

26 October 2023

Department of Planning, Industry and Environment
Contact: Patrick Nash

**Council Reference: REQ05657/2023
New Shellharbour Hospital - SSD-57064458**

Dear Sir

I refer to the above State Significant Development Application (DA) currently being assessed by your department and thank you for the opportunity to comment as well as the extension of time.

1. Summary of Council Comments

Shellharbour City Council supports the delivery of the new hospital and congratulates Health Infrastructure (HI) on the design and layout of the hospital. Council's commentary is largely in relation to the external impacts associated with the hospital and ensuring that the provision of this key piece of health infrastructure is combined with the necessary infrastructure needed to support it as well as ensure the impacts on the surrounding community are ameliorated as best as possible.

It is noted that the provision of clinical services forms a significant part of the communities' interest in the new hospital. Council appreciates that there is space for expansion as part of these plans but welcomes any discussions to expand the amount of services available to the community as part of this proposal. The Illawarra-Shoalhaven District is a large population catchment, this proposal represents an opportunity for the provision of centrally located services which can be currently located at the northern and southern ends of the District which can make access difficult for staff and patients alike.

2. Pedestrian Access

Pedestrian access to and from the hospital must be enhanced. The proposed development relies heavily on Council's existing network of footpaths and shared pathways which were not planned to provide access for a development of this nature at this location.

The 'future' pedestrian link directly to the Shellharbour Junction Train Station must be provided as part of this development and should be in place prior to the opening of the hospital. This pedestrian link is critical to encourage transport modal shift away from private vehicles for staff and visitors accessing the hospital via rail. The path must be well lit and provided with landscaping which will facilitate casual surveillance, create a pleasant environment and a safe place.

Additionally, the pedestrian pathway at the north-eastern corner of the site must be designed to result in a safe pedestrian crossing of Dunmore Road to link with the existing shared pathway network on the eastern side of Dunmore Road. There is potential to create a pedestrian refuge area within the painted central median area of the proposed intersection.

The pedestrian pathway on the western side of Dunmore Road should be extended from the proposed bus stop to meet the crossing point referred to in the paragraph above, however it is noted that the presence of electrical infrastructure may prevent this from occurring.

Finally, a shared pathway should also be constructed along the western side of Dunmore Road to the southern extent of the Dunmore Road frontage to allow for a direct connection to future development on the southern adjoining lot.

3. Traffic and Vehicular Access

Traffic forms one of the priority concerns for the community and Council in relation to this development. The impact of the development on traffic noise for sensitive receivers, the school zone for Shellharbour Anglican College and traffic congestion along Dunmore Road, Shellharbour Road and Princes Highway must be carefully considered by the Department of Planning and Environment.

It is queried whether the primary access point will actually be the most used access point given the northern access point will be the first encountered driving to the site southbound along Dunmore Road and it is also the primary service vehicle access point. Measures need to be implemented to encourage the use of the primary access point via the roundabout. Alternatively, it must be confirmed that the northernmost access point's intersection has been designed to accommodate the likely traffic generation associated with being the primary vehicular access and egress point to the main at grade parking area, multi-deck car park and service vehicle area.

It is noted that the recommended intersection upgrade of Dunmore Road and Shellharbour Road forms part of the works to deliver the Project and it is expected that the upgrade of this intersection to signals would form a condition of consent requiring the intersection to be completed before the opening of the hospital. In addition to this intersection upgrade, Council encourages that Health Infrastructure and Transport for NSW continue to assess the potential for direct access to and from the Princes Highway.

However, as advised regularly at the Hospital Traffic Working Group, Council's preferred option is a grade separated interchange from the Princes Motorway, across the railway line into the hospital. Council has written the Health Minister recently reiterating this request, see attachment 1 for a copy of this correspondence.

There is a lack of commentary in the Traffic Impact Assessment or Construction Management Plan in relation to impacts on Shellharbour Anglican College during construction and operation. Any Traffic Management Plan should require deliveries and large vehicle movements to avoid school zone pick up and drop off hours, where possible, as well as include other mitigation measures to prevent impacts on the school in terms of traffic and child safety both during construction and operation.

It is noted that assumptions in the Traffic Modelling and Traffic Noise Generation Assessment compares the impact of the development to a residential subdivision of the site. Any modelling for this proposal should be based on the gross traffic volume generated by the hospital and not the net increase compared to a potential residential subdivision of the land.

Recommendations:

- The developer provide a grade separated interchange from M1 Princes Motorway with a secondary access from Dunmore Road. This would reduce travel times and potentially save an emergency vehicle travelling an additional 2.8km, through a 40kph School Zone and residential areas to access the hospital. This will greatly assist emergency response by avoiding local streets, particularly for those emergencies to the south of Dunmore.
- The developer investigate increased off-street parking provision by a minimum of 50%, for staff and visitors to the site, given its remote location away from suitable public transport options, with the Shellharbour Junction Train Station approximately 1.5 km away from the new hospital site.
- The developer be required to provide on street angled parking (45 degree) along its Dunmore Road frontage for its entire length.
- The developer be required to remedy existing failed/failing sections of Dunmore Road to enable the significant increase in traffic movements
- The developer be required to provide left slip lanes (in and out) of Dunmore Road at Shellharbour Road to facilitate more efficient traffic movements on Dunmore Road.

4. Amenity

Potential amenity impacts on existing and proposed development especially sensitive receivers nearby the site are also key concern for Council. It is noted the Preliminary Construction Management Plan and Noise and Vibration Assessment includes requirements to limit the impacts on nearby residences during construction including parking for workers to be located onsite, acoustic protection and vibration limits. However, the assessments do not include any mitigation measures for operation beyond building material recommendations for the hospital such as glazing requirements. It is questioned whether acoustic mitigation is required especially for increased traffic and ambulances accessing the development.

5. Bulk Earthworks – DA0606/2022 (as modified by DAM0065/2023)

Council has approved bulk earthworks on the subject site which also involves the stock piling of material on the adjoining site to the south. Health Infrastructure have committed to ensuring that the stockpiled material on the southern adjoining site will be utilised during the construction of the hospital and the stockpiles will therefore not remain onsite or be required to be trucked offsite. This is reflected in conditions of consent for the approval which limit the number of truck movements and require the stockpiles to be removed as follows:

“The stockpiles approved on Lot 1 are approved subject to the use of stockpiled material for filling/reuse operations on Lot 10 during bulk earthworks and the development of a future health services facility.

Prior to the occupation or use of any future health services facility on either lot, Lot 1 is to be returned to its original state in terms of land form and revegetated (i.e. removal of the stockpiles approved under this modified consent, and the area seeded with

grass) unless alternative land forms or landscaping for lot 1 is approved or agreed in writing by Council.”

It is recommended that the Department of Planning impose similar conditions to ensure the stockpiled material is used in the construction of the project to prevent the trucking of material into the site or offsite. This has the potential to be a major source of truck movements with associated traffic, amenity and safety impacts. Alternatively, a condition of consent should be imposed to remove the stockpiles and the impacts associated with the trucking of material offsite should be considered as part of this SSDA.

6. Water Quality – Sediment and Erosion Control and Water Sensitive Urban Design (WSUD)

A key consideration during the assessment of the bulk earthworks Development Application was in relation to sediment and erosion controls including the provisions of necessary basins. This is especially important due to the site being located within the catchment for the Minnamurra River. The Department must ensure that necessary controls are included in the subject development to ensure there will be no impacts during construction and operation of the hospital. Particularly water quality measures must be built in to ensure there is no impact from run off generating by the development through the treatment of suspended solids, phosphorus and nitrogen in accordance with industry standards. The use of oil water separators or SPEL puraptors (or similar) devices should also be considered for the stormwater catchments containing the large areas of car parking.

7. Nearby Residential Subdivisions Under Assessment

Council has recently received applications for the residential subdivision of the adjoining land to the north (DA0405/2023) as well as the land on the south-eastern side of the intersection of Dunmore Road and Shellharbour Road (DA0411/2023). These applications are currently on public exhibition and full details are available on Council's website.

These subdivisions should be included in the traffic modelling and acoustic assessments for the proposed development.

Additionally, it should be noted that Council staff have suggested that larger lots along the shared boundary with the hospital site should be provided. These lots would be for the purposes of providing private health services facilities with a view towards the creation of a health precinct in this location. This will also provide a buffer to potential residential development to the north, reducing land use conflict and amenity impacts from sensitive land uses directly adjoining the hospital site. Council encourages discussions between the developer to the north and HI with a view to sharing access to these potential future health services lots along the northern side of the northernmost access point to the hospital.

8. Social Impact – General Commentary

Council has a statutory obligation under Section 4.15 of the Environment Planning and Assessment Act to consider the social impact of all development proposals. Shellharbour City Council's Social Impact Assessment Policy 2022 aims to maximise the quality of life of existing and future residents through the identification and, where necessary, the mitigation of social impacts related to the implementation of Council policies/strategies or specific development applications. This hospital will have an array of positive impacts for the

community including service provision, employment and proximity to public transport. There are a number of other factors, however, that need to be further considered.

Recommendations:

- The developer needs to ensure safe connections within and around the development to enhance active transport and walkability. This will reduce traffic congestion.
- This area is incredibly busy, particularly during school drop-off and pick-up times due to the proximity to Shellharbour Anglican College, train station as well as the new child care centre in Dunmore, Junior Einsteins (and another child care centre proposed for this area too). This area is only going to become more congested as more residential development is completed. It is crucial that there another access road into the new hospital site from the highway which can accessed from the north and south. Without this, it will lead to increased traffic in the area which will create negative impacts for those residents in the area, individuals travelling in the area and emergency vehicles and individuals trying to access the hospital. This poses a huge social impact and safety risk if this is not included as a crucial element of this development.
- As identified in the Social Impact Assessment, the provision of key worker housing needs to be considered either onsite or nearby.
- It should be noted that The Links Tavern is in close proximity to the new hospital site and may pose a risk, particularly since there is a drug and alcohol treatment facility included at the hospital.
- The Visual Impact Assessment states that the hospital site location was selected based on a number of factors, including future expansion. This needs to be carefully considered in terms of the impact on surrounding community and communicated if there are already known expansion plans.
- Consider the inclusion of electric vehicle charging stations within the car parks.
- Ensure there is a safe, connected and accessible pedestrian access from Dunmore Road into the main entrance of the hospital.
- Look at the inclusion of youth-friendly landscape elements in the youth space.
- Ensure dementia-friendly by design principles are adhered to.
- Consideration around the inclusion of a sensory garden within the site, potentially in the older persons courtyard space. There is strong evidence supporting sensory gardens and the positive impact this can have on physical and mental wellbeing.
- Ensuring pedestrian routes are accessible for older people, those with a disability or dementia are paramount. Design should address issues such as the provision of even and well-defined walkway surfaces and gradients, accessible seating and the detailing of kerbs, ramps, handrails, signage and lighting.
- Paths and paving:
 - Make paths and paving uniform in colour and texture or provide safe transitions between different colours and textures.
 - Colour contrast paths with their immediate surrounds.
 - Clearly distinguish borders for increased visibility.
 - Ensure paths are level and hazard free.
 - Think about small unit blocks and pavers, which are appropriate for small gardens.
 - Note that small unit pavers are less likely to cause trips than slabs and are easier to lay in curved shapes.

- Note that block pavers and paving slabs laid in a broken bond pattern, rather than a grid pattern, are less likely to cause trips, especially for people using walking frames.
- Provide handrails where appropriate.
- Provide rest areas and seating next to paths.

9. Community Protection through Environmental Design (CPTED)

In April 2001, the NSW Department of Infrastructure, Planning and Natural Resources (former Department of Urban Affairs and Planning) introduced Crime Prevention Legislative Guidelines to Section 4.15 of the Environmental Planning and Assessment Act, 1979. These guidelines require consent authorities to ensure that development provides safety and security to users and the community. 'If a development presents a crime risk, the guidelines can be used to justify modification of the development to minimise crime risk, or, refusal of the development on the grounds that crime risk cannot be appropriately minimised.' There are strong concerns around increased crime as a result of this development, particularly on the route from the train station to the hospital as well as the increased number of people who will be around the hospital site during the day and night. This may lead to increased crime affecting the surrounding residents as well as other facilities in close proximity, including Shellharbour Anglican College.

The objective "to see and be seen" is important in developments. The developments included should have unobscured outer perimeters to encourage natural surveillance and the perception of safety in the area.

The applicant should refer to Council's Development Control Plan, Section 17.3 Landscaping which states:

"17.3 Landscaping

Objective is to facilitate casual surveillance, create pleasant environments and safe places in both public and private.

17.3.1 Street trees should not be dense trees and should have high canopies to allow for natural surveillance from buildings to roads and pedestrians.

17.3.3 Large trees should not be planted next to buildings to limit access to the building as they may create a natural ladder and limit surveillance.

17.3.5 Planting within 5 metres of a pedestrian pathway should be lower than 1 metre or thin trunked with high canopy to encourage safety and surveillance.

17.3.6 Trees within the car parks should be avoided as they may obstruct lighting, sight lines and passive surveillance from pedestrians and motorists. They may also create entrapment and concealment areas increasing the risk of crime.

17.3.7 Trees in the middle of sites should be avoided as they will obstruct sightlines and surveillance especially in parks and public spaces. With the exception of trees with high canopies which will not obstruct sight lines.

Recommendations:

- Ensure the main foyer and circulation spaces are unobstructed by structures to remove opportunities for concealment and ensure sightlines are provided to and from the development.
- A CCTV network strategy should be provided and also partnered with an internal and external lighting strategy to ensure facial recognition is achieved in all lighting conditions and an appropriate colour rendering index is achieved.
- To maintain sightlines to and within the development, it is recommended that plant species not exceed a mature height of 500mm above ground level, or in the case of trees, should achieve a minimum canopy height of 1.8m when mature.
- Maximise sightlines within and into car parks by avoiding mid-level dense vegetation, however, it is important to ensure that a person cannot conceal themselves within the vegetation.
- Avoid medium height vegetation with concentrated top to bottom foliage. Plants such as low hedges and shrubs, creepers, ground covers and high-canopied vegetation are good for natural surveillance.
- Avoid vegetation which conceals the building entrance from the street.
- Ensure paths to and from car parks provide appropriate lighting, signage, landscaping and other sightlines.
- Question around the inclusion of the artificial turf mound in the adult courtyard space and the purpose of this as this may restrict natural surveillance in this area.
- Encourage passive surveillance from the hospital building windows into the landscaped areas and courtyards.
- Large trees should not be planted next to buildings to limit access to the building as they may create a natural ladder and limit surveillance.
- Bicycle parking should be located within view of capable guardians.
- The selective planting of prickly vegetation can restrict access through gardens and protect vulnerable windows, ledges and building openings.

10. Lighting

It is recommended that a lighting strategy be provided with the development application. It is recommended that the applicant consider the following factors to optimise crime prevention when installing lighting.

Recommendations:

- Lighting should enable users to identify a face from within 15 metres to assist with personal safety
- Use white toned LED lights instead of yellow toned lights to promote sustainability, encourage the feeling of safety, minimise visual distortion and increase lighting distribution.
- Pedestrian footpaths should be well lit so people feel safe moving throughout the site.
- Avoid lighting areas that cannot be seen from the road or residents as this will attract congregating, malicious damage, crime and antisocial behaviour.
- Lighting is not obstructed by street trees as it will create dark shadows and concealment.

- Building entrances, stairwells, communal areas, and car parks should be well lit so people feel safe moving throughout the site.
- Walking from overtly bright places into dark places or from dark to light places can lessen a person's ability to see and recognise people, objects and colours. Transition lighting is important as it helps to reduce discomfort and vision impairment.
- In enclosed car park, use light coloured paint on vertical surfaces and ceilings to maximise light distribution.

11. Access Control

Natural Access Control relates to controlling access to a building or place by means of doors, locks, shrubs, fences and other physical elements to either encourage access by authorised users or keep unauthorised persons out of a particular place if they do not have a legitimate reason for being there. Access points need to be clearly defined to assist in way finding. Visual (and other) markers can be used to guide people to or away from places. Lighting, fencing, signage, textured or coloured pavers, placement of entrances and exits are physical markers commonly used to maintain access control.

Access points to places should be designed to maximise visibility for both people entering or exiting the area. Not only does this help to maintain access control but also to enhance passive surveillance

Access Control strategies restrict, channel and encourage the movement of people and vehicles throughout the site. Physical barriers increase the effort required to commit crime and help to define borders and transitions between public and private space. It is recommended that access control and physical barriers are implemented to reduce the risk of crimes such as trespassing, theft and break-ins.

Recommendations:

- It is important to consider the type of landscaping so that no person can conceal themselves behind or within vegetation or gardens.
- Uneven building alignments, inset doorways and hidden entrances are known to facilitate predatory crimes, thefts, malicious damage and other offences. Also ensure that the front entrance is not recessed to a depth that would allow a person to conceal themselves in order to reduce the risk of crime.
- To limit the potential for dangerous interactions, keep public access points separate from employee access points where necessary. Establishing a perimeter boundary for an employee parking lot creates a level of protection within the parking area so staff can move back and forth to their vehicles safely.
- Separating the ambulance delivery area from the public emergency entrance will limit confusion and ensure an intruder is not gaining access to the hospital through a vulnerable and often chaotic area. This can be as simple as creating an environment that the public will not be drawn to or is not readily visible from the front of the hospital, which can be done with additional vegetation or barriers.
- To increase the security of the hospital, consider creating a glass vestibule to act as an additional set of doors necessary to gain entry. It is also important to use glass that cannot be shattered.
- Admitting and waiting areas in emergency departments are often high-stress spaces in which tempers can flare. To protect the staff working in these areas, create safe

points and escapable options in case they feel threatened. For instance, while a desk can act as an initial boundary, having an additional exit behind the desk through which staff can slip out if threatened adds an extra layer of protection.

- After hours management measures such as consideration of adequate levels of lighting, CCTV and security patrols at key locations such as building access points, courtyards, loading bays, basements and car parks is crucial.
- Use of robust materials in finishes to minimise the impact of malicious damage.
- Use of clear signage in relation to pedestrian access, clearly marking staff only areas.
- Installation of clear and prominent signage reminding users not to leave valuables in their cars.
- Restrict access to car park areas after hours by allocating certain areas as staff only areas.
- Minimise the number of entry and exit points to multi-level car parks. Having multiple entry and exit points increases the risk of crime.
- The carpark should incorporate communication devices such as intercoms, public address systems, telephones and emergency alarms.
- Avoid potential entrapment points, for example blind corners and wide columns throughout the hospital site, including the outdoor areas and carparks.
- The pedestrian access through the undercover parking area should be clearly delineated to enhance safety and minimise conflict with vehicles.
- Design separate staff areas to be well-lit, on main street frontage, visible from within the building, with a well-lit route to car parking and public space.
- Crime risk can be reduced for staff working nights by reserving easily accessed and well-lit car spaces near guardians. The provision of a security usher staff to their vehicles is also an added security measure.
- Provide secure electronic access (card / key controlled entries / lifts etc.) to all entrances of the building to facilitate in demarcating the site's public and non-publicly accessible areas.

12. Territorial Reinforcement

Territorial Reinforcement refers to the clear distinction between public and private space. Clear boundaries between public and private areas can be achieved through the use of physical elements such as fences, pavement treatments, signage, art, signs, walkways, landscaping, lights, bollards and good maintenance. These elements can provide a degree of privacy but also informs as to the intended function of an area. Identifying unauthorised users is much easier in a well-defined space.

Recommendations:

- Provide wayfinding signage and building identification signage where appropriate to reinforce perceptions of safety and legibility in the development. Suitable wayfinding signage at the perimeter and entrance to the development is recommended for the purpose of reducing opportunities for people to find excuses to gain unauthorised access and / or to loiter in areas of the development or immediately adjacent to entries.
- Maintain the provision of a concierge / help desk within the foyer to introduce formal guardians to the area.

- Locate areas of little or infrequent use, such as loading docks, service bays or storage areas after hours, in non-critical places and prevent illegitimate access by securing/locking them.
- It is positive to see the inclusion of gravel paths to increase the risk of detection for offenders.
- Overall, the introduction of a greater number of people to the site will increase territorial reinforcement. In particular, the strategic location of the employers associated with the café and concierge desk will increase the presence of informal guardians and enhance the risk to offenders and crime effort.

13. Environmental Maintenance

Maintenance of an area helps support territoriality and defines ownership of a space. A well-maintained area suggests that the area is cared for and helps to portray an image that crime will not be accepted. It clearly shows that the owners take pride in the space. Degraded and neglected areas are more likely to be targeted by crime. Maintenance includes gardening, removal of litter, prompt removal of graffiti, attending to wear and tear. Maintenance of vegetation is also important in maintaining view lines and encouraging passive surveillance.

Maintenance of an area can collectively generate a sense of pride and community. In so doing, it can help create an attractive area to spend time and therefore activate an area. Maintenance should be considered at the planning and design stage of development, as the selection of materials and finishes will impact on the maintenance requirements and longevity of the product.

Recommendations:

- Consider the inclusion of public art to enhance the appearance of the hospital.
- It is recommended that there is limited access to the building walls through landscaping and any graffiti be removed within 48 hours to reduce notoriety.
- Rapid removal of graffiti is a highly successful long-term graffiti management strategy.
- It appears that concrete is used on Level 1 of the building. Ensure that light colours are not used on the buildings and anti-graffiti materials are maximised to reduce the opportunity for graffiti.

14. Accessibility

- The recommendations from the two BCA and DDA assessment reports from Blackett, Maguire and Goldsmith need to be addressed.
- Ensure accessible car parking spaces are provided in each of the parking zones including the Emergency Short Term Stay Parking Bay
- In addition to the Braille signage requirements recommended as per the 'Referred for Upgrade in the Sunshine Coast Hospital DDA Claim Judgement' Page 52 of 56 recommend also including QR codes as an alternate way to access the messaging.
- Provide details on the path of travel from the train station and public transport.
- Provide recharge points for mobility scooters.

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Should you have any enquiries in relation to this matter, please do not hesitate to contact the undersigned on (02) 4221 6111.

Yours sincerely

Mathew Rawson
Manager Planning and Urban Release

REQ05657/2023
New Shellharbour Hospital - SSD-57064458

Attachment 1:



Administration Centre
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Dharawal Country
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4 September 2023

The Hon. Ryan Park MP
Minister for Health
263 Princes Highway
CORRIMAL NSW 2001

Email: keira@parliament.nsw.gov.au

**Proposed new Shellharbour Public Hospital
Alternative Access to the M1 Princes Motorway**

Dear Minister Park

Shellharbour City Council previously wrote to the Hon Brad Hazzard on 13 December 2022 regarding the need for the proposed Shellharbour Hospital to have an alternate access via a grade separated interchange directly from the M1 Princes Motorway to the new hospital site.

Council has concerns about the ability for emergency services to safely access the site from the M1 Princes Motorway via Shellharbour and Dunmore Roads in a timely manner without impacting public safety and offers the following to support these concerns.

Dunmore Road currently provides access to:

- Bass Point Quarry with a significant amount of truck movements per day,
- Shellharbour Golf Course,
- Shellharbour Anglican College School with a 40kph school zone,
- Dunmore Waste and Resource Recovery Depot
- Shell Cove and Shell Heights residential areas.


As developments of this nature will generate significant traffic to and from the site, Council has concerns about the ability for emergency services to safely access the site from the M1 Princes Motorway via Dunmore Road, particularly if an incident occurred on Dunmore Road that would result in its closure for a period of time.

Council's preferred access to the new hospital is via a grade separated interchange from M1 Princes Motorway with a secondary access from Dunmore Road. This would reduce travel times and potentially save an emergency vehicle travelling an additional 2.8km, through a 40kph School Zone and residential areas to access the hospital. This will greatly assist emergency response by avoiding local streets, particularly for those emergencies to the south of Dunmore.

Council would also like to ensure the proposed hospital has adequate off-street parking for staff and visitors to the site, given its remote location away from suitable public transport options, with the Shellharbour Junction Train Station approximately 1.5 km away from the new hospital site.

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New Shellharbour Hospital - SSD-57064458

The Hon. Ryan Park MP
Proposed new Shellharbour Public Hospital – Alternative Access

Should your office have any further queries on the matter, please be in contact with Council's Director Infrastructure Services, Mr Ben Stewart, 

Yours sincerely

Michael Archer
Chief Executive Officer