrating the accommodation's appearance.



**Figure 6** Site Plan

Source: Kearney Architecture



**Figure 7 Architectural Render**

Source: Kearney Architecture

## 4.1 Numerical Overview

The Proposal's key numeric development information is summarised in **Table 2**.

**Table 2 Key development information**

Component	Proposal
Units	3 x 1-bedroom units (including 1 accessible unit)
GFA	155.62m <sup>2</sup>
Maximum Height	4.3m
Boundary Setbacks	
• North	10.4m

## 4.2 Development Siting

The project team adopted the following criteria to determine an appropriate location for the proposed accommodation.

- Level area of 300 to 400m<sup>2</sup>
- Adjacent drainage connections, water service and power supply.
- Existing privacy or capable of being screened from the public gaze.
- Capable of being screened from traffic noise.
- Minimal site clearing and demolition work.
- No general restrictions to the installation of solar panels.

As a result of the above criteria, the project team identified the location shown in **Figure 6** for the proposed accommodation. In addition, this location benefits from good solar access, existing vegetation to the north that provides visual screening and convenient access to parking in the site's existing northern carpark.

The proposed layout also allows for the potential future expansion of additional units to the west. These units would be the subject of a separate planning approval.

### 4.3 Site Preparation

The Proposal does not require any tree removal or demolition of structures to facilitate the proposed development. Some grading will be required to prepare the laydown area for the accommodation. The accommodation requires some 600mm clearance above ground level and will be fixed to piers. This construction technique minimises the extent of grading needed.

### 4.4 Installation of Key Health Care Worker Accommodation

As illustrated in **Figure 8**, the DA seeks consent to install three (3) single-storey modular units. The units are modular and feature a shared wall/s with adjoining units. The three units are staggered to maximise solar access and measure approximately 4.3m in height.

Each unit is self-contained and features one (1) bedroom, a bathroom, a kitchen and a living area.

One of the units is an accessible unit.



**Figure 8** Proposed Ground Floor Plans

Source: Kearney Architecture

### 4.5 Site Access and Parking

The proposed accommodation will be connected to the existing car park to the accommodation's east and the broader hospital campus via a new footpath. Staff living in the accommodation will utilise existing parking spaces in the car park adjacent to the development.

### 4.6 Services and Infrastructure

Once the modular units are placed, they will be connected to essential services, including electricity, water, and stormwater. This DA is accompanied by Civil Plans prepared by Kehoe Myers that show the location of existing services and illustrate the accommodation's proposed stormwater system (**Appendix C**).





## 5.0 Planning Assessment

Under Section 4.15(1) of the EP&A Act, in determining a DA the consent authority must consider a range of matters relevant to the development. These include the provisions of environmental planning instruments; impacts of the built and natural environment; the social and economic impacts of the development; the suitability of the site; and whether the public interest would be served by the development.

The assessment includes only those matters under Section 4.15(1) that are relevant to the Proposal. The planning issues associated with the proposed development are assessed below.

### 5.1 Environmental Planning & Assessment Act 1979

The DA is defined as a Crown Development Application under Division 4.6 of the EP&A Act as it is a development application made by a public authority (NSW Health Infrastructure). Under Section 4.33(1) of the EP&A Act, the consent authority (other than the Minister) must not:

- Refuse its consent to a Crown development application, except with the approval of the Minister; or
- Impose a condition on its consent to a Crown development application, except with the approval of the applicant or the Minister.

The DA is also Integrated Development under Section 4.46 of the EP&A Act, as it involves the development of a hospital on bushfire prone land. Therefore, the DA requires approval from the NSW Rural Fire Service Commissioner under Section 100B of the *Rural Fires Act 1997*.

### 5.2 Environmental Planning Instruments

#### 5.2.1 State Environmental Planning Policies

The relevant state environmental planning policies are assessed in **Table 3** below.

**Table 3 Summary of consistent with State Environmental Planning polices**

Plan	Comments
<p><i>State Environmental Planning Policy (Resilience and Hazards) 2021</i></p> <p>(SEPP Resilience and Hazards)</p>	<p>Section 4.6 of <i>State Environmental Planning (Policy Resilience and Hazards) 2021</i> states that a consent authority must not consent to the carrying out of any development on land unless it:</p> <ul style="list-style-type: none"> <li>• has considered whether the land is contaminated, and</li> <li>• if contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable after remediation) for the purpose for which the development is proposed to be carried out.</li> </ul> <p>The DA is accompanied by a Preliminary and Detailed Site Investigation prepared by JK Geotechnics (<b>Appendix F</b>). The Detailed Site Investigation (<b>DSI</b>) analysed soil sampling from six test pits. That testing identified Heptachlor in fill soil above the health-based criteria in one location. The DSI considers that in the current site configuration, whilst the area remains grassed and the soils remain undisturbed, the risks associated with exposure to Heptachlor in soil would be acceptable.</p> <p>Nevertheless, the DSI states that remediation of the site through a Remediation Action Plan is required to address the contamination in fill soil. It notes that remediation of the contaminant of concern in fill is considered to be straightforward and that the site can be made suitable for the proposed development via remediation.</p> <p>Accordingly, the development application is accompanied by a Remediation Action Plan (<b>Appendix F</b>).</p>
<p><i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i></p> <p>(TISEPP)</p>	<p>The proposed development is not classified as Traffic Generating Development under the <i>SEPP (Transport and Infrastructure) 2021</i>.</p>

Plan	Comments
<p><b>State Environmental Planning Policy (Sustainable Buildings) 2022</b></p> <p>(SEPP Sustainable Buildings)</p>	<p>The proposed units are classified as Class 3 buildings under the <i>National Construction Code</i> as they are a common place of long-term or transient living for a number of unrelated people. BASIX does not apply to Class 3 buildings. Therefore, Chapter 2 of the SEPP Sustainable Buildings, which outlines standards for BASIX development and BASIX optional development, does not apply to the development application.</p> <p>Meanwhile, Chapter 3 outlines sustainability standards for non-residential development that involves—</p> <ul style="list-style-type: none"> <li>the erection of a new building, if the development has a capital investment value of \$5 million or more, or</li> <li>alterations, enlargement or extension of an existing building, if the development has a capital investment value of \$10 million or more.</li> </ul> <p>This DA is accompanied by a Cost Summary Report (<b>Appendix G</b>) confirming that the Proposal's EDC is below \$5 million. Therefore, the standards outlined in Chapter 3 do not apply.</p>

## 5.2.2 Narrandera Local Environmental Plan 2013

The *Narrandera Local Environmental Plan 2013* (**Narrandera LEP**) is the principal guiding EPI relevant to the site and establishes the key parameters and standards for new development. The Proposal's consistency with the relevant clauses of the Narrandera LEP is assessed below in **Table 4**.

**Table 4 Assessment against Narrandera Local Environmental Plan 2013**

Clause	Provision / Standard	Proposal
<p><b>Clause 2.3</b></p> <p><i>Zone objectives and land use table</i></p>	RU5 Village	<p><b>Complies</b></p> <p>As outlined in <b>Section 5.4.1</b>, the development of Key health care worker accommodation at the site is permissible with consent for the following reasons.</p> <ul style="list-style-type: none"> <li>Key health care worker accommodation is defined as a '<b>hospital</b>' under the Standard Instrument as it is accommodation for nurses that is ancillary to a place used for professional health care services (the Narrandera District Hospital).</li> <li>A '<b>hospital</b>' is a land use sub-category of '<b>health services facility</b>'.</li> <li>The 'RU5 Village' zone is a prescribed zone under Section 2.59 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP).</li> <li>The development of a '<b>health services facility</b>' is permitted with consent in a prescribed zone under Section 2.60(1) of the TISEPP.</li> </ul> <p>The Proposal meets the zone's objective as it delivers housing that will meet the needs of health care workers, thus supporting Narrandera District Hospital's services for the local community.</p>
<p><b>Clause 4.3</b></p> <p><i>Height of buildings</i></p>	<b>N/A</b> – No height of building control applies to the site. Instead, <b>Section 5.4.2</b> presents an assessment of the Proposal's built form.	
<p><b>Clause 4.4</b></p> <p><i>Floor space ratio</i></p>	<b>N/A</b> – No floor space control applies to the site. Instead, <b>Section 5.4.2</b> presents an assessment of the Proposal's built form.	
<p><b>Clause 5.10</b></p> <p><i>Heritage Conservation</i></p>	<p><b>Complies</b></p> <p>As presented in <b>Section 3.2</b>, part of the site is mapped as a local heritage item described as 'Narrandera District Hospital Group' under Schedule 5 of the <i>Narrandera Local Environmental Plan 2013</i>. The proposed location for the accommodation is outside the part of the site mapped as a heritage item.</p> <p>As presented in <b>Section 5.4.4</b>, the Proposal will not impact the heritage item's significance as the works are approximately 17m north of the item's heritage curtilage.</p>	
<p><b>Clause 5.21</b></p> <p><i>Flood planning</i></p>	<b>N/A</b> – The site is <b>not</b> identified within a Flood Planning Area on the Flood Planning Map.	

Clause	Provision / Standard	Proposal
<b>Clause 6.3</b> <i>Stormwater management</i>	<b>Complies</b>	<p>Clause 6.3 states that development consent must not be granted unless the proposed development is:</p> <ul style="list-style-type: none"> <li>designed to maximise the use of water permeable surfaces.</li> <li>includes, if practicable, on-site stormwater retention.</li> <li>avoids or reasonably minimises and mitigates any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters.</li> </ul> <p>This DA is accompanied by Civil Plans prepared by Kehoe Myers that illustrate the accommodation's proposed stormwater system. The accommodation units will be connected to the site's existing stormwater system via new stormwater drainage to manage runoff appropriately. The Proposal also retains large areas of permeable surfaces surrounding the accommodation units.</p>
<b>Clause 6.4</b> <i>Terrestrial Biodiversity</i>	<b>N/A</b>	The site is <b>not</b> identified as containing 'biodiversity' on the Terrestrial Biodiversity Map.
<b>Clause 6.5</b> <i>Groundwater Vulnerability</i>	<b>N/A</b>	The site is <b>not</b> identified as 'groundwater vulnerable' on the Groundwater Vulnerability Map.
<b>Clause 6.6</b> <i>Riparian land and watercourses</i>	<b>N/A</b>	The site is <b>not</b> identified as containing a 'watercourse' or being within 40m to the top of the bank of a watercourse on the Watercourse Map.
<b>Clause 6.7</b> <i>Wetlands</i>	<b>N/A</b>	The site is <b>not</b> identified as containing 'wetland' on the Wetlands Map.
<b>Clause 6.8</b> <i>Salinity</i>	<b>N/A</b>	The site is <b>not</b> identified as containing 'saline land' on the Salinity Map.
<b>Clause 6.13</b> <i>Essential services</i>	<b>Complies</b>	<p>Clause 6.13 states that a consent authority must not grant development consent unless it is satisfied that essential services are available or adequate arrangements have been made to make them available. As outlined in <b>Section 4.4</b>, Once the modular units are placed, they will be connected to essential services, including electricity, water, and stormwater.</p>

### 5.3 Development Control Plans

In accordance with Section 4.15(1)(a)(iii) of the EP&A Act the proposed development considers and is consistent with the objectives of the *Narrandera Development Control Plan 2013* (**Narrandera DCP**) and the relevant development controls. As required under Section 4.15(3A) of the EP&A Act, a consent authority is required to apply DCP provisions flexibly and allow reasonable alternative solutions that achieve the objects of those standards.

**Table 5** presents the Proposal's compliance with the Narrandera DCP.

**Table 5** *Compliance with Narrandera DCP 2013*

Section	Control	Comments/Proposal
<b>Part C Controls that apply to all development</b>		
6.2.1	Car parking design standards	<b>Complies</b> The Proposal will utilise existing parking spaces within the site's northern car park. Vehicles can access and leave the car park in a forward direction.
6.2.2	Car parking provision	<b>Complies</b> Staff living in the proposed accommodation will utilise existing parking spaces in the car park adjacent to the accommodation. The accommodation will generate no additional demand for on-site parking as the existing Hospital contains parking for these staff who would otherwise live in accommodation off-site and drive to work.

Section	Control	Comments/Proposal
<b>Part D Rural, residential, business and industrial controls</b>		
<p>As outlined in <b>Section 5.4.1</b>, the Proposal's land use is defined as a '<b>hospital</b>' and not a form of '<b>residential accommodation</b>' under the Standard Instrument. Nevertheless, the following section assesses the Proposal's compliance against the related controls of Part D that apply to multi-dwelling housing, given that this land use is the most comparable type of residential accommodation to the Proposal.</p>		
8.4.1	Neighbourhood character and design response	<p><b>Variation</b></p> <p>The proposed units are not laid out in the typical grid fashion that characterises much of Narrandera. However, this is considered acceptable for the following reasons.</p> <ul style="list-style-type: none"> <li>• The proposed units are significantly removed from the nearest primary street frontage (Adams Street) by approximately 90m. There are also established tree plantings between the accommodation and the street. Therefore, the units will not visually detract from or alter the established character of nearby streets.</li> <li>• The proposed units are single-storey, which complements Narrandera's established low-density character. They also benefit from good access to open space and sunlight.</li> <li>• The proposed accommodation is unique because it is intended for health care workers and is located on a hospital campus. As such, the accommodation will appear as part of the campus rather than part of the surrounding residential neighbourhood.</li> </ul>
8.4.2	Front building setbacks and streetscape	<p><b>Complies</b></p> <p>The proposed units are sited more than 5m from the nearest street frontage. As discussed, given their separation and the presence of surrounding established tree plantings, the units will not visually detract from or alter the established character of nearby streets.</p>
8.4.3	Side and rear building setbacks	<p><b>Complies</b></p> <p>The proposed units are sited more than 3m from the nearest street frontage and more than 5m from the rear property boundary.</p>
8.4.4	Height limits	<p><b>Complies</b></p> <ul style="list-style-type: none"> <li>• The Proposal does involve more than 900mm of cut and/or fill.</li> <li>• The proposed units are single-storey structures.</li> </ul>
8.4.5	Site coverage	<p><b>Complies</b></p> <p>The proposed units occupy less than 60% of Lot 3 DP 129211. Moreover, the proposed units do not appear to be overly densely developed when viewed in the context of the surrounding open space on the hospital campus.</p>
8.4.6	Open space provision	<p><b>Complies</b></p> <ul style="list-style-type: none"> <li>• Each unit features a minimum open space area of 4m x 6m that is directly accessible from the main living area.</li> <li>• More than 20% of Lot 3 DP 129211 is soft cover capable of absorbing rain.</li> </ul>
8.4.7	Solar access and protection	<p><b>Complies</b></p> <ul style="list-style-type: none"> <li>• More than 50% of each unit's open space receives a minimum of three hours of solar access between 9 am and 1 pm during the winter solstice.</li> <li>• The units do not cause overshadowing to neighbouring properties between 9 am and 1 pm during the winter solstice.</li> <li>• The proposed units have been designed and sited to benefit from cross ventilation.</li> </ul>
8.4.8	Privacy	<p><b>Complies</b></p> <p>The proposed units are single-storey and located some 17m from the nearest hospital building on site and 26m from the nearest building on the TAFE site to the north. There are no nearby neighbouring residential buildings. Therefore, the units are sufficiently removed from other uses so as not to cause adverse privacy impacts.</p>
8.4.9	Fencing	<p><b>Variation</b></p>

Section	Control	Comments/Proposal
		The Proposal involves the erection of a 1.5m high aluminium permeable fence around each unit's front yard to delineate between private and public space. While this fencing is metal and exceeds 1200m, it is considered acceptable, given that the units (and associated fencing) are sufficiently removed from nearby streets and are surrounded by screening vegetation so as not to affect the neighbourhood's existing architectural character.
8.4.10	Landscaping	<b>Complies</b> The DA is accompanied by a Landscape Plan prepared by Agla that significantly increases the number of tree plantings surrounding the development to provide shade cover ( <b>Appendix B</b> ).
8.4.11	Off-street parking	<b>Complies</b> The proposed units will utilise existing parking spaces in the northern carpark.
8.5	Internal access standards for all ages	<b>Complies</b> One of the proposed units is an accessible dwelling.
<b>Part E Natural Hazards</b>		
12	Bushfire Prone Land	<b>Complies</b> The DA is accompanied by a Bushfire Assessment that assesses the Proposal against the provisions of <i>Planning for Bushfire Protection</i> and confirms compliance subject to the implementation of bushfire control measures (refer to <b>Section 5.4.5</b> ).
<b>Part G Heritage Controls</b>		
15.2	Statement of significance – local heritage items	<b>Complies</b> Part of the site is mapped as a local heritage item described as "Narrandera District Hospital Group". The DCP describes the item's heritage significance as follows:  <i>The original 1885 hospital building is constructed of red brick with bracketed eaves and two projecting faceted bays and a central entrance portico. Over the years other buildings have been added to the site and in the 1990's extensive work was done to 'modernise' the hospital. The Victorian buildings in the hospital complex are of significance as they are some of the earliest in Narrandera and are locally rare examples of a type.</i>  As outlined in <b>Section 5.4.4</b> , the Proposal will not impact the Hospital's heritage significance as the works are approximately 17m north the item's identified heritage curtilage.

## 5.4 Key Issues and Likely Impacts

This section details the key planning issues and likely environmental, social, and economic impacts of the development on the natural and built environment in accordance with Section 4.15(1)(b) of the EP&A Act.

### 5.4.1 Permissibility

The following section sets out the Proposal's permissibility.

As quoted below, the land use definition of a '**hospital**' under the Standard Instrument includes accommodation for nurses or other health care workers that is ancillary to a building or place used to provide professional health care services.

**hospital** means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following—

...

(b) accommodation for nurses or other health care workers.

[emphasis added]

The proposed accommodation will be used to house health care workers and is ancillary to the Narrandera District Hospital, which is a place used to provide professional health care services. Therefore, the accommodation is defined as '**hospital**'. A '**hospital**' is listed as a land use sub-category of '**health services facility**' under the Standard Instrument.

Section 2.59 of the TISEPP identifies land use zones that are 'prescribed zones' for the purpose of Section 2.60 of the SEPP. The 'RU5 Village' land use zone, which applies to the site, is identified as a prescribed zone.

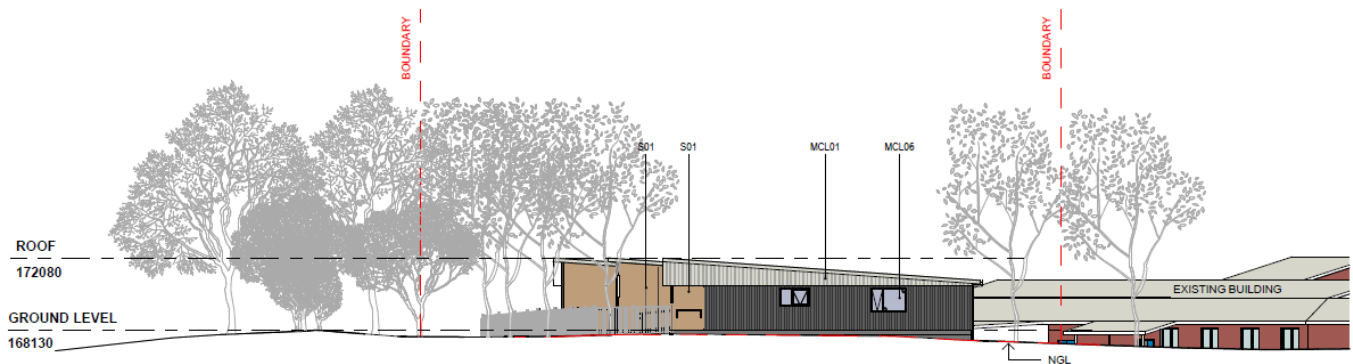
Section 2.60 of the TISEPP states that development for the purpose of a '**health services facility**' is permissible with consent in a prescribed zone. Therefore, the Proposal is permissible with consent as it seeks approval for a '**health services facility**' in a prescribed zone.

#### 5.4.2 Built Form

The proposed units' siting and built form were carefully designed to consider the site's heritage features, complement the site's surrounding context, and provide visual and acoustic privacy. The result is a built outcome that is sympathetic to the site's surrounding character, as shown in the Architectural Plans included in **Appendix A** and described below.

##### Building Height

The proposed units are single-storey and have a maximum height of 4.3m, well below the maximum two-storey-built form stipulated in the Narrandera DCP. The units' single storey-built form, combined with the 17m of separation to the nearest hospital building on site and 26m from the nearest neighbouring building on the TAFE site to the north, ensure that the homes do not visually dominate or cause adverse overshadowing impacts to nearby development. The single-storey height also complements the scale of existing nearby hospital building (refer to **Figure 10**).



**Figure 10 Proposed Western Elevation**

Source: Kearney Architecture

##### Setbacks

The proposed units are situated at the hospital site's rear and feature generous setbacks to all property boundaries with neighbouring developments. Its minimum setback is approximately 10m to the northern shared property boundary with the TAFE campus. The proposed setbacks are considered acceptable as:

- They ensure adequate building separation with neighbouring properties to protect visual and acoustic privacy.
- They provide adequate space for landscaping.
- They do not create an unreasonable sense of enclosure.

### 5.4.3 Traffic and Parking

#### Parking

As outlined in **Section 3.2**, the hospital site contains four parking areas, including a car park adjacent to the proposed accommodation. This car park is accessed from Dixon Place and contains 20 parking spaces, including two accessible parking spaces. There are also on-street perpendicular parking spaces available along Douglas Street.

Staff living in the proposed accommodation will utilise existing parking spaces in the adjacent car park. The accommodation will generate no additional demand for on-site parking as these staff would otherwise live in accommodation off-site and drive to work.

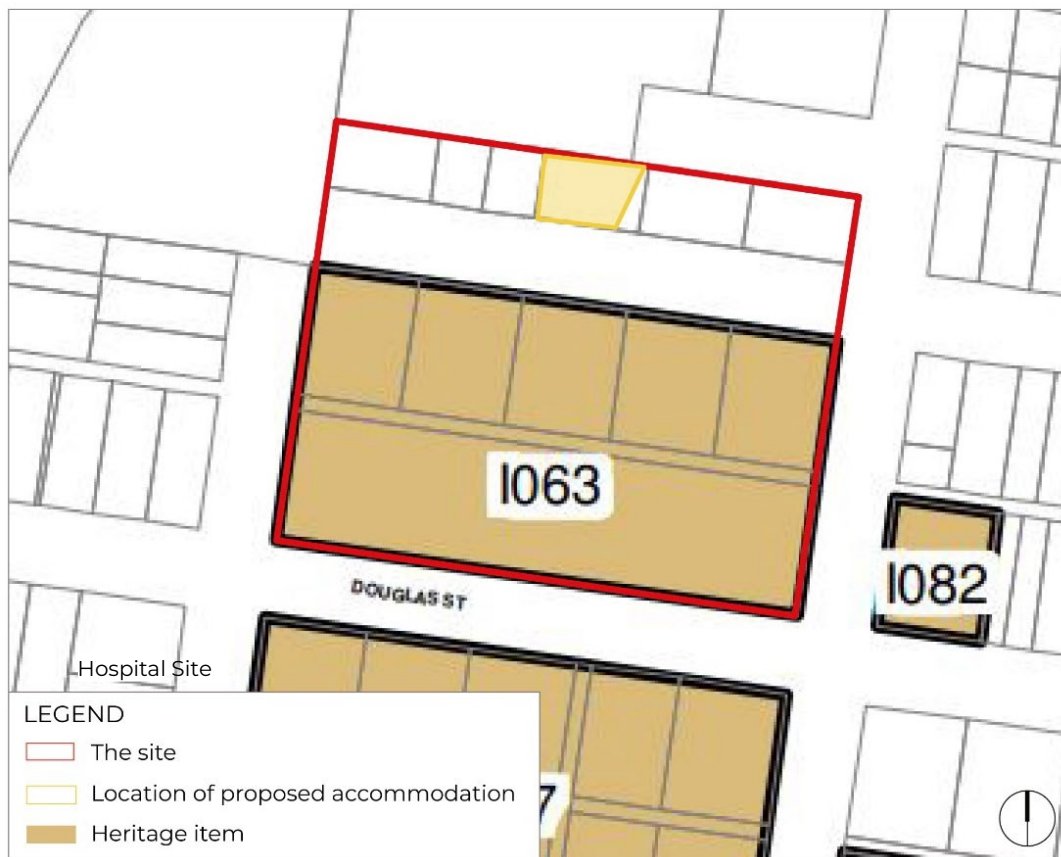
Therefore, as the Proposal does not involve deleting existing parking spaces or constructing new parking spaces, it will not impact total parking demand and peak occupancy of the Narrandera District Hospital's car parks.

#### Traffic Impacts

The Proposal will moderately reduce total vehicle trips associated with the hospital, as staff who originally drove to work can now walk to work instead. As such, the Proposal will have a negligible (albeit positive) impact on the performance of the surrounding road network.

### 5.4.4 Heritage

As illustrated in **Figure 11**, part of the hospital site is mapped as a local heritage item, described as 'Narrandera District Hospital Group' under Schedule 5 of the Narrandera LEP 2013 (I063). The location for the proposed accommodation is outside the part of the site mapped as a heritage item.



**Figure 11** Heritage Mapping

Source: Narrandera LEP 2013

The Proposal will not adversely impact the item's heritage significance for the following reasons.

- The proposed accommodation is situated approximately 17m outside the Narrandera District Hospital Group's heritage curtilage.
- The Proposal will not impact significant fabric or result in changes to the buildings and associated plantings identified in the heritage-listed site.

- The Proposal will impact no known archaeological deposits.

### 5.4.5 Bushfire

As outlined in **Section 3.2**, most of the hospital site is identified as either 'Category 1 bushfire prone land' or 'vegetation buffer'. The location for the proposed accommodation is identified as 'vegetation buffer' land. Accordingly, this DA is accompanied by a Bushfire Assessment prepared by Peterson Bushfire (**Appendix D**) that assesses the Proposal against the relevant requirements in the *Planning for Bush Fire Protection 2019 (PBL)*. The Assessment's findings are presented below.

#### Existing Bushfire Hazard

The Bushfire Assessment identifies the extent of bushfire hazards at the hospital site to determine the required application of bushfire protection measures, including Asset Protection Zones (APZ) and Bushfire Attack Level construction requirements.

As illustrated in **Figure 12**, the 'predominant vegetation' influencing fire behaviour at the hospital site is semi-arid woodland within the site's northwestern margins. A mown edge clearly defines the woodland hazard. This area also features an 'effective slope' classified as a 'downslope 0-5 degrees'.



**Figure 12 Bushfire Hazards**

Source: Peretson Bushfire



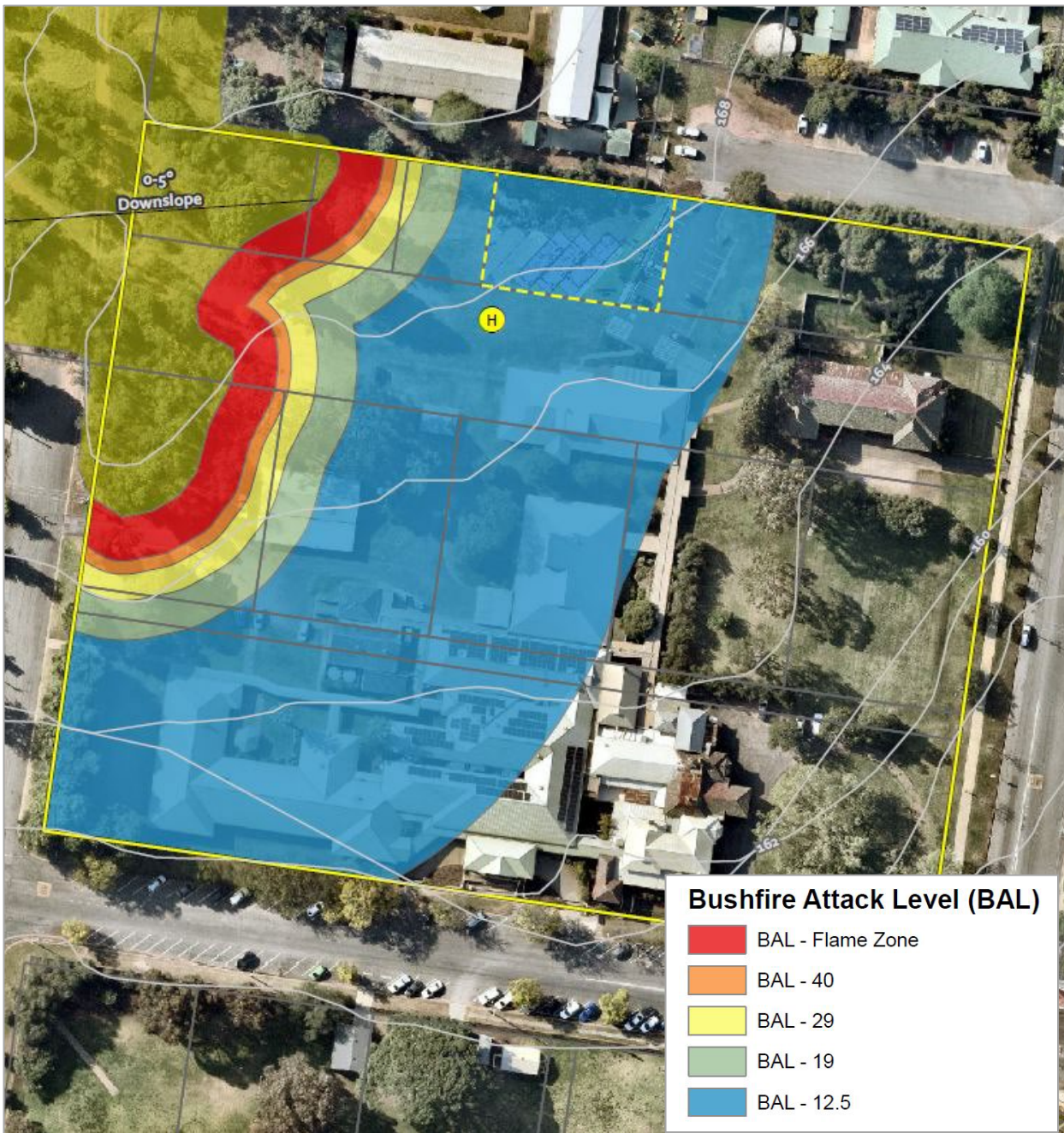
## Bushfire Protection Measures

### Asset Protection Zone

Using the identified hazard parameters of 'predominant vegetation' and 'effective slope' discussed above, the Bushfire Assessment determines that the Proposal requires a minimum APZ of 13m between the proposed buildings and the bushfire hazard. As illustrated in **Figure 12**, the site features an existing APZ that significantly exceeds the 13m requirement without needing tree or vegetation removal. The Bushfire Assessment notes that this existing APZ, which comprises a mowed area between the building and woodland, must continue to be maintained by mowing.

### Bushfire Attack Level (BAL)

Using the identified hazard parameters, the bushfire assessment determines that the proposed accommodation and associated decking and stairs must be constructed in accordance with the standards for BAL-12.5 (refer to **Figure 13**).



**Figure 13** Hospital Site's Bushfire Attack Levels

Source: Peterson Bushfire

## Access, Utilities and Emergency Management

The Bushfire Assessment reviews the hospital's existing access and utility supply arrangements (including water supply) and confirms compliance with the relevant requirements of the PBL.

The Bushfire Assessment recommends preparing (or updating) a 'Bushfire Emergency Management and Evacuation Plan' for the new accommodation before the units are occupied.

### Conclusion

The Bushfire Assessment concludes that the Proposal can comply with the PBL, subject to the implementation of the bushfire protection measure outlined above.

### 5.4.6 Contamination

The DA is accompanied by a Preliminary and Detailed Site Investigation prepared by JK Geotechnics (**Appendix F**). The Detailed Site Investigation (**DSI**) analysed soil sampling from six test pits. That testing identified Heptachlor in fill soil above the health-based criteria in one location. The DSI considers that in the current site configuration, whilst the area remains grassed and the soils remain undisturbed, the risks associated with exposure to Heptachlor in soil would be acceptable.

Nevertheless, the DSI states that remediation of the site through a Remediation Action Plan is required to address the contamination in fill soil. It notes that remediation of the contaminant of concern in fill is considered to be straightforward and that the site can be made suitable for the proposed development via remediation.

Accordingly, the development application is accompanied by a Remediation Action Plan (**Appendix F**).

## 5.5 Other Impact of the Development

An assessment of the other impacts of the development have been undertaken by the relevant specialist consultants and are appended to this SEE as set out in **Table 6** below.

**Table 6 Other Matters for Consideration**

Consideration	Summary	Reference
Waste	<p>The DA is accompanied by a Construction Waste Management Plan prepared by Hutchinson Builders, outlining waste management measures to implement during the construction stage.</p> <p>The Proposal involves installing modular buildings, which reduces pollution and waste generated on-site. It also reduces the overall waste associated with the development, as the construction of modular buildings within a factory environment allows for the streamlining of materials usage.</p> <p>During the construction works on-site, the Principal Contractor will be required to ensure that the measures outlined in the Waste Management Plan are implemented, including those that encourage the avoidance, reduction, and reuse of waste. Where waste cannot be reused, recycled, or processed, it will be classified using the NSW EPA's Waste Classification Guidelines and appropriately disposed of in accordance with the <i>Protection of the Environment Operations Act 1997</i>.</p>	<b>Appendix E</b>
Noise	<p>The proposal is not anticipated to generate adverse noise impacts, given:</p> <ul style="list-style-type: none"> <li>The accommodation is approximately 17m from the nearest hospital building on site and 26m from the nearest building on the TAFE site to the north.</li> <li>The accommodation is for staff working at the hospital, and the construction is for a low volume of residential occupancy, which does not generate significant on-site noise emissions.</li> </ul>	-
Ecology	As noted in <b>Section 3.2</b> , the proposed location for the accommodation does not require the removal of trees to facilitate the development. Indeed, the Proposal will have a positive ecological	-

Consideration	Summary	Reference
	impact by significantly increasing the number of tree plantings in the hospital site's northern portion, as presented in <b>Section 4.7</b> .	
Construction Impacts	<p>The Proposal's construction impacts are not anticipated to significantly adversely impact the hospital's existing functions or neighbouring development for the following reasons.</p> <ul style="list-style-type: none"> <li>The proposed works will not affect the hospital's public-facing functions, which are located further south on the hospital campus.</li> <li>The construction works are expected to be completed within a six-month timeframe.</li> <li>The building contractor will develop a Construction Management Plan that includes measures to minimise waste, dust and noise nuisance.</li> </ul> <p>Once installed, the key health care worker accommodation will support the function of the Narrandera District Hospital by helping attract and retain hospital staff.</p>	-

## 5.6 Social and Economic Impacts in the locality

The proposed development will provide social and economic value for Narrandera and the broader community. The following positive social and economic impacts are of note:

- The Proposal will deliver safe, accessible key health care worker accommodation that will help attract and retain staff at the Narrandera District Hospital, thus supporting the hospital's function.
- The Proposal provides a secure supply of housing for healthcare workers that is not affected by external demand pressures in the general rental housing market.
- The Proposal will provide a source of short-term construction employment in Narrandera.

## 5.7 Site Suitability

In accordance with Section 4.15(1)(c) of the EP&A Act, the site is considered to be suitable for the proposed development for the following reasons:

- As outlined in the **Section 5.4.5**, the hospital site's bushfire hazards can be appropriately managed. Other hazards and constraints, such as flooding, wetlands, riparian land, watercourses, terrestrial biodiversity, threatened species, and steep topography, do not encumber the site.
- The site contains an existing hospital campus (Narrandera District Hospital), and thus, the key health care worker accommodation complements the site's function and character.
- The site's size enables the Proposal to incorporate generous setbacks to mitigate impacts to neighbouring development.
- The Proposal can be undertaken with development consent and complies with relevant development standards.

## 5.8 Public Interest

In accordance with Section 4.15(1)(e) of the EP&A Act, the proposed development is considered to be in the public interest for the following reasons:

- The Proposal will deliver safe, accessible key health care worker accommodation that will help attract and retain staff at the Broken Hill Hospital, thus supporting the hospital's function.
- The proposed units are approximately 17m from the heritage curtilage of the Narrandera District Hospital Group heritage item. Therefore, they won't affect the item's heritage significance.
- The Proposal will not result in additional adverse impacts and, in some cases, such as a significant increase in tree plantings and a minor reduction in traffic generation, will improve the hospital site's environmental impacts.
- The Proposal has been carefully designed with regard to its surrounding context and features. Specifically,

- The units are single-storey and located approximately 90m from the nearest primary street frontage (Adams Street), 17m from the nearest hospital building on site, and 26m from the nearest building on the TAFE site to the north. There are also established tree plantings between the accommodation and nearby streets. Therefore, the units are sufficiently separated to avoid adverse acoustic, overshadowing, visual, or privacy impacts on neighbouring development.
- The proposed units are single-storey, which complements Narrandera's established low-density character. They also benefit from good access to open space and sunlight.
- The proposed units include sustainability initiatives, including water and energy-efficient fixtures and fittings, passive heating, and cooling design features, and they are solar-ready.
- The DA provides a temporary source of local construction employment.
- The Proposal is permissible with consent and complies with the relevant provisions of the *Narrandera Local Environmental Plan 2013* and the *Narrandera Development Control Plan 2013*.

## 6.0 Conclusion

The proposed development seeks approval to install key health care worker accommodation within the Narrandera District Hospital at 54-64 Adams Street, Narrandera.

This SEE has provided a detailed assessment of the Proposal against the relevant matters under Section 4.15(1) of the EP&A Act. The application is recommended for approval given the following reasons:

- The Proposal is in the public interest as it provides critically needed housing to help attract and retain health workers at the Narrandera District Hospital. This supports the overall health and well-being of the local community, particularly as the Narrandera Shire has an ageing population.
- The Proposal provides a secure housing supply for health care workers unaffected by external demand pressures in the general rental housing market.
- The proposed accommodation is within walking distance of the Narrandera Town Centre and features good access to facilities and services.
- The site is suitable for the proposed development as:
  - The site's bushfire hazards can be appropriately managed, as outlined in **Section 5.4.5**. The site is not encumbered by other hazards and constraints such as flooding, wetlands, riparian land, watercourses, terrestrial biodiversity, threatened species and steep topography.
  - The site contains an existing hospital campus (Narrandera District Hospital), and thus, the key health care worker accommodation complements the site's function and character.
  - The site's size enables the Proposal to incorporate generous setbacks to mitigate impacts to neighbouring development.
- The Proposal's environmental impacts are minimal and acceptable. In particular:
  - The units are single-storey and located approximately 90m from the nearest primary street frontage (Adams Street), 17m from the nearest hospital building on site, and 26m from the nearest building on the TAFE site to the north. Therefore, the units are sufficiently separated to avoid adverse acoustic, overshadowing, visual, or privacy impacts on neighbouring development.
  - The proposed units are approximately 17m from the heritage curtilage of the Narrandera District Hospital Group heritage item. Therefore, they won't affect the item's heritage significance.
  - The Proposal will increase the number of trees in the hospital site's northern portion.
  - The Proposal will moderately reduce the total number of vehicle trips associated with the hospital, as staff who originally drove to work can now walk to work instead. As such, the Proposal will have a negligible (albeit positive) impact on the performance of the surrounding road network.
- The proposed units include sustainability initiatives, including water and energy-efficient fixtures and fittings, passive heating, and cooling design features, and they are solar-ready.
- The DA provides a temporary source of local construction employment.
- The Proposal is permissible with consent and complies with the relevant provisions of the *Narrandera Local Environmental Plan 2013* and the *Narrandera Development Control Plan 2013*.