

**RESPONSE TO SUBMISSIONS REPORT  
SHOALHAVEN HOSPITAL REDEVELOPMENT  
SSD DA 35999468**

**PART A – MAIN REPORT**



**Prepared on behalf of Health Infrastructure**



**December 2022**

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Date: 20 December 2022

## **RESPONSE TO SUBMISSIONS REPORT PART A – MAIN REPORT**

### **SSD DA 35999468 SHOALHAVEN HOSPITAL REDEVELOPMENT SHOALHAVEN STREET, NOWRA**

#### **1.0 INTRODUCTION**

I act for the applicant (Health Infrastructure) in respect of the current SSD DA for the Shoalhaven Hospital Redevelopment (SSD 35999468) at Shoalhaven Street, Nowra and provide a response to submissions (RtS) arising from the public exhibition of the DA in September / October 2022.

Agency submissions were received from the following:

- Department of Planning and Environment (Biodiversity and Conservation Division)
- Department of Planning and Environment (Water)
- Heritage NSW
- Endeavour Energy
- Civil Aviation Safety Authority (CASA)
- Transport for NSW
- Shoalhaven City Council

The Department has also provided a summary of key issues as per its letter dated 1 November 2022.

One public submission was received from what is understood to be an adjacent neighbour of the hospital (Timothy New).

The response to these submissions is set out below in Section 4.0 of this report and is supported by the following documentation for the Department's consideration and assessment:

- **Appendix A** – Submissions Register (as embedded within Part B of this response)
- **Appendix B** – Updated Mitigation Measures (\_planning)
- **Appendix C** – Architectural drawings setting out setbacks and drop-off area to Shoalhaven Street (Conrad Gargett and TTW)
- **Appendix D** – Preliminary Green Travel Plan (TTW)
- **Appendix E** – Updated swept path diagram (TTW)

These documents form part of Part B to this response.

#### **2.0 ANALYSIS OF SUBMISSIONS**

The range of issues raised in submissions can be broadly grouped into the following:

- Parking supply and demand at and around the hospital, including increased use of available parking within the hospital.
- Increased mode share towards active and public transport.
- Development of a Green Travel Plan for the hospital.
- General traffic management matters.
- Civil Engineering and water management matters.
- Potential for groundwater impacts and requirement for a water management plan during construction.
- Protection, although limited and unlikely, of any unforeseen Aboriginal cultural heritage during construction.
- Biodiversity matters.

- Procedures and approvals for the proposed water mains relocation and water and sewer supply to the hospital arising from the development.
- Procedures and approvals for electricity supply to the hospital arising from the development.
- Architectural clarifications.
- General timing and staging matters.

Many of the submissions provided routine commentary, reiterated matters already subject of the assessment in the EIS and its specialist reports, or provided suggested draft conditions of consent.

A submissions register is provided at **Appendix A** as embedded within Part B of this RtS. The updated Mitigation Measures are provided as **Appendix B**.

### 3.0 ACTIONS TAKEN SINCE EXHIBITION

HI and the project team have regular monthly meetings with Shoalhaven City Council to discuss a range of matters related to the project. Since the close of exhibition (and Council's submission) there has been a further meeting held on 22 November 2022.

Additionally, a meeting was held with Shoalhaven City Council and TfNSW on 30 November 2022 to discuss the proposed response to submissions package as it relates to the local and regional traffic, transport and parking matters in the submissions of each body.

Generally, the discussion retraced existing commentary around on- and off-site parking supply and demand; the timing for full occupancy of the Acute Services Building and the progressive change in new parking demand; the development of a Green Travel Plan to seek to change travel behaviour for existing use of the hospital and during the maturation of the project; and ways to enhance use of existing parking facilities of the hospital.

Furthermore, the design and consultant team has worked to address key issues with updated drawings and commentary as set out herein and as appended.

### 4.0 RESPONSE TO DPE KEY ISSUES AND AGENCY AND COUNCIL SUBMISSIONS

#### 4.1 Department of Planning & Environment Key Issues

The following sets out our response to the Department's key issues as included in its letter dated 1 November 2022.

Issue	Response
<b>Architectural Plans</b>	
Provide proposed setback distances of the building to Shoalhaven Street.	<p>These were included in the Architectural Design Statement lodged with the DA – see page 51. The setback distances from Shoalhaven Street were variously shown as 9.966m at the northernmost extremity of the Acute Services Building frontage to the street and then progressively moving south, at 10.429m, 10.437m, and 19.1m from the property boundary to the face of the building at its lowest / street level.</p> <p>Notwithstanding, Conrad Gargett has also supplied a suite of drawings (plans and elevations) showing the calculated setbacks off Shoalhaven Street. As above, these vary between 9.038m, 10.429m, 10.437m, and 19.100m at ground level, and 9.038m and 9.966m at upper levels in various locations.</p> <p>These are provided as part of <b>Appendix C</b>. Note that no other design changes have been made to these drawings other than adding boundary dimensions.</p> <p>The relevant drawings are: ASB-TD-DR-AR-SK00004-2 ASB-TD-DR-AR-SK00005-2</p>

ASB-TD-DR-AR-SK00014-2 ASB-TD-DR-AR-SK00017-2	
<b>Timing of works</b>	
<p>Part 7.18.3 (page 203) of the EIS states that the relocation of the Shoalhaven Community Pre School and the temporary relocation of the hospital's helipad would both need to be completed and operational before the commencement of the proposed development.</p> <p>Advise what mechanism is proposed to manage/implement the timing as described to ensure that construction related impacts are minimised.</p>	<p>The pre-School is presently under construction and planned to be completed by June 2023. Once operational, this allows the relevant phase of the demolition works to occur in the existing pre-school location.</p> <p>The temporary helipad and its relocation is remote from the hospital and its construction. The scope of works for the helipad are modest and able to be completed within an estimated 2 months. It is assumed the temporary helipad would be operational by July 2023 at the very latest.</p> <p>The indicative schedule is:</p> <ul style="list-style-type: none"> <li>- Acute Services Building construction commencement March 2023.</li> <li>- Pre-school completion June 2023.</li> <li>- Temporary Helipad completion July 2023.</li> </ul>
<b>State Design Review Panel (SDRP)</b>	
<p>Page 39 of the Architectural Design Report states that, in response to design issues raised by the SDRP, alternative options for the Shoalhaven Street drop-off are being explored to maximise landscaping to the streetscape.</p> <p>Provide details of the options explored in this respect.</p>	<p>Conrad Gargett has reviewed this comment and advised as follows, and as attached as part of <b>Appendix C</b>.</p> <p>The alternate option that was explored in response to the SDRP comments is shown in the document titled 'Shoalhaven St Drop-off Options' at <b>Appendix C</b>.</p> <p>The minimal increase in landscaped area did not justify the loss of amenity in the drop off area.</p> <p>A road is still required to access the mortuary garage. Hardstand is required for a crane lifting area for plant equipment replacement.</p> <p>Public amenity is compromised with the drop off being further from the entry and closer to road traffic. Undercover access from the drop off would result in an awning structure close to the site boundary.</p> <p>The SDRP was comfortable with the way the drop off design was developed in the following meeting and agreed it was the preferred solution.</p>

## 4.2 Agency, Council and Public Submissions

The following sets out our response to the Agency and Council submissions received by the Department, as well as the single public submission.

Department of Planning and Environment (Biodiversity and Conservation Division - BCD)	
Issue	Response
<b>Biodiversity Considerations</b>	
BCD have reviewed the EIS and the relevant attachments (ie the BDAR and the Stormwater and Flooding report) and provide the following information for your consideration:	See below.
The BDAR has considered the relevant biodiversity considerations for the site, noting the hollow bearing trees and the identified large Blackbutt tree will be retained. Any removal of other native species will be replaced with other local native vegetation.	Noted, and as per the planting schedule set out in the EIS and the Landscape documentation. Note, tree replacement is at a replacement ratio of 2.5:1.

The flooding issues have been considered as per our previous advice provided for the SEARs (Feb 2022) regarding the PMF extents, and that designs consider overland flow through the site and ensure access is possible to the highway via southern and eastern routes.	Noted.
<b>Endeavour Energy</b>	
<b>Issue</b>	<b>Response</b>
The applicant will need to complete the application for connection of load process with Endeavour Energy's Customer Network Solutions Branch who are responsible for managing the conditions of supply with the applicant and their Accredited Service Provider (ASP) and can be contacted via Head Office enquiries on business days from 9am - 4:30pm on telephone: 133 718 or (02) 9853 6666 or by email <a href="mailto:cicadmin@endeavourenergy.com.au">cicadmin@endeavourenergy.com.au</a>	Noted.
The applicant will need to make contact if this Development Application: <ul style="list-style-type: none"> <li>• Includes any contestable works projects that are outside of any existing approved / certified works.</li> <li>• Results in an electricity load that is outside of any existing Supply / Connection Offer requiring the incorporation of the additional load for consideration.</li> </ul>	Noted.
For further advice the applicant can call Endeavour Energy via Head Office enquiries on business days from 9am - 4:30pm on telephone: 133 718 or (02) 9853 6666 and the following contacts: <ul style="list-style-type: none"> <li>• Easements Officers for matters related to easement management or protected works / assets.</li> </ul> <p>Alternatively contact can be made by email <a href="mailto:Easements@endeavourenergy.com.au">Easements@endeavourenergy.com.au</a> .</p> <p>As previously advised, if any proposed works or activities (other than those approved / certified by Endeavour Energy's Network Connections Branch as part of an enquiry / application for load or asset relocation project) will encroach / affect Endeavour Energy's easement, contact must first be made with the Endeavour Energy's Easements Officer.</p> <ul style="list-style-type: none"> <li>• Property Branch for matters related to property tenure. Alternatively contact can be made by email <a href="mailto:network_property@endeavourenergy.com.au">network_property@endeavourenergy.com.au</a> (underscore between 'network' and 'property').</li> <li>• Field Operations Branch for safety advice for building or working near electrical assets in public areas. The site is in the area covered by Nowra Field Service Centre. Alternatively contact can be made by email <a href="mailto:Construction.Works@endeavourenergy.com.au">Construction.Works@endeavourenergy.com.au</a> .</li> </ul>	Noted.
Subject to the foregoing Endeavour Energy has no objection to the Development Application.	Noted.
<b>Heritage NSW</b>	
<b>Issue</b>	<b>Response</b>
We note that Aboriginal community consultation has been completed in accordance with the SEARs and the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW2010) (ACHCRs). No cultural heritage values were identified within the area of the proposed development, and the Registered Aboriginal	Noted.



Parties have not expressed any objections to the development.	
No Aboriginal objects are present within the land of the proposed development, and Eco Logical has assessed the study area has low archaeological potential due to moderate to high levels of previous ground disturbance.	Noted.
While the proposed development appears to have low potential to impact on Aboriginal cultural heritage, we support raising the cultural awareness of contractors working on site. We also provide the following recommendations:	See below.
Any Aboriginal cultural heritage awareness inductions would benefit from the involvement of Aboriginal community representatives	Noted. HI would support inclusion of a suitably worded condition.
An Unexpected Finds Protocol for Aboriginal objects needs to be included as part of any Construction Environmental Management Plan (CMP) prepared for the development works.	Noted. HI would support inclusion of a suitably worded condition.
<b>Civil Aviation Safety Authority (CASA)</b>	
<b>Issue</b>	<b>Response</b>
CASA has reviewed the Aviation Impact Statement (Version 1.1 of 5 May 2022 by AviPro) for Rooftop Landing Site at the Shoalhaven Hospital Redevelopment Project. CASA has no issues with the Aviation Impact Assessment and no objections to the Shoalhaven Hospital Redevelopment including the Rooftop Helicopter Landing Site	Noted.
Sundry Comment for Information: CASA does not regulate Helicopter Landing Sites. It is expected that the primary sources of advice regarding HLS, cranes etc would be NSW Health Infrastructure (or its aviation advisor) / Air Ambulance / Helicopter Emergency Service / helicopter operators. And, as the Aviation Impact Assessment indicates, the primary sources of advice regarding HMAS Albatross airspace would be Defence and Airservices.	Noted.
<b>Department of Environment and Planning (Water)</b>	
<b>Issue</b>	<b>Response</b>
DPE Water has reviewed the Environmental Impact Statement and provides the following recommendations. The proponent should:	See below.
Provide estimates of groundwater take during construction and operation of the proposed development.  <u>As per Attachment A:</u> The proponent should provide estimates of groundwater inflows/take during construction and operation of the proposed development, and demonstrate sufficient entitlements can be obtained unless an exemption applies.  <u>Explanation</u> Insufficient information has been provided to confirm the potential for groundwater take due to aquifer interference associated with construction and operation. Estimated volumes and the ability to account for this water take needs to be clearly understood.	In its Geotechnical reporting for this DA, Cardno advised as follows:  <i>Groundwater was not encountered during investigation. It should be noted that groundwater levels are likely to fluctuate with variations in climatic and site conditions. Seepage may also occur along the soil / rock interface during and after periods of wet weather.</i>  <i>Groundwater inflow was not encountered at the time of investigation. As seepage or inflow may be encountered during construction, an allowance should be made for control such water utilising a sump and pump.</i>  Cardno notes that its investigations, and the lack of groundwater, is consistent with geotechnical investigations reported at the site in 2012. No

	<p>ground water was encountered including in a 4m-deep well installed in one borehole.</p> <p>It is not believed that aquifer interference would result from the proposed works.</p>
<p>Ensure sufficient water entitlement is held in a Water Access Licence/s to account for the maximum predicted take for each water source before any take commences (unless an exemption applies).</p> <p><u>As per Attachment A:</u> The proponent must ensure sufficient water entitlement is held in a Water Access Licence/s (WAL) to account for the maximum predicted take before any take commences (unless an exemption applies).</p> <p><u>Explanation</u> An exemption from requiring a WAL may apply, and is dependent on the volumes specified in Schedule 4 Clause 7 of the <i>Water Management (General) Regulation 2018</i>. This is for the take of less than or equal to 3ML/year for aquifer interference activities such as dewatering. More information can be found at <a href="https://water.dpie.nsw.gov.au/licensing-and-trade/licensing/groundwater-wal-exemptions">https://water.dpie.nsw.gov.au/licensing-and-trade/licensing/groundwater-wal-exemptions</a> The proponent must ensure the relevant WAL(s) are held to account for the maximum predicted take for each water source, prior to take occurring.</p>	<p>As above, if groundwater is considered likely to be encountered, then the likely take of groundwater will be evaluated. The groundwater take would be based on the anticipated depth of groundwater and the elevation of the excavation.</p> <p>Groundwater take due to construction dewatering would be based on the anticipated drawdown of groundwater required to provide safe and dry conditions in the excavations.</p> <p>Based on the aforementioned information, it appears the likely take of groundwater would be minimal and would likely qualify for an exemption from a WAL. HI would support inclusion of a suitably worded condition.</p>
<p>Develop and implement a Construction Soil and Water Management Plan for the project prior to commencement of development activities, which includes management measures to measure, record and report any groundwater inflow volumes to the construction site (should this exceed 3 ML/yr) as part of the groundwater monitoring programme.</p> <p><u>As per Attachment A</u> The proponent should develop and implement a Construction Soil and Water Management Plan for the project prior to commencement of development activities.</p> <p><u>Explanation</u> DPE Water supports the proponent's stated intent in the EIS to develop and implement a Construction Soil and Water Management Plan for the project.</p> <p><u>As per Attachment A:</u> The Water Management Plan (WMP) should include management measures to measure, record and report any groundwater inflow volumes to the construction site (should this exceed 3 ML/yr) as part of the groundwater monitoring programme.</p> <p><u>Explanation</u> Consistent with Water Management Act (2002) and the AIP (2012), the WMP must include a groundwater monitoring programme which includes description of activities to measure, record and report (should inflow volume exceed 3ML/yr) any groundwater inflow volumes to the construction site.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>



Transport for NSW	
Issue	Response
TfNSW has reviewed the information provided and has no objections to the submitted SSD application in terms of the impacts it will have on the state classified road network. TfNSW has provided some additional comments to assist the Department of Planning and Environment (DP&E) with their assessment	Noted.
<b>Parking</b>	
While TfNSW notes that the issue of parking to service the new component of the development that the current SSD application is seeking approval for is an issue for Council to provide comments on as the impact will be on the adjacent local road network, it acknowledges the concerns that have been raised by Council about the lack of free on-site car parking to service the existing Shoalhaven Hospital development/precinct.	Noted – see further discussion below in response to this matter and in relation to Council's submission.
<p>TfNSW understands that the existing multi-story car park, which has been constructed in the Shoalhaven Hospital precinct in awareness of the current SSD proposal now being considered, is underutilised. While the proposed development will provide an important expansion of health facilities within the Shoalhaven Local Government Area the current proposal should ensure it provides:</p> <p>a) sufficient free or subsidised parking onsite at Shoalhaven Hospital (not on street); for staff and patients; and/or</p> <p>b) other measures in the surrounding precinct to better influence car parking on site for staff, patients, and visitors that are generated by the upgrade.</p>	<p>The multi-deck car park accommodates 230 cars and was opened in 2020. It has been subject to free parking or concessional parking rates since its opening (as well as other parking at the campus). This is a significant enticement to its use.</p> <p>The schedule of fees for free / concession parking within the hospital is as follows:</p> <p>For visitors to the hospital tickets are single visit, valid for one entry and one exit only:</p> <ul style="list-style-type: none"> <li>• 0 to 3 hours - Free</li> <li>• More than 3 hours - \$5.60</li> <li>• 3-day ticket - \$11.30</li> <li>• 7- day ticket - \$22.60</li> </ul> <p>3-day and 7-day tickets are issued as frequent use tickets and allow for multiple entries and exits to a hospital car park.</p> <p>To be eligible for concession parking, a visitor to the hospital is either a patient or carer who holds:</p> <ul style="list-style-type: none"> <li>• RMS issued Mobility Parking Scheme permit</li> <li>• Pensioner Concession Card</li> <li>• Gold Veterans Affairs Card</li> <li>• Health Care Card</li> <li>• Receiving Centrelink payments</li> </ul> <p>Or is attending hospital for:</p> <ul style="list-style-type: none"> <li>• ongoing cancer treatment</li> <li>• treatment more than twice weekly</li> <li>• daily dressing changes</li> <li>• cardiac rehabilitation or health promotion classes</li> </ul> <p>In terms of staff concession rates, staff parking is made available for \$15/week. During COVID alternative concessions (namely free parking) were applied.</p> <p>Parking was made free to HealthCare workers in the first wave of COVID from 10 April 2020, it ceased on 4 April 2021. Free parking came back in</p>

	<p>for second time from 23 July 2021 and is still in place. We have not been advised when this will cease, but expect about 4 weeks' notice prior to changes to the current arrangements.</p> <p>In the absence of the use of free or concession parking, the full schedule of fees is:</p> <ul style="list-style-type: none"> <li>• First 15 minutes Free</li> <li>• &lt; ¼ hr – 1 hr \$3.00</li> <li>• 1 hr – 2 hrs \$5.00</li> <li>• 2 hrs – 3 hrs \$6.00</li> <li>• 3 hrs – 4 hrs \$7.00</li> <li>• 4 hrs – 5 hrs \$8.00</li> <li>• &gt; 5hrs + \$10.00</li> <li>• Maximum daily fee \$10.00</li> </ul> <p>Despite the above, the take-up of free and concession parking for staff and visitors has resulted in a daily average capacity / vacancy within the multi-deck car park of the following over the last three months:</p> <ul style="list-style-type: none"> <li>• August = 67 with max daily of 115</li> <li>• September = 74 with max daily of 167</li> <li>• October = 66 with max daily of 184</li> </ul> <p>As is evident from these numbers, free or concession parking exists but is not fully utilised, despite the general enticement provided by free or reduced parking rates.</p> <p>Once the Acute Services Building the subject of this DA is completed and operational, HI is willing to monitor the level of on-site parking and reassess the circumstances within 18 months.</p> <p>See further discussion below on the same, or similar, matters as raised by Council in its submission.</p>
<p>The above to be undertaken while maintaining a focus on minimising the amount of private vehicle traffic generated by the proposal through delivering active and public transport supporting infrastructure as part of the upgrade. Further comments on Active Transport, Public Transport the Green Travel Plan (GTP) are provided below.</p>	<p>As set out below.</p>
<p><b>Active Transport</b></p>	
<p>The provision of cycling infrastructure, bike parking spaces, and end-of-trip facilities is supported by TfNSW. DP&amp;E should ensure sufficient infrastructure will be provided and is in place at the opening of the new facility.</p> <p>TfNSW notes that the new pedestrian footpaths are being provided on North Street and Shoalhaven Street as part of the proposal. TfNSW encourages further discussions to be had with Council before the SSD applications determination to ensure all required connectivity to/from the hospital to the Shoalhaven Riverfront Precinct, Nowra CBD, and Bomaderry Station</p>	<p>Noted.</p> <p>Appropriate active transport measures are proposed to be in place relative to the context and circumstances.</p> <p>As per the EIS, the tangible benefits for cycling are likely to be realised through the provision of 90 bicycle storage spaces located in the undercroft parking area of Block B of the hospital collocated with existing adjacent end of trip facilities for showering and changing.</p>

<p>is being provided as part of the development and are in place on opening of the new facility.</p>	<p>Connectivity into the hospital from its perimeter and surrounding areas is to be enhanced with legible accessways, whether along Scenic Drive, North Street and into the hospital via the new access road, and/or through the former Nowra Park or footpaths along North Street and Shoalhaven Street.</p>
<p><b>Public Transport</b></p>	
<p>TfNSW is supportive of working with NSW Health Infrastructure to ensure improved public transport is provided to and from the Shoalhaven Hospital Precinct to the Nowra Riverfront Precinct (the Riverfront Precinct), Nowra CBD, and Bomaderry Station. The submitted documentation provides limited details on how the above will be achieved apart from referencing the TfNSW 16 Regional Cities Services Improvement Program.</p> <p>TfNSW encourages further discussions with the TfNSW Bus Planning Team (Dane Graham, Senior Manager Transport Planning – 0432 768 119) before the determination of the application to discuss how existing levels of public transport use can be enhanced for both staff and visitors.</p>	<p>HI is also supportive of public transport enhancements and improvements to and around the hospital and in relation to the Riverfront Precinct. HI would support engagement as part of the decision-making processes of TfNSW.</p> <p>It is HI's view that this matter need not be resolved ahead of determination of this DA but could form part of ongoing liaison over time up to the operation of the Acute Services Building.</p>
<p><b>Green Travel Plan</b></p>	
<p>TfNSW notes the Transport and Accessibility Impact Assessment (TAIA) prepared by Taylor Thomson Whitting Pty Ltd (dated 21 September 2022) contains details on a GTP, however, no GTP has been provided at this time. TfNSW would ask that a separate/final GTP that is ready to implement be prepared and submitted to TfNSW for review before the occupation of the building, rather than the preliminary steps as has currently been provided in the TAIA to create the GTP. Some comments to assist in the preparation of the GTP are provided below:</p>	<p>Noted. HI would support inclusion of a suitably worded condition related to matters (a) to (j) below.</p> <p>Notwithstanding, please find attached at <b>Appendix D</b> a Preliminary Green Travel Plan addressing relevant matters as set out in (a) – (j), with all aspects to be further refined prior to occupation of the development, as is common and the most appropriate time to finalise such a plan.</p> <p>In this Preliminary Green Travel Plan TTW has, at a high level, investigated further initiatives and specific strategies to achieve proposed mode share targets.</p> <p>It has further reviewed the structure of the plan in accordance with the TfNSW Travel Plan Toolkit for Hospital Precincts. This work has involved communication with HI and the ISLHD about specific strategies to be explored and implemented.</p> <p>The draft Green Travel has addressed (a) items (iii), (iv) and (ix) as set out below.</p>
<p><b>a) GTP Content:</b> A GTP should:</p>	
<p>i) Identify and determine a course for the delivery of mode share targets and strategies that encourage the use of sustainable transport options that reduce the dependence on and proportion of single occupant car journeys to the site, based on credible data.</p> <p>ii) Be prepared by a suitably qualified transport or traffic consultant.</p> <p>iii) Include specific tools and actions to help achieve the objectives and mode share targets.</p>	<p>As above.</p> <p>TTW has included Travel Mode Targets as well as Travel Plan Outputs in its Preliminary Green Travel Plan. These broadly include:</p> <ul style="list-style-type: none"> <li>• Encouraging Active Transport</li> <li>• Encouraging Public Transport</li> <li>• Encouraging carpooling</li> <li>• Ongoing Management</li> </ul>

iv) Include measures to promote and support the implementation of the plan.	<p>The Preliminary Green Travel Plan also at this stage sets out Monitoring and Reporting, Communications Planning, and Travel Access Guide information on ways the promote and support the implementation of the plan.</p> <p>These will be refined and the Green Travel Plan develops and matures.</p> <p>Proposed end of trip facilities are included in the plan along with access and use of these facilities.</p> <p>A draft TAG is included.</p> <p>See <b>Appendix D</b>.</p>	
v) Identification of a responsible party (or Committee) for the ongoing implementation of the GTP.		
vi) Confirmation of the extent and nature of the end-of-trip facilities and bicycle parking and how they will be promoted to staff, users of the new facility, and visitors.		
vii) Consideration of car parking management strategies that may be required to encourage sustainable transport use/mode share targets.		
viii) Include a draft Transport Access Guide (TAG) to provide information to staff, students, and visitors about the range of travel modes, access arrangements, and supporting facilities that service the site.		
ix) Identification of a communications strategy for conveying GTP information to staff, students, and visitors, including for the TAG.		
b) <b>Mode Share:</b> TfNSW appreciates the work undertaken on the preliminary mode share targets and recommends that sufficient measures are detailed to continue to reduce the proportion of single-occupant car travel by employees to and from the site and increase the mode share of public transport and active transport for the life of the development		
As the site lacks public and active transport networks, these mode shares should be done on both a short and long term basis. Short term mode shares could be shuttle buses carrying staff to and from the nearby train station or car-pooling as some examples. These objectives need to be met within your Implementation Plan discussed below. The target mode shares should include car-pooling, carsharing and shuttle buses. Longer term goals should include increased mode shares once any future transport upgrades and safer cycling and walking connections have been created.	<p>As above, TTW has, at a high level, investigated further initiatives and specific strategies to achieve proposed mode share targets. This is captured in the current Preliminary Green Travel Plan provided with this RtS at <b>Appendix D</b>. This will be further refined with an revised Green Travel as required through standard conditions of consent.</p>	
c) <b>Parking Management Strategy:</b> TfNSW asks that a parking management strategy be implemented for both the short and long term. TfNSW also asks that the GTP implements a car parking management strategy that prioritises use by staff and visitors on a needs basis, and actively encourages staff and visitors to use sustainable transport options that are available to and from the site. This will include consideration of strategies on how car parking onsite will be managed as detailed in Point 1 above.		
d) <b>Shuttle Buses:</b> NSW Health Infrastructure should consider the provision of an on-demand/shuttle bus service to and from the site (i.e. to the Nowra CBD and Bomaderry Train Station) for staff and users of the development. This is particularly important if staff shift times are unable to align with that of available public transport.		
e) <b>Travel Access Guide (TAG):</b> TfNSW asks that a Travel Access Guide (TAG) be prepared as part of the GTP and included as an Appendix in the GTP. The TAG should include the following:		
i) Provide information about cycling, walking, and public transport initiatives to encourage the use of sustainable transport journeys by staff and students.		
ii) Provide promotion of end-of-trip (EoT) facilities, including any new cycling infrastructure available, and update the number and location of bicycle parking and EoT facilities.	<p>As above. A TAG will be developed as part of the refined Green Travel Plan. HI is willing to accept a suitably worded standard condition.</p>	

iii) Provide information on car share, car-pooling, and priority parking for people that car pool or car-share.	
iv) For further helpful information – please check this link <a href="#">How to Create a Travel Access Guide doc here.</a>	
f) <b>Bicycle Parking and End of Trip (EoT):</b> TfNSW notes that there will be 90 bike storage spaces on site, however, it is unclear where these facilities are located within the existing hospital precinct, how many showers and lockers are proposed and where any facilities for members of the public (i.e. secure bike parking) will be provided. A good supply of quality EoT and bicycle parking is considered necessary to further encourage walking and cycling mode shares for both staff and visitors.	
In addition to the above, TfNSW recommends that this bicycle parking and any EoT facilities should be monitored over time to ensure sufficient supply and to encourage active transport both to/from the site for employees, students, patients, and visitors. The bicycle parking should be located at the site at convenient locations, and be safe, secured, and under cover. Some further guidance on bicycle parking and EoT facilities can be found in the <a href="#">cycleway design toolkit</a> .	
g) <b>Surveys:</b> TfNSW notes that the GTP will include a travel mode survey. It is however requested that the proposed travel survey (including questions) to be distributed 3 months post -occupancy be included as a separate appendix in the GTP. An example of a travel survey questionnaire is included here. The survey should include questions to: i) obtain employee, patient, visitor, and student residential postcodes to identify the actual travel origin and destination patterns; and ii) inform strategies that help to encourage walking, cycling, and public transport use to and from the site	
h) <b>Staggering shift times:</b> TfNSW recommends that staff shift times are altered so they match up with train and bus times so that staff can get to and from work safely with access to active and public transport connections. TfNSW recommends the applicant uses flexible work policies and working from home policies as detailed in the Transport and Accessibility Impact Assessment. These policies can be put into proactive action tasks that will become part of your initiatives in your Implementation Plan (listed below).	
i) <b>Initiatives:</b> TfNSW appreciates the initiatives for staff, patients, and visitors to use sustainable travel that have been suggested by you. To further encourage more staff, patients, and visitors to participate in sustainable transport options (both long and short term) we would also encourage you to consider the following initiatives (these can be included as proactive actions in your Implementation Plan):	As above. TTW's work on this current Preliminary Green Travel Plan has involved communication with HI and the ISLHD about specific strategies to be explored and implemented. This will be further developed in a final Green Travel Plan, subject to standard conditions of consent.
i) Pre-loaded opal cards for new staff;	
ii) Salary sacrifice options for bicycle purchases;	
iii) Subsidised panniers or backpacks for staff who commit to active travel;	
iv) Incentives for participation in National Ride2 Work Day and Walk to Work Day;	
v) Designated priority car share spaces on site with monitored compliance (i.e. for GoGet cars or people who carpool);	
vi) Funded Guaranteed Ride Home service for those choosing to car share for their commute;	

vii) Provision of real-time information screens onsite;	
viii) Review of wayfinding and signage Nowra CBD and Bomaderry Station and the hospital and liaise with authorities for improvements where required;	
ix) Information about the benefits (including health and financial) of active travel.	
j) <b>Governance of Green Travel Plan:</b> TfNSW recommends that NSW Health Infrastructure appoint a Travel Plan Coordinator for the life of the development, who will manage the GTP. More information can be found in the Hospital Toolkit link. Senior management support, and a good decision making/governance framework are critical for a successful GTP. Establishing good governance is especially important in a precinct where the approval processes of multiple organisations must be considered. The GTP will need to have a steering group or committee created with relevant internal and external stakeholders to inform future targets and the ongoing monitoring and revision of the GTP for five years post-occupancy.	
<b>Adjoining Precincts</b>	
TfNSW is working closely with Shoalhaven City Council and several other key stakeholders including NSW Health on the development of the Riverfront Precinct, specifically to assist with integrated transport planning activities to assist Council to deliver its vision for the Riverfront Precinct.	Noted.
In August 2022 representatives from Transport for NSW, Shoalhaven City Council, and NSW Health took part in a Visioning workshop. Other participants included the Aboriginal Land Council, the Department of Regional NSW, and the DP&E. While the footprint of the Hospital does not sit within the study area for the Riverfront Precinct, it is adjacent and access to and from the hospital is via the riverfront precinct transport network.	
The findings of the workshop engagement activities are reflected in the Place Vision document prepared for Council. Council will be able to offer further comment on the alignment of this proposal with the document however it is important to note that a key outcome of the workshop reflected in the Draft document, is that "the Riverfront should focus on sustainable activation, that is, the users who will make the Riverfront part of their everyday lives, and preference active transport over the need for car parking and high maintenance costs."	It is our view that the design makes the best and balanced use of this area to serve as a hospital and health precinct whilst providing for new and redesigned open space, including the retention of the significant Blackbutt tree (Tree No.50 under this EIS). The proposal, in its context, is not contrary to the vision of "the Riverfront should focus on sustainable activation, that is, the users who will make the Riverfront part of their everyday lives, and preference active transport over the need for car parking and high maintenance costs."
	The establishment and operation of the Green Travel Plan will further enhance the achievement of this Vision and ensure that contextually the hospital can fit within the broader aims of sustainable activation of the Riverfront.
The proposal to expand the hospital has the potential to negatively impact the operation of the transport network that will service the adjacent Riverfront Precinct. Consideration of the Council's intention to develop an integrated transport plan for the Riverfront Precinct and the focus on reducing car dependency and appropriate car parking capacity to deliver the vision for	It is our view that the redevelopment is suitably able to embody this vision of "safe, social, healthy & green".
	The successful implementation of public and active transport by relevant authorities, including improved and enhanced services by TfNSW and the



the precinct is encouraged (i.e. noting that the precinct will look "safe, social, healthy & green" not "hard, grey & formal" as described in the Draft Nowra Riverfront Place Vision report).	operation of the proposed Green Travel Plan will help meet this objective.
<b>Shoalhaven City Council</b>	
<b>Issue</b>	<b>Response</b>
Council strongly supports the proposed expansion of the Shoalhaven District Memorial Hospital which will create a state-of-the-art health facility, helping to ensure that our communities have access to a range of health services needed now and into the future.	Noted.
<b>Strategic Planning Comments/Requirements</b>	
<b>Parking</b>	
<p>This has been a key ongoing issue of concern to Council in regard to the hospital as it has continued to evolve in its current location. Council has consistently requested the provision of 'free' parking associated with the hospital and in this regard most recently resolved to request the NSW Government to at least remove all impediments to the provision of "no-charge parking" for nurses in particular, and other hospital employees in general, as a matter of urgency. As such in this context, this proposal/application needs to consider and provide appropriate free parking for employees and visitors alike. This is critical for the functioning of the new hospital and to ensure that it does not have a further negative impact on the amenity of the adjoining precincts. This is perhaps one of the key issues that the application needs to address and be clear on.</p>	<p>As set out above in the corresponding response to TfNSW's submission, the multi-deck car park accommodates 230 cars and was opened in 2020. It has been subject to free parking or concession parking rates since its opening (as well as other parking at the campus). This is a significant enticement to the use of this car park.</p> <p>The schedule of fees for free / concession parking within the hospital is as follows:</p> <p>For visitors to the hospital tickets are single visit, valid for one entry and one exit only:</p> <ul style="list-style-type: none"> <li>• 0 to 3 hours - Free</li> <li>• More than 3 hours - \$5.60</li> <li>• 3-day ticket - \$11.30</li> <li>• 7- day ticket - \$22.60</li> </ul> <p>3-day and 7-day tickets are issued as frequent use tickets and allow for multiple entries and exits to a hospital car park.</p> <p>To be eligible for concession parking, a visitor to the hospital is either a patient or carer who holds:</p> <ul style="list-style-type: none"> <li>• RMS issued Mobility Parking Scheme permit</li> <li>• Pensioner Concession Card</li> <li>• Gold Veterans Affairs Card</li> <li>• Health Care Card</li> <li>• Receiving Centrelink payments</li> </ul> <p>Or is attending hospital for:</p> <ul style="list-style-type: none"> <li>• ongoing cancer treatment</li> <li>• treatment more than twice weekly</li> <li>• daily dressing changes</li> <li>• cardiac rehabilitation or health promotion classes</li> </ul> <p>In terms of staff concession rates, staff parking is made available for \$15/week. During COVID alternative concessions (namely free parking) were applied.</p> <p>Parking was made free to HealthCare workers in the first wave of COVID from 10 April 2020, it ceased on 4 April 2021. Free parking came back in for second time from 23 July 2021 and is still in place. We have not been advised when this will</p>

	<p>cease, but expect about 4 weeks' notice prior to changes to the current arrangements.</p> <p>In the absence of the use of free or concession parking, the full schedule of fees is:</p> <ul style="list-style-type: none"> <li>• First 15 minutes Free</li> <li>• &lt; ¼ hr – 1 hr \$3.00</li> <li>• 1 hr – 2 hrs \$5.00</li> <li>• 2 hrs – 3 hrs \$6.00</li> <li>• 3 hrs – 4 hrs \$7.00</li> <li>• 4 hrs – 5 hrs \$8.00</li> <li>• &gt; 5hrs + \$10.00</li> <li>• Maximum daily fee \$10.00</li> </ul> <p>Despite the above, the take-up of free and concession parking for staff and visitors has resulted in a daily average capacity / vacancy within the multi-deck car park of the following over the last three months:</p> <ul style="list-style-type: none"> <li>• August = 67 with max daily of 115</li> <li>• September = 74 with max daily of 167</li> <li>• October = 66 with max daily of 184</li> </ul> <p>As is evident from these numbers, free or concession parking exists but is not fully utilised, despite the enticements.</p> <p>Once the Acute Services Building the subject of this DA is completed and operational, HI is willing to monitor the level of on-site parking and reassess the circumstances within 18 months.</p>
<p><b>Clinical Services</b></p> <p>Council considers it essential that an appropriate range of clinical services is provided through the hospital redevelopment to cater for the current and future populations of Shoalhaven. Some of the key clinical service considerations are touched on in the Council resolution of 25 May 2021.</p>	<p>Council's resolution of 25<sup>th</sup> May 2021 is as follows:</p> <p><i>Council staff write to the Illawarra-Shoalhaven Area Health Service and the following list of prominent state parliamentarians, to urgently draw their attention to major inadequacies existing at Shoalhaven Hospital. The list is by no means exhaustive but has been compiled by very concerned members of our community with possible solutions indicated:</i></p> <ol style="list-style-type: none"> <li>1. MRI machine on-site and available for use 7 days a week.</li> <li>2. Establishment of a well-resourced Fracture Clinic so that local patients can be treated locally.</li> <li>3. Major upgrade of the Computer - Administration system so that all areas within the hospital precinct, (including the Cancer Care facility), can effectively "talk to each other".</li> <li>4. Create a well-resourced Oncology section in the general hospital to provide greater care for cancer sufferers who are experiencing extreme difficulties.</li> <li>5. Provide a greater resource level at the Cancer Care Centre such that two Oncology Registrars are on duty each day, thus giving a raised level of support to both patients and nurses.</li> </ol>

	<p>6. <i>Ensure that the meeting of "benchmarks", (as efficient as they may appear), does not cut across the provision of both compassionate and quality health care. An example may be the apparent desire to accept gravely-ill nursing home patients through the Emergency Department, provide some form of treatment and care, and then sending the frail patient back to the same nursing home to perhaps die, rather than take up valuable bed space in a general ward.</i></p> <p>7. <i>Prepare for the impacts of planned phasing out of the palliative care from David Berry Hospital</i></p> <p>8. <i>Remove all impediments to the provision of "no-charge parking" for nurses in particular, and other hospital employees in general, as a matter of urgency.</i></p> <p>9. <i>The list of State Parliamentarians to include:</i></p> <ol style="list-style-type: none"><li><i>The Hon Gladys Berejiklian, MP, Premier of NSW.</i></li><li><i>The Hon Brad Hazzard, MP, Minister for Health and Medical Research.</i></li><li><i>The Hon Shelley Hancock, MP, Minister for Local Government.</i></li><li><i>The Hon Gareth Ward, MP, Member for Kiama.</i></li><li><i>Ms Jodi McKay, MP, Leader of the Opposition.</i></li><li><i>Mr Ryan Park, MP, Shadow Minister for Health.</i></li><li><i>Ms Kate Washington, MP, Shadow Minister for Rural Health</i></li></ol> <p>10. <i>Council request Illawarra Shoalhaven Local Health District to provide a copy of the Clinical Services Plan for the proposed upgrade of Shoalhaven District Memorial Hospital, and that once received the Clinical Services Plan be made available to the community via the Council website.</i></p> <p>As noted in the EIS, the development is in direct response to the Clinical Services Plan (CSP) for the provision of health services at the hospital. The CSP November 2020 as prepared by the Illawarra Shoalhaven Local Health District (ISLHD) identified that redevelopment was necessary to grow and adjust services to meet changing health needs within the region. The redevelopment is required to continue to provide first-class health services within the ISLHD, cater for population growth and changed demographic circumstances, and expand and diversify clinical functions within the hospital.</p> <p>Consistent with the CSP, the overall Vision for the redevelopment project is for:</p> <ul style="list-style-type: none"><li>• The redeveloped Shoalhaven Hospital to be the health hub for the region, providing for the majority of emergency, critical care, acute, subacute and non-admitted services locally, and reducing the need to</li></ul>
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	<p>transfer patients to Wollongong and Sydney.</p> <ul style="list-style-type: none"> <li>• The redeveloped Shoalhaven Hospital to operate at a greater complexity level and be able to serve the majority of the region's health needs locally.</li> <li>• Shoalhaven Hospital to continue to be linked with Wollongong and the new Shellharbour Hospital as part of a District-wide network.</li> <li>• Fewer people to need to be transferred to Wollongong Hospital or to Sydney for services such as cardiology, neurology/stroke and complex surgeries.</li> </ul> <p>The overall Project Objectives are to:</p> <ul style="list-style-type: none"> <li>• Provide the infrastructure to meet the growing health care needs of the population in the Shoalhaven LGA and surrounds.</li> <li>• Provide equitable access to services for the residents of the Shoalhaven LGA and surrounds by increasing the self-sufficiency of the hospital.</li> <li>• Support contemporary models of care, in particular, non-admitted and day only episodes of care and virtual modalities.</li> <li>• Provide maximum possible digital hospital scope to enable ISLHD to capitalise on current and future opportunities.</li> <li>• Improve efficiency to staff and patient flows by providing a zonal approach to clinical services with improved functional adjacencies.</li> <li>• Design and build a facility that maximises ongoing resource efficiency and enables ISLHD to reduce its carbon footprint.</li> <li>• Provide culturally-appropriate facilities to meet the needs of the First Nations people.</li> </ul>
<b>Traffic Management</b>	
<p>Given the location of the existing hospital and the proposed redevelopment of the area generally, it is critical that traffic impact and management/mitigation are appropriately considered so as not to unduly impact on adjoining precincts and recognising relevant other land uses (e.g. schools). The traffic management considerations associated with the hospital also need to consider integration with other significant projects in the broader surrounding area, including specifically the Nowra Riverfront Precinct, which is another State Significant Precinct recognised in the Regional Plan. In this regard it is critical that there are a range of transport options to access the redeveloped hospital that also focus on active and public transport so as to limit where possible excessive car use/access – the provision of regular upfront bus services that link the hospital and adjoining key precincts (Riverfront Precinct) to the Nowra CBD, Bomaderry Railway Station and the broader Shoalhaven is considered essential.</p>	<p>The proposal includes various design elements to support public and active transport to the site. This includes:</p> <ul style="list-style-type: none"> <li>• New footpaths along the Shoalhaven Street and North Street site frontages. Pedestrian access is then further promoted to within and through various locations of the site.</li> <li>• Provision of 90 bicycle spaces.</li> <li>• Spatial allowance for buses to access the main entry for potential future bus routes to site.</li> </ul> <p>As outlined further below, consultation was undertaken with TfNSW regarding future public transport planning. Following this consultation, the proposal included spatial allowances for buses to access the main entry for potential future bus services to the site.</p>

This is something that the NSW Government need to commit to and work on with Council and others.	
<b>Retention of vegetation and management of remnant park</b>	
It is important that the existing remnant vegetation that is located within the area at the southern end of the subject site that is shown in the Zonal Master Plan is retained in the long term and also reinforced in an appropriate manner. This includes the significant blackbutt tree that is located in this area. The proposed design needs to take advantage of this retained space integrate the open space and hospital.	The development proposes this and is reflected as such in a range of reports and drawings, not the least the landscape and architectural drawings and statements, arboricultural assessment, and the EIS.
Some early discussions were held with Council regarding the future management of the retained park area. Further clarification and discussions are required in this regard as the project advances. It is also important that existing street trees along Shoalhaven Street are retained and replaced/augmented where needed.	<p>The future management of the remaining area of park will be by the ISLHD, consistent with other hospitals with areas of open space within their boundaries.</p> <p>Street trees have been retained as far as is practicable in balancing the principles of tree retention with providing active transport access, as well as new access into the hospital. Trees retained will be protected during works. HI's tree replacement policy is enforced and applied in relation to this development. As noted in the EIS, with some 26 removed trees (many being exotic species) and 65 replacement native canopy trees, this is a replacement ratio of 2.5:1. The native species removed will be replaced with the same or similar species, as well as with further locally endemic species to improve the biodiversity outcomes at the redeveloped campus.</p>
<b>Design and neighbourhood amenity</b>	
Given the prominent location of this site it is important that the development is designed and built to a high standard that also considers (and mitigates where possible) its potential impact on the amenity of the adjoining residential neighbourhoods. This includes height, bulk, scale, façade design etc.	This has been addressed in and by the EIS and the various supporting documents, including the Architectural Design Statement (which includes the outcomes of the State Design Review process).
<b>Other impacts</b>	
In early discussions with Health Infrastructure, it was flagged that there are existing water mains and other infrastructure that may be impacted by the redevelopment works. As such it is important that Council's Shoalhaven Water is fully engaged, as well as Council's City Services if it is proposed (for example) to relocate existing infrastructure into the Shoalhaven Street road reserve.	<p>This has been the case. As noted in the Engagement section of the EIS and in the Jacobs reporting on hydraulic services consultation ahead of the DA's lodgement.</p> <p>See also the Shoalhaven Water comments below which do not suggest inadequate consultation given the provision of a range draft conditions of consent for use by DPE.</p>
<b>Future zoning</b>	
This is now being separately handled by NSW Department of Planning and Environment via a proposed amendment to Shoalhaven Local Environmental Plan 2014.	Noted.
It is noted that Council has been provided with the opportunity to comment on the Explanation of Intended Effects (EIE) for the proposed State Environmental Planning Policy (SEPP – Shoalhaven Hospital).	Noted.
Council has provided a separate submission on the EIE for the proposed SEPP.	Noted. In that submission <i>Council strongly supports the proposed expansion of the Shoalhaven District Memorial Hospital which will create a state-of-the-art health facility, helping to ensure that our</i>

	<p><i>communities have access to a range of health services needed now and into the future.</i></p> <p><i>Further, Council supports the proposed SEPP Shoalhaven Hospital, as outlined in the EIE, which will help recognise and facilitate the proposed future expansion of the Shoalhaven District Memorial Hospital and relocation of the Shoalhaven Community Preschool.</i></p>
<b>Development Engineer Comments/Requirements</b>	
<b>Bush Fire Protection</b>	
No specific access requirements. Evacuation is to be addressed in a future Bush Fire Evacuation Report.	<p>Refer to Eco Logical's Bushfire Protection Assessment where this has been flagged. This is to be prepared as noted.</p> <p>Noted. HI would support inclusion of a suitably worded condition.</p>
The Bushfire Protection Assessment Report by Eco Logical Australia Pty Ltd proposes the Asset Protection Zones (APZs) required to the north and west of the existing and proposed hospital development. The applicant should ensure that these APZs are not located within the hazard side of the road reserve. Any APZ should commence from the kerb on the outer side of the road.	<p>Eco Logical has advised that the assessment included the managed portion of Scenic Drive in the APZ which includes the road carriageway and the concrete footpath on the opposite side of Scenic Drive (where that exists) as that will be managed in perpetuity. None of the vegetated portion of the Scenic Drive road reserve has been included in the APZ.</p> <p>Even if none of Scenic Drive has been included in the APZ, the required 47m APZ would still fit quite comfortably within the existing managed grounds of the hospital.</p>
<b>Earthworks</b>	
The concept bulk earthworks plans show a cut volume of 17,734m <sup>3</sup> and fill volume of 3,403m <sup>3</sup> . This results in a significant excess of 14,331m <sup>3</sup> , which is not seen as a design that responds to the natural landform and topography.	<p>Conrad Gargett has considered this comment and advised that the design concept was to minimise the bulk of the new acute services building on the site so that visual impact from the adjacent parkland was minimised.</p> <p>The cut volume is predominately at level 0 to provide a larger footprint at the Shoalhaven Street level, hidden from the street. It enables the back of house activities that support the hospital to have direct access from Shoalhaven Street and minimise access roadworks.</p> <p>It also consolidates support activities close to the central lift core and reduces the volume of the building that is seen above the ground.</p> <p>The natural topography of the site is maintained as the building access points respond to existing contour lines. There is minimal cut and fill work within the building surrounds. Roadworks and landscaping generally following the natural ground lines.</p> <p>In addition Bonacci advises as follows with respect to the cut/fill balance.</p> <p>Connections needed to existing buildings and as such the level of the building for those floors was fixed. With a connection needed to Shoalhaven</p>

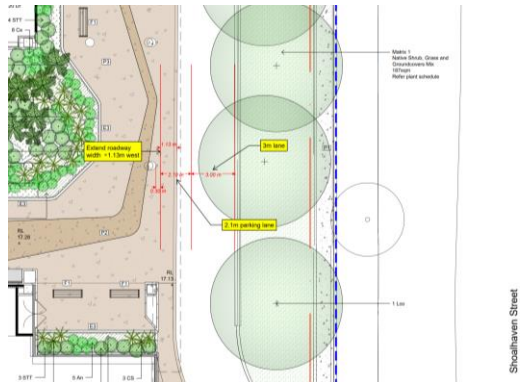



	Street, and required floor to floor heights for hospital, this set lower floor levels. The required clinical floor planning, and connection between upper and lower levels, also drove extent of footprint at lower level, which resulted in the cut/fill volume evolution. Slope across the site is in the order of 7m, which leads to the cut volumes.
Quite a lot of the cut proposed is within an existing rock layer which would require extensive mechanical means of removal such as rock breaking / hammering / sawing. This is likely to cause great impact on adjacent residents who would need to deal with the noise and vibration impacts associated with these works. Ideally, the amount of cut within rock should be minimised.	<p>Bonacci indicates the volume of rock excavation is approximately 2,000m<sup>3</sup>, so rock cut is not a large proportion of the overall cut.</p> <p>Also, as noted in the EIS a construction noise management plan will still need to be developed prior to construction commencing that includes:</p> <ul style="list-style-type: none"> <li>• Identification of sensitive receivers potentially impacted and nominates noise and vibration management objectives for each.</li> <li>• Identification of the proposed significant construction activities, plant and processes and times of site operation.</li> <li>• Predictions and assessments of noise and vibration impacts and recommended appropriate controls.</li> <li>• Nominated complaint handling procedures and responses, community liaison principles and site management practices to be adopted.</li> </ul>
Batters of 1(V):2(H) are proposed on the engineering plans. The steepness of these batters is typically not desirable as they can be prone to erosion and stability issues as well as being difficult to maintain. These batters should be mass planted, mulched and protected with a material such as geofabric.	Bonacci has advised that a permanent batter of 1 in 2 is to be appropriately stabilised if required, noting this is under the building so is not exposed so will not be planted.
Some of the above batters will also be within the rock layer which would likely result in a poor amenity outcome. The applicant should address how these areas will be embellished.	Site Image has advised that planting arrangements will incorporate rock as necessary using creepers and cascading plants to intermingle. Pockets are to be provided to allow for canopy tree planting. Exposure of rock will be celebrated as a key local element.
A batter close to vertical is proposed on Section 02. Further information cannot be found on this batter and how the land behind the batter will be adequately retained.	Bonacci advises that this is for the hospital building for Level 0 and Level 0 lower which are at different levels. Reference is made to the architectural drawings and sections. This is not a batter, rather it is where the building wall will be located (and as noted in the Geotechnical report). Near vertical batters will be possible for short periods to allow construction of this wall.
The OSD proposed directly adjacent to the road reserve on Shoalhaven Street may result in de-stabilisation of the road reserve.	Bonacci indicates shoring will be provided if required to the boundary.
<b>Stormwater</b>	
An on-site detention tank has been proposed as part of the works to ensure that post development peak flowrates are no worse than pre-development. However, the applicant has not modelled the required storm events as per Shoalhaven Development Control Plan 2014 (SDCP 2014). Given this is unlikely to increase the size of the tank, it is considered acceptable to condition this is checked as part of the detailed stormwater design.	Noted. HI would support inclusion of a suitably worded condition.

<p>The applicant proposes a dispersion trench within the south-east corner of the site to re-direct stormwater away from the site from the undeveloped land. Conditions will be imposed to ensure there is adequate infiltration on site for the design and otherwise will be required to be re-directed towards the existing or proposed stormwater infrastructure.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p>The existing stormwater pipe proposed to connect in with on Shoalhaven Street is only 450mm in diameter which indicates that the 600mm stormwater line from the site will put the line over capacity. Additionally, Council does not allow the connection of a larger pipe to a downstream smaller pipe due to blockage potential. Conditions will be applied for the applicant to undertake a capacity check and upsizing of downstream infrastructure.</p>	<p>Based on information Bonacci has, the downstream pipe at the street pit that is proposed to be connected to is 600mm in diameter. The pipe out from the hospital site is also 600mm in diameter resulting in a connection with equal diameter / parity.</p> <p>The OSD for the site limits peak flows to less than pre-developed flows, so connection should be adequate. Note that Bonacci could reduce the pipe connection to the street pit and still comply with requirement to limit post-development flows to pre-development (and this would also address the further points set out below in Council's submission).</p>
<p>The existing Council stormwater infrastructure within the south-east corner of the site within the easement is unaffected by the proposal.</p>	<p>Noted.</p>
<p><b>Traffic / Parking</b></p>	
<p>Please refer to Council's Principal Transport Engineer detailed comments later in this submission in response to the submitted Transport and Accessibility Impact Assessment.</p>	<p>Noted. As below.</p>
<p>It is important to note that the project control group which was created to assist with the preparation of this assessment report was not adequately consulted and were not given the opportunity to provide feedback in response to the findings outlined in the report. This is disappointing, given Council and Transport for NSW allocated a number of staffing resources towards this work in the hope of achieving some mutually agreeable outcomes.</p>	<p>HI does not feel this is an accurate representation of the level of engagement carried out between HI and its consultants with Council and TfNSW.</p> <p>As set out in both the EIS and the Traffic and Accessibility Impact Assessment (TIA), engagement was extensive. The Project Control Group referred to appears to be the Transport Working Group that was constituted by TTW on behalf of HI.</p> <p>Engagement also included direct liaison between TTW and Council and the sharing of modelling data.</p> <p>The TIA report was prepared alongside, and in response to, a thorough consultation process.</p> <p>The consultation process included:</p> <ul style="list-style-type: none"> <li>• Two Transport Working Group meetings on 18 May 2021 and a year later on 18 May 2022.</li> <li>• '16 Cities' future service planning meeting on 28 October 2021 with HI, TTW and TfNSW to discuss future public transport planning.</li> <li>• Email and phone call discussions with Shoalhaven Council's traffic and transport team</li> </ul>

	<p>Notwithstanding, the above, the regular monthly meetings between HI and Council would have addressed these same matters. In any case, the ongoing programme of consultation with Council allows for issues to continue to be discussed and potentially resolved.</p>
<p>Council has made several resolutions in relation to the parking and traffic impacts associated with the hospital. Concerns remain that the proposal will not provide adequate measures to address the reliance on on-street parking for staff, patients and visitors associated with the hospital and with the expansion is likely to increase this reliance. The multi-story carpark previously constructed is underutilised as it is a paid parking arrangement and therefore has done little to address the impacts on the surrounding local roads. Chapter G21, SDCP 2014 clearly requires a development to provide parking facilities on-site and not rely on on-street parking. This is at odds with the Transport and Accessibility Impact Assessment, which assumes that parking within the local streets is available for the use of the hospital. It is therefore Council's position that the majority of the parking required for the hospital should be provided onsite, be free (at least for staff) and where this cannot be met, provide measures within the local roads such as pedestrian lighting, footpaths, etc. to provide a safe and convenient path of travel for hospital staff and visitors.</p>	<p>Again, as set out above in the corresponding response to TfNSW's submission, the multi-deck car park accommodates 230 cars and was opened in 2020. It has been subject to free parking or concession parking rates since its opening (as well as other campus parking). This is a significant enticement to the use of this car park.</p> <p>The schedule of fees for free / concession parking within the hospital is as follows:</p> <p>For visitors to the hospital tickets are single visit, valid for one entry and one exit only:</p> <ul style="list-style-type: none"> <li>• 0 to 3 hours - Free</li> <li>• More than 3 hours - \$5.60</li> <li>• 3-day ticket - \$11.30</li> <li>• 7- day ticket - \$22.60</li> </ul> <p>3-day and 7-day tickets are issued as frequent use tickets and allow for multiple entries and exits to a hospital car park.</p> <p>To be eligible for concession parking, a visitor to the hospital is either a patient or carer who holds:</p> <ul style="list-style-type: none"> <li>• RMS issued Mobility Parking Scheme permit</li> <li>• Pensioner Concession Card</li> <li>• Gold Veterans Affairs Card</li> <li>• Health Care Card</li> <li>• Receiving Centrelink payments</li> </ul> <p>Or is attending hospital for:</p> <ul style="list-style-type: none"> <li>• ongoing cancer treatment</li> <li>• treatment more than twice weekly</li> <li>• daily dressing changes</li> <li>• cardiac rehabilitation or health promotion classes</li> </ul> <p>In terms of staff concession rates, staff parking is made available for \$15/week. During COVID alternative concessions (namely free parking) were applied.</p> <p>Parking was made free to HealthCare workers in the first wave of COVID from 10 April 2020, it ceased on 4 April 2021. Free parking came back in for second time from 23 July 2021 and is still in place. We have not been advised when this will cease, but expect about 4 weeks' notice prior to changes to the current arrangements.</p> <p>In the absence of the use of free or concession parking, the full schedule of fees is:</p> <ul style="list-style-type: none"> <li>• First 15 minutes Free</li> <li>• &lt; ¼ hr – 1 hr \$3.00</li> </ul>

	<ul style="list-style-type: none"> <li>• 1 hr – 2 hrs \$5.00</li> <li>• 2 hrs – 3 hrs \$6.00</li> <li>• 3 hrs – 4 hrs \$7.00</li> <li>• 4 hrs – 5 hrs \$8.00</li> <li>• &gt; 5hrs + \$10.00</li> <li>• Maximum daily fee \$10.00</li> </ul> <p>Despite the above, the take-up of free and concession parking for staff and visitors has resulted in a daily average capacity / vacancy within the multi-deck car park of the following over the last three months:</p> <ul style="list-style-type: none"> <li>• August = 67 with max daily of 115</li> <li>• September = 74 with max daily of 167</li> <li>• October = 66 with max daily of 184</li> </ul> <p>As is evident from these numbers, free or concession parking exists but is not fully utilised.</p> <p>Once the Acute Services Building the subject of this DA is completed and operational, HI is willing to monitor the level of on-site parking and reassess the circumstances within 18 months.</p>
Further, a review of the plans has identified the following issues.	
Turning circles to be provided for semi-trailer vehicles accessing the loading dock are non-complaint. They demonstrate that there is conflict with the sliding gate and the tree proposed to be retained. These need to be revised and confirmed by the Traffic Consultant.	<p>The swept path drawing of the semi-trailer access to the loading dock has been updated and is attached at <b>Appendix E</b>. This now shows the revised tree locations and does not include the tree shown previously to clash with the turning path.</p> <p>Additionally, the swept path analysis has been revised to no longer clash with any columns or walls within the loading dock.</p>
The heavy vehicles leaving the loading dock will be exiting at the same point as the ambulances. This is not ideal particularly during emergency response.	<p>TTW advises that the loading dock and ambulance bay have separate driveways with clear visibility between them. No overlap between ambulances and heavy vehicles is expected to occur.</p> <p>The updated swept path drawing of the loading dock at <b>Appendix E</b> shows this separation between the ambulance and loading bay.</p>
The visual impact to Shoalhaven Street and the existing residences due to the loading dock is significant and needs to be addressed. Perhaps there is potential to screen this area with landscaping	Further opportunities for planting are able to be explored, subject to civil, traffic and architectural design. Street trees have been maintained along this frontage wherever possible.
The proposed lane for passenger pick up/drop off is not considered appropriate as passing parked vehicles is not possible. The access on to the internal road is also too close to the public road and may cause conflict and be potentially dangerous.	<p>Conrad Gargett has advised that the drop off road at Shoalhaven Street is a secondary access point for staff and public. The road has been designed for safe short-term parking and drop off only.</p> <p>An existing roadway has been utilised to minimise access points from Shoalhaven Street. The internal road connecting into this facility is for maintenance purposes only and would have low usage as a result of this redevelopment with much of its existing traffic now redirected. Therefore, it is unlikely for conflicts to occur and dangerous circumstances have been reduced.</p> <p>By locating the drop off road 6 metres from the boundary line and over 8 metres from the public</p>

	<p>road minimises any potential conflict with public traffic.</p> <p>TTW has further reviewed this and advised that this accessway could be widened by approximately 1.13m to the west (towards the building). This avoids impacting the landscaped area between Shoalhaven Street and the pick-up and drop off facility. This would enable a 2.1m parking lane and a 3m passing lane – as shown below and as part of <b>Appendix C</b>.</p>  <p>This item can be incorporated into the final design prior to construction and a suitably worded condition would be accepted by HI.</p>
<p>The use of decomposed granite within the site for footpaths is not considered appropriate nor a long-term solution. This would likely scour out and create issues for users with mobility issues, cause trip hazards.</p>	<p>Following further development and arborist advice some of the paths have been changed to no fines concrete. There are still some small paths composed of G1 - decomposed granite.</p> <p>These are secondary shortcut pathways designed to prevent "goat tracks" forming in the grass and are an informal alternative to the primary accessible concrete pathway.</p> <p>This is able to be conditioned in this context.</p>
<p>A concrete footpath would be required to be installed along the entire frontage of the development and connect to existing pedestrian pathways. As currently shown, they are not continuous.</p>	<p>As further advised by Moore Trees, a continuous path will be difficult to achieve due to the random nature of the mature tree locations. The other issue, as raised in Moore Trees report as submitted with the EIS, is that there are extensive woody surface roots present, particularly along Shoalhaven Street – see below.</p> 

A pedestrian refuge should be incorporated at the main entry driveway on North Street due to the driveway width proposed.	<p>This can be incorporated through coordination with design team. The driveway will need to be widened to accommodate the pedestrian refuge.</p> <p>Note this has the potential to affect adjacent trees not presently affected.</p> <p>HI is willing to accept a suitably worded condition to address this matter.</p>
<b>Other</b>	
There appears to be an opportunity to install some additional seating (i.e. standalone or incorporated into landscaping) around the landscaped area surrounding the large blackbutt tree for the use of the public and staff for use during lunchbreaks.	These opportunities are able to be explored subject to arborist advice.
Given the amount of outstanding issues and the incomplete consultation conducted as part of the Transport and Accessibility Impact Assessment, Council is not satisfied with providing engineering conditions at this stage as it is believed that many issues remain outstanding and unresolved.	<p>Noted. As set out above HI is willing to continue to liaise with Council but does not support the notion that incomplete consultation ensued.</p> <p>The TfNSW commentary on active and public transport improvements (much of which is outside of the jurisdiction of HI or the LHD) will go a long way to seeking to change travel habits as far as is meaningful or possible for the context of a hospital development. A successful Green Travel Plan as promoted by TfNSW is seemingly a key action to addressing most of Council's concerns coupled with effective usage of the car parks of the hospital.</p>
<b>Transport Engineer Comments/Requirements</b>	
The key transport issues recommended to be discussed further with Council and Transport for NSW and to be addressed with the application can be summarised as:	
Impact on Parking. Council disagrees with many of the statements in the Transport and Accessibility Impact Assessment and its conclusion; and is very concerned about the current parking and safety problems and how this will be exacerbated by the proposal.	Noted. See further related commentary below addressing the detailed commentary made on these matters.
Impact on Amenity. This relates to the current parking and safety problems (how the hospital impacts the surrounding neighbourhood) and how this will be exacerbated by the proposal.	
There is concern there is no commitment to resolving the parking problems onsite, nor is there any commitment to mitigating the impacts of parking sprawl in the surrounding neighbourhood (i.e. inadequate infrastructure, vehicle damage to verges, lack of kerb and guttering, paths and lighting etc.).	
There is concern the Transport and Accessibility Impact Assessment identifies a strategy of quantum shift to alternative transport modes (i.e. to public and active transport) and there is a commitment to provide 90 bike racks onsite, yet no commitment to improve any of the active transport linkages to the hospital from the surrounding area.	
Council would expect that the application incorporates solutions to address these issues.	
The following recommendations are made to address transport impacts:	
Increase the existing multi-storey carpark by 2-storeys (4 levels), to create an additional 130 spaces.	This appears counterintuitive to two aspects of the TfNSW submission relating to a successfully implemented Green Travel Plan and other active and public transport upgrades: as well as the



	<p>notion that (additional) spare capacity will be created within the multi-deck car park due to lack of use.</p> <p>Maximising on-site parking with additional parking spaces is contrary to parts of the discussions held with Council and TfNSW and in particular contradicts commentary made at that time by TfNSW about a preference for a focus on promoting active and public transport to and from the hospital.</p> <p>Notwithstanding, the EIS did indicate that the multi-storey car park has been future-proofed to allow additional 2 storeys (4 split deck levels) to be constructed, which would provide an estimated 136 additional spaces (subject to detailed design). This should, however, not be taken as any commitment to providing this as part of this DA or in the near future.</p>
Build an additional new multi-storey carpark (5.5 storeys, or 11 levels), to create an additional 358 spaces (i.e. construct between the existing multi-storey carpark site and the proposed development, including pedestrian linkages between both carparks and the proposed new building).	As above. This is a significant level of investment in the hospital that may not concurrently satisfy the CSP nor the themes in Council's resolution around dedicated funding towards, and ultimately provision of, important clinical services.
Make both multi-storey carparks "free parking". Only this will ensure higher utilisation.	As set out earlier, the existing multi-deck car park is operating at free and/or concession rates with spare capacity. The basis of fee-related parking is a State-wide policy.
A balance of 2-hour parking and all-day parking can be employed in both facilities to ensure responsible and practical utilisation of the multi-storey car parking facilities. This is essential to minimise the parking impacts on-street.	Consistent with TfNSW's submission the desire would be to reduce demand for on-site parking rather than further encourage a private car mode share increase. As noted, spare capacity remains despite free (or concession-based) parking over the vast majority of the past two years or so.
Construct kerb and guttering in Colyer Avenue (i.e. missing sections) and provide full length footpath (west side).	This location is remote from the immediate hospital perimeter and unrelated to the hospital site. It is presumed that Council is already collecting development contributions within Area 1 with the purpose of providing such roadworks or otherwise seeking those upgrades works via development that directly abuts those road reservations.
Complete kerb and guttering in West Street, west side (Junction Street to North Street), and provide shared user path (west side).	As set out immediately above.
Construct kerb and guttering in Westhaven Avenue (full length, Shoalhaven Street to West Street).	As set out immediately above.
Construct Shared User Path full length North Street (Scenic Drive to Shoalhaven Street).	This is already generally proposed and required of the approved DA for the relocated pre-school.
Construct Shared User Path full length Shoalhaven Street (North Street to Scenic Drive).	This is already generally proposed, noting the surface material is likely to vary, and the alignment be variable, due to the presence of trees to be retained, especially their surficial root systems.
Construct raised threshold with pedestrian refuge North Street (immediately west of West Street).	Noted. HI would support inclusion of a suitably worded condition.
Construct raised pedestrian crossing Shoalhaven Street (i.e. frontage of development, location to suit new building main pedestrian access location, utilise one of	Noted. HI would support inclusion of a suitably worded condition.

the available existing street lighting locations in this vicinity).	
It is requested that all external works, including all regulatory signs/lines, be referred to the Shoalhaven Traffic Committee for approval.	Noted, remembering that any matters subject to s138 of the Roads Act 1993 would be expected to require further Council approval consistent with the SSD status of the application and its consent.
<b>Floodplain Unit Comments/Requirements</b>	
<b>Flooding</b>	
The proposed site is not affected by a PMF event in the Lower Shoalhaven River.	Noted. An overland flow path is provided for the upstream catchment and the site's catchment.
Council has not completed a Flood Study that investigates overland flow in the Nowra area. Section 3.2 of the Stormwater and Flooding Assessment notes that overland flow paths may pass through the site given the land slopes towards the east. The potential location of critical overland flow paths in a local catchment PMF event should be investigated and considered by the civil design as required.	<p>Bonacci has checked extreme event flows and the required freeboard will be able to be provided.</p> <p>The bund adjacent the existing carpark (near the headwall) will direct flows from upstream catchments away from the new hospital entry.</p> <p>Once directed past the "top" of the access road that enters the carpark, the bund will direct flows into the new access road which is capable of conveying the flows to the street network.</p> <p>Should the kerb overtop, the existing flow direction (i.e. east towards Shoalhaven street) will be maintained. The flows will pass south of the new building (which is protected by mounding and ramp to the ambulance bay).</p>
It is noted that Chapter G9, SDCP 2014 requires buildings that need special evacuation consideration (including hospitals and health services facilities) to have a minimum floor level at or above the PMF. Whilst the site is not affected by a riverine PMF event, the minimum floor levels should be located above a local catchment PMF level if there was a critical overland flow path that impacts the site.	Bonacci advises that this comment is also addressed by the above.
The Stormwater and Flooding Assessment refers to the updated Lower Shoalhaven River Flood Study being prepared by Cardno. It is noted that this Flood Study has not yet been completed or adopted by Council and only a draft revision has been made available to the public. Hence the findings from this draft Flood Study report should not be used to support proposed developments at this stage.	Noted, however as it is publicly available and the most contemporary information until formal advice is available, it provides the best data from which to estimate or predicted any impacts.
<b>On Site Detention (OSD)</b>	
OSD has been proposed to reduce post-development peak flows to less than predevelopment levels. The inclusion of OSD is considered crucial by Council to ensure the development does not result in adverse flood impacts to existing downstream properties.	Noted.
The OSD has been sized for the 5% and 1% AEP events only. It is noted that SDCP 2014 requires OSD to consider the 20%, 5% and 1% AEP events. Modelling should also be completed for the 20% AEP event to ensure there are no adverse flood impacts in this event which is used to size the minor piped stormwater network. The capacity of the existing stormwater network immediately downstream of the site should also be assessed to ensure it has adequate capacity for the 20% AEP event without surcharge into overland flow paths.	Bonacci advises that it has checked its modelling and that it has been undertaken for 20% storm and post-development flows. These are less than for the pre-development scenario. This is the case for all storms up to 1%. As flows are reduced compared to pre-development, there will be reduction in the flows to the Council system in 20% event. If Council's system is presently not capable of taking existing a 20% flow, then conditions will be improved post-development - however it is noted that it is not the remit for the project to

	upgrade downstream networks when the flows have been reduced, and the connection to the existing network is maintained at same (or lower) capacity.
DRAINS has been used to size the OSD tank and this modelling approach is supported by Council.	Noted.
<b>Water Sensitive Design (WSUD)</b>	
The pollutant reduction targets documented in Section 4.1.3 of the Stormwater and Flooding Assessment are incorrect and from a historic version of Chapter G2, SDCP 2014. The TSS, TP and TN reduction targets are 80%, 45% and 45% respectively. There are also gross pollutant targets included in Chapter G2.	Bio-retention and pit baskets will ensure that TSS meets targets. Bonacci confirms that the Water Quality model has been re-run and complies with the requirements of Council as noted under ESD.
The stormwater treatment strategy comprises a 210kL rainwater tank (for coolant tower reuse), OceanGuard pit baskets and StormFilter cartridges. These devices are considered acceptable in private property as has been proposed.	Noted.
It is important that the rainwater tank internal reuse demand is appropriately selected for use in the MUSIC Model. It is also important that appropriate conditions are provided to ensure that the stormwater treatment devices are inspected and maintained in accordance with best practice industry guidance (such as the Guidelines for the Maintenance of Stormwater Treatment Measures, Stormwater NSW) to ensure the pollutant reduction targets are achieved in practice.	Noted. HI would support inclusion of a suitably worded condition.
Section 4.1.1 of the Stormwater and Flooding Assessment also notes that a rain garden is proposed between the carpark and building entry. This bioretention device however is not included in the MUSIC Model Schematic in Figure 4-3. It is important that appropriate conditions are provided to ensure that the rain garden is inspected and maintained in accordance with best practice industry guidance.	Noted. HI would support inclusion of a suitably worded condition.
<b>Environmental Assessment Officer Comments/Requirements</b>	
<b>Biodiversity Development Assessment Report (BDAR)</b>	
The BDAR has been prepared using the planted native vegetation – streamlined assessment module (Appendix D of the Biodiversity Assessment Method (BAM) 2020). An assessment of requirements for applying the Planted Native vegetation assessment module is provided in Section 3.3 of the BDAR and a map of the verified vegetation on the site is in Figure 4.	Noted.
Following a site inspection on 24 October 2022, and a review of the relevant documents and databases, Council concurs that the trees within the development footprint are planted, and the proposed development meets the requirements to be assessed in accordance with the planted native vegetation streamlined assessment module.	Noted.
It is noted that remnant native vegetation has been identified outside of the development footprint (PCT 1209). Eco Logical Australia Pty Ltd has determined that this vegetation will not be impacted by the proposed development. Council agrees with this determination if appropriate mitigation measures are implemented during construction. The remnant native vegetation has been mapped within the proposal footprint in some small areas (proposed roundabout),	Noted. HI would support inclusion of a suitably worded condition.

however, this is due to overhanging canopy of large trees that will be retained.	
Eco Logical Australia Pty Ltd conducted a general habitat survey and vegetation assessment on 18 November 2021 and 29 January 2022 and did not record any threatened species using the site during their surveys or record any significant habitat features such as hollow bearing trees within the vegetation to be removed. It has been noted that the vegetation to be removed may provide occasional foraging habitat for wide-ranging threatened species, including Square-tailed Kite, Little Lorikeet, Ganggang Cockatoo, Grey-headed Flying-fox and several microbat species. Council agrees with this assessment. No species credits are required when applying the planted native vegetation streamlined assessment module.	Noted.
Eco Logical Australia Pty Ltd has provided a summary of the measure applied to avoid and minimise impacts to biodiversity values. These measures include retaining the remnant native vegetation within the southern part of the lot that contains hollow bearing trees and higher value foraging resources for local native fauna. The proposed development is located within planted native vegetation or existing developed areas and park. Based on this, Council considers that reasonable measures have been taken to avoid and minimise impacts to biodiversity values.	Noted.
The BDAR has assessed (Table 4) potential prescribed impacts described in Section 6.1 of the Biodiversity Conservation Regulation 2017. Eco Logical Australia Pty Ltd has determined that the proposal will only have minimal impacts to connectivity. Council concurs with this conclusion as the vegetation to be removed provides minimal connectivity to surrounding scattered vegetation or bushland areas in the broader landscape. No additional biodiversity credits are recommended to offset additional prescribed biodiversity impacts.	Noted.
A map of the proposed impacts is provided in Figure 11 of the BDAR. No biodiversity credits are required to be offset with the application of the planted native vegetation assessment module. Section D.2 of the BAM 2020 requires the assessor to provide measures to mitigate or minimise impacts to threatened species and biodiversity values. Mitigation measures are provided in Sections 7.3 and 7.4 of the BDAR. These measures will be incorporated into recommended consent conditions.	Noted and as set out below.
<b><i>The following conditions of consent are recommended.</i></b>	
<b><u>Native Vegetation and Habitat</u></b> The removal and/or disturbance of native vegetation and habitat on the property, including canopy trees, understorey and groundcover vegetation, is restricted to that required to construct and maintain the development in accordance with the approved plans	Noted. HI would support inclusion of a suitably worded condition.
<b><u>Retention or Vegetation Within the Approved Asset Protection Zone</u></b> Trees and other vegetation must be retained within the Asset Protection Zone (APZ) where it complies with the prescriptions for Planning for Bushfire Protection APZ guidelines.	Noted. HI would support inclusion of a suitably worded condition.

<p><u>Ecological consultant – Engagement</u> Prior to the commencement of clearing work, a suitably qualified and licensed ecological consultant with wildlife handling experience must be engaged to guide and supervise the clearing work and protection of environmental features on the site. Evidence of engagement must be submitted to Council.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Project Arborist- Engagement</u> Prior to the commencement of clearing work, a suitably qualified and practicing Level 5 Project Arborist that has current membership with either Arboriculture Australia (AA) or Institute of Australian Consulting Arboriculturists (IACA) must be engaged to guide and supervise the clearing work and ensure the Tree Protection Report (prepared by Moore Trees) is implemented accordingly. Evidence of engagement must be submitted to Council.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Tree Protection</u> Prior to the commencement of any clearing works the following requirements must be met to the satisfaction of the Certifier: a) To ensure the protection of trees affected by the proposed development, trunk protection is required for all trees to be retained and a temporary protective barrier or similar visible material must be installed in accordance with the approved Tree Protection Plan and retained until all work are complete.  b) The dripline of trees to be retained must be clearly identified and protected with temporary barrier fencing in accordance with AS 4970: Protection of trees on development sites.  c) The Project Arborist must certify the protection measures are installed to the required specifications prior to commencement of construction. The trunk protection should remain in place for the duration of construction.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Identification of Environmental Features</u> Prior to the commencement of any clearing work, a suitably qualified ecological consultant must identify and physically mark environmental features to be retained, as shown on the approved plans.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Inspection of Tree Protection Measures</u> Shoalhaven City Council must inspect and certify in writing that tree protection measures are in place before any work on site can commence.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Erosion and Sediment Control</u> Prior to the commencement of any works, the approved erosion and sediment control measures must be implemented by the contractor and inspected and approved by the PCA prior to the commencement of any other site works. The erosion and sediment measures must be maintained for the life of the construction period and until runoff catchments are stabilised.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Timing of Works- Pre-Clearance Survey</u> To protect potential nesting fauna, tree removal works must only occur after a preclearance survey is undertaken by the engaged ecological consultant that</p>	<p>Noted. HI would support inclusion of a suitably worded condition, noting that if 'within the property boundaries' refers to the whole hospital and former park site, there are many trees that will be retained</p>

conclude no fauna is occupying/nesting or denning within any trees located within the property boundaries.	and may support nesting fauna that won't necessarily be adversely affected by tree clearing works. It is recommended that the wording of this condition is modified to be as follows:  To protect potential nesting fauna, tree removal works must only occur after a preclearance survey is undertaken by the engaged ecological consultant that conclude no fauna is occupying/nesting or denning within any trees <b>proposed to be removed that are</b> located within the property boundaries.
<u>Tree Protection- Monitoring</u> The Project Arborist must inspect all trees to be retained bi-monthly to ensure tree protection measures are being adhered to and the health of all trees is not being adversely affected.	Noted. HI would support inclusion of a suitably worded condition.
<u>Tree Protection- Exclusions Within the Tree Protection Zone</u> The following activities shall be excluded within the TPZ: a) Excavation, compaction or disturbance of the existing soil.  b) The movement or storage of materials, waste or fill.  c) Soil level changes.  d) Disposal and runoff of waste materials and chemicals including paint, solvents, cement slurry, fuel and oil.  e) Other toxic liquids.  f) Movement or storage of plant, machinery, equipment or vehicles.  g) Construction access points  h) Position of site sheds and latrines and temporary services  i) Any activity likely to damage the trunk, crown or root system of the trees.  The Project Arborist must be notified in the event any disturbance within the TPZ of trees to be retained is required.	Noted. HI would support inclusion of a suitably worded condition.
<u>Project Arborist- Supervision</u> The catch drain (CD) proposed along the eastern boundary near trees to be retained will require project arborist supervision and guidance to ensure remnant trees are retained safely.	Noted. HI would support inclusion of a suitably worded condition.
<u>Vegetation Removal Protocol</u> a) To protect wildlife occurring within the site, all clearing works are to be supervised by a qualified consultant ecologist experienced in wildlife handling and rescue.  b) All vehicles and mechanical plant must be inspected for wildlife prior to operation.	Noted. HI would support inclusion of a suitably worded condition.



<p>c) Vegetation is to be removed using a staged approach to allow wildlife to naturally flee the area.</p> <p>d) All vegetation to be removed must be inspected for wildlife prior to removal.</p> <p>e) Trees to be cleared must be felled into the development area carefully so as not to damage trees to be retained in or beyond the development footprint.</p> <p>f) If any wildlife is disoriented or injured during clearing works, works must stop immediately, and the consultant ecologist is to advise and responsibly rescue and relocate the animal(s).</p> <p>g) In the event of an unexpected find of a threatened species, works must stop immediately, and the developer and consultant ecologist must call Council's Environmental Assessment Officer to determine whether additional assessment is required.</p> <p>h) Within 10 days of completing clearing work, the engaged consultant ecologist must provide to Council written evidence of any fauna detected during clearing</p>	
<p><u>Wildlife Protection Measures</u></p> <p>a) All vegetation to be removed must be inspected for wildlife prior to removal. All structures proposed for demolition may provide habitat for microbats and other native wildlife and must be inspected prior to removal.</p> <p>b) Works must cease until any wildlife present has relocated.</p> <p>c) All vehicles and mechanical plant must be inspected for wildlife prior to operation.</p> <p>d) All trenches must be inspected for wildlife prior to backfilling</p> <p>e) Any injured wildlife must be referred to a local Veterinary Clinic or into the care of Wildlife Rescue South Coast (0418 427 214).</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Timing of Works</u></p> <p>To protect adjoining bushland, works involving soil disturbance must not take place during heavy rainfall periods, other than work necessary to stabilise the site.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Trenching Requirements</u></p> <p>A small playground area is proposed between Trees 40 and 46. Any trenching for services such as for new lighting and/or water fountains shall be kept outside of any TPZ area of adjoining trees.</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>
<p><u>Tree 50 Tree Protection Requirements</u></p> <p>a) Existing soil levels are to be retained within the TPZ of Tree 50 and the pedestrian path is designed so that water does not pool within the TPZ area (See Note 1, Tree Protection Plan). The entire area under the drip line of Tree 50 should be planted out as garden area (Plate 12) in order reduce the element of risk from limbs that may fail from a tree of this age. The current</p>	<p>Noted. HI would support inclusion of a suitably worded condition.</p>

plans show the area being turf (See Note 2, Tree Protection Plan).	
b) A flat bucket excavator shall be used to excavate the trench within the TPZ of Tree 50 to ensure no roots greater than one hundred (100) millimetres are severed. Roots greater than one hundred (100) millimetres will be retained and the pipes threaded under the roots. A spotter shall be used for these works to ensure roots greater than one hundred (100) millimetres are retained and the canopy of Tree 50 is not impacted. The Project Arborist shall supervise these works.	
<u>Tree 74- Project Arborist</u> Tree 74 may be possible to retain however this will need to be determined once the driveway excavations commence. If woody roots are required to be severed, then Tree 74 may require removal. The Project Arborist should be consulted to make this decision.	Noted. HI would support inclusion of a suitably worded condition.
<u>Stockpiling Areas</u> Any area set aside for the stockpiling of soil and waste shall have the appropriate erosion control measures around this area as specified by an engineer. These erosion control measures shall be monitored and maintained regularly throughout the construction period of the site. These measures are to restrict any waste material entering the TPZ areas of the trees to be retained.	Noted. HI would support inclusion of a suitably worded condition.
<u>Potential Tree Damage</u> If the retained trees are damaged, the Project Arborist should be contacted as soon as possible. The Arborist will recommend remedial action so as to reduce any long-term adverse effect on the tree's health.	Noted. HI would support inclusion of a suitably worded condition.
<u>Root Pruning</u> If excavations are required within a TPZ this excavation shall be done by hand to expose any roots. Any roots under fifty (50) millimetres in diameter may be pruned cleanly with a sharp saw. Tree root systems are essential for the health and stability of the tree. Severed roots shall be treated with Steriprune®, available at most large Hardware Stores.	Noted. HI would support inclusion of a suitably worded condition.
<u>Tree Protection- Final Certification</u> Upon completion of construction the Project Arborist will certify that the health and condition of all trees to be retained have not been adversely affected by the development.	Noted. HI would support inclusion of a suitably worded condition.
<u>Landscaping</u> For the life of the development: a) Landscaping must be maintained in accordance with the approved Landscape Plan. b) The planting of plant species listed in the South East Regional Strategic Weed Management Plan 2017 – 2022 is prohibited.	Noted. HI would support inclusion of a suitably worded condition.
<b>Property Services Comments/Requirements</b>	
An easement for water supply located in the south east corner of Lot 104 DP 1165533 and adjacent to the eastern boundary is being negotiated for realignment with Council's Shoalhaven Water. Extinguishment / realignment is being managed by Shoalhaven Water.	Noted.

<b>Shoalhaven Water Comments/Requirements</b>	
A water development Notice application is required from Shoalhaven Water.	Noted.
A certificate of compliance will be required once all Shoalhaven Water related works are completed.	Noted.
Detailed hydraulic will need to be submitted for review.	Noted.
Servicing plan for water connection is required and Water meter application.	Noted.
Water connection for fire services needs to be detailed.	Jacobs has advised that it believes suitable information has been detailed. In any case this can be suitably resolved via a condition.
Watermain relocation required prior to commencement of works.	Noted.
Section 64 fees are applicable.	Noted. HI would support inclusion of a suitably worded condition.
Liquid trade waste and backflow prevention will be required.	Noted.
Any application will need to demonstrate that the new building can drain to sewer via gravity. Designs will be required if not possible.	Noted.
<b><i>The following conditions of consent are recommended.</i></b>	
A Certificate of Compliance must be obtained to verify that all necessary requirements for matters relating to water supply and sewerage (where applicable) for the development have been made with Shoalhaven Water. A Certificate of Compliance must be obtained from Shoalhaven Water after satisfactory compliance with all conditions as listed on the Notice of Requirements and prior to the issue of an Occupation Certificate, Subdivision Certificate or Caravan Park Approval, as the case may be.	Noted. HI would support inclusion of a suitably worded condition.
Prior to the Commencement of any works, all conditions listed on the Shoalhaven Water Notice of Requirements under the heading "Prior to the Commencement of Any Works" must be complied with. Written notification must be issued by Shoalhaven Water and provided to the Certifier.	Noted. HI would support inclusion of a suitably worded condition.
<b>Shoalhaven Water – Certificate of Compliance</b> Prior to the issue of any Occupation Certificate, a Certificate of Compliance under section 307 of the Water Management Act 2000 must be obtained from Shoalhaven Water to verify satisfactory compliance with all conditions for the supply of water and sewerage, as listed on the Notice of Requirements. If the development is to be completed in approved stages, or application is subsequently made for staging of the development, separate Compliance Certificates must be obtained for each stage of the development.	Noted. HI would support inclusion of a suitably worded condition.
<b>Environmental Health Officer Comments/Requirements</b>	
Consideration should be given to the impact of the proposed helipad on sensitive receptors through the design and location of the helipad. AS20121 uses Australian Noise Exposure Forecast (ANEF) charts and contour maps that forecast aircraft noise levels. AS2363 – Acoustics – Measurement of noise from helicopter operations (withdrawn) provides guidance on the assessment of helicopter noise. Environmental Principles and procedures for Minimising the Impact of Aircraft Noise (AirServices Australia 2022) and the Guidelines for the establishment and operation of on-	<p>As noted, CASA has no concerns with respect to helicopter movements at the hospital site, noting these movements presently exist and will be largely returned to the site once construction is completed, albeit at a higher level given the rooftop helipad.</p> <p>Again, with respect to helicopter noise as set out in the EIS, and in AviPro's and Acoustic Logic's reports, the proposed helipad will be at least 30m above ground level and in a similar location to the existing helipad. The elevated helipad location</p>

shore helicopter Landing Sites (CASA Civil Aviation Advisory Publication (CAPP) 92-2(2), 2014; should be considered.	<p>means that there would be additional distance separation to the ground receivers and therefore, assuming similar flight paths are used, future helicopter noise levels would be reduced.</p> <p>Relevantly, noise emissions from emergency aircraft operations are not assessed in the same way as commercial aircraft. Similar to ambulance operations on roadways, noise limits are not typically applied to receivers around an emergency helipad.</p> <p>Australian Standard AS2021-2015 "Acoustics- Aircraft noise intrusion- Building siting and construction" provides noise acceptability for commercial aerodromes and airports. This standard indicates it should not be used to assess emergency operations. Notwithstanding, noise from helicopters using the proposed new helipad would be compared the existing noise levels.</p>
The recommendations outlined in the Preliminary Site Investigation (PSI) should be undertaken, noting that a Preliminary Environmental Site Assessment (PESA) is recommended and if required a Detailed Site Investigation (DSI).	<p>Cardno prepared the following reports with respect to the site and development:</p> <ul style="list-style-type: none"> <li>• Preliminary Site Investigation</li> <li>• Environmental Site Assessment</li> <li>• Data Gap Investigation</li> <li>• Remediation Action Plan</li> </ul> <p>All were submitted and available for review and assessment.</p>

## Public Submission 1 – Timothy New

Issue	Response
<p>First of all, I would like to mention that I do fully support this project and thank you for your time invested so far into ensuring this project gets underway.</p> <p>I do have four points I would like to put forward in this submission.</p>	<p>Noted.</p>
<p>I understand that NSW Heath will still have provisions for the children's park on the cnr of North and Shoalhaven street and it will be upgraded. Would it be possible that the community could see a detailed scope/ design for the playground rebuild and an budget allocation? The reason I'm asking is that I believe this will be a such an asset to this location and if the playground can be of a decent size and clever inclusive design (Could possibly get some ideas from Boongaree) the newly constructed park at Berry NSW, I believe it will be such a valuable space for families travelling long distances to have treatment at both the Shoalhaven hospital but also the Cancer Clinic. Siblings/ family members can take a time out from the hospital and put a smile on their face with a beautiful/ fun outdoor space. Again, like Boongaree, some native landscaping design around the playground would really make this space be a welcome space for all to enjoy. I was thinking along the lines of sandstone rock sculptures, water fountains, native garden beds, plenty of scattered seating, soft fall, shade/ BBQ gazebo and info on the local flora and fauna. I'm concerned that the</p>	<p>Detailed drawings for the new park area and playground space as well as other relevant information was submitted as part of the DA / EIS package.</p> <p>We agree with the potential for the playground to be a great asset which serves hospital users as well as the broader community.</p> <p>The current design has been developed in line with the budget and briefing provided. The equipment currently incorporates inclusive elements. The playground has been discussed as a possible location for sculptural play items delivered within the public art program which is still being developed.</p>

final product could not be as great as this prominent location deserves. And once the decision is made, it is very hard to make changes after project completion.	
2 - My other concern and second point in my submission, would be to address the roads surrounding the current and proposed site of the hospital redevelopment. I do understand that this is primarily a responsibility of Shoalhaven City Council, but I'm concerned that they will not be able to make proper repairs to these roads as they are so stretched with our current climate/ financially and also large workload. I would imagine that there will be increased heavy vehicle traffic down both Shoalhaven and North streets during the construction process. Cranes, Concrete agitators, semi-trailers, large delivery rigid trucks etc. The current state of the roads is very poor and I'm proposing that NSW Health includes a full upgrade to the sections of Shoalhaven and North Streets – This would be to be constructed of a 'hot mix' style bitumen, not a spray seal on the existing to ensure longevity. We have to take into consideration these roads are vital, as are critical entry/ exit points for Ambulance and patient transport.	Noted. The carrying out of road upgrade works are ordinarily the domain of the relevant authority, whether a Council or TfNSW as the case may be. As may be routinely conditioned, any construction-related dilapidation or damage will be accounted for, as per documentation via a pre- and post-construction dilapidation reporting. Any existing poor conditions of roadways pre-dating development would not be the responsibility of HI or the ISLHD in this instance.
My third point would be to have some consideration into smoking facilities onsite. I do understand that NSW Health have a blanket rule which is NO smoking onsite, I can appreciate this, but when a large volume of visitors, contractors and staff do still smoke cigarettes and unfortunately the place they end up is on the street and the majority of the butts end up on the footpath and gutter. With the Hospitals location so close to the beautiful Shoalhaven River I think that we need to think of a space that smokers can go so we can minimize impact of smoker's rubbish ending up in the river. This would also reduce the impact of non-smokers utilizing the community footpaths, walking dogs or pushing prams having to push through a cloud of secondhand smoke.	That is correct, there is a State-wide policy of no smoking on NSW hospital campuses in addition to other State-based Smoke-Free Laws.  The management of smoking and smokers outside of the hospital is not a development issue directly tied to this DA, rather one that most appropriately relates to the management of designated smoking areas by the ISLHD.
My fourth and final submission point would be a community garden integrated into the design. I believe a community garden would be a huge asset for NSW health, neighboring community preschool, and the local community. A small area of the procured Nowra park be set-aside for raised garden beds/ small shed and paving. The garden could be run by volunteers and ongoing maintenance could be through fundraising. The community preschool could be actively involved, and fresh produce is sent back into the kitchen of the Hospital and preschool.  Thank you for your time and I do hope my submission is considered.	No opportunity for a community garden arises (or is envisaged under this DA) in relation to the hospital's grounds, including any provision of fruit or vegetables to the hospital's kitchen. Infection control processes prevent the provisioning of fresh foods sourced from informal supply.  Community-engagement activities will occur within the proposed park and playground areas from time to time.

## 5.0 UPDATED DRAWINGS AND ASSESSMENT

The nature of the commentary in submissions has not warranted or resulted in any significant change to the architectural, landscape or civil engineering design of the development.

Consequently, no renewed or further assessment of impacts has arisen or been warranted in this regard.

## **6.0 NEW DRAWINGS / DOCUMENTATION FOR APPROVAL**

The only new drawings or documentation provided for the Department's consideration and assessment are those which show or provide:

- Setbacks for the Acute Services Building from Shoalhaven Street.
- Justification for, and/or potential for adjustment to, the Drop-off area off Shoalhaven Street.
- Swept path diagrams for the access to and within the loading dock off Shoalhaven Street.
- A Preliminary Green Travel Plan to be further refined.

## **7.0 CONSIDERATION OF NEW OR DIFFERENT IMPACTS**

As above, no renewed or further assessment of impacts has arisen or been warranted in this regard. The responses to submissions provide adequate information or details with respect to the proposed works and the operation of the hospital once the Acute Services Building is completed.

## **8.0 UPDATED PROJECT JUSTIFICATION**

This Response to Submissions package has addressed all comments made in submissions as well as the Department's letter of key issues. The package provides a detailed and comprehensive response to these matters as supported by further specialist advice or information.

As noted, considerable effort has been undertaken to suitably address each of TfNSW's and Council's submissions through a meeting to better understand the commentary made and through provision of further or updated information as part of this package.

**Appendix B** provides an update of the originally submitted Mitigation Measures having considered and assessed the matters raised in submissions, the response to those matters, and refined information, reports, drawings and the like arising from the submissions or design refinements.

As evidenced by the small number of submissions and the limited range of key issues raised, this Shoalhaven Hospital Redevelopment project remains justified as it will have significant positive social and economic impacts for the locality; to the Shoalhaven LGA and the evolving Nowra health hub / medical precinct; and the Illawarra-Shoalhaven region generally. The environmental impacts are broadly likely to be low to medium only across both the construction and operational phases of the development. Any more significant impacts identified, such as construction noise and traffic, are able to be suitably managed and mitigated to reduce impacts and environmental risks. Operational traffic and parking matters will be able to be suitably monitored and reported on within a meaningful timeframe following the commencement of operation of the Acute Services Building. Parking strategies will be able to be implemented accordingly, if and as may be required.

The continued redevelopment of the campus to future proof capacity at the hospital to cater for population growth, future demand for services, and changed clinical and health needs whilst also providing a modern fit-for-purpose health facility is suitable and justified in the context.

The development satisfies and supports all relevant strategic planning objectives and aims as they relate to the provision of health services, the Shoalhaven LGA and the evolving Nowra health hub / medical precinct, and the Illawarra-Shoalhaven region generally. There are no planning controls, legislative and prerequisite requirements and environmental risks or impediments that would limit or prevent the development as proposed.

The findings of the EIS and its supporting studies and reports (as supported by the Response to Submissions Report) is that the development will generally be of a low impact and with environmental risks relative to the project's scale and complexity. Suitable measures have been proposed throughout to address a range of environmental and operationally-related impacts that would arise from the construction and operation of the development. Ongoing communication with the immediately-affected community is proposed in relation to a number of construction-related impacts, chiefly from



noise, vibration, and traffic management. Monitoring for previously undetected or unrecorded Aboriginal objects and other heritage or archaeology is also planned in dialogue with, and involvement of, the community.

The design and siting of the development has sought to not only meet the immediate clinical and health services needs of the hospital and ISLHD, but also sought to avoid or minimise the impacts of the project, applying mitigation measures where needed or required under legislation.

We maintain the recommendation that the Shoalhaven Hospital Redevelopment be approved.

## **9.0 REFERENCES**

References referred to in this Response to Submissions Report are set out and included as Appendices within Part B of this response documentation.