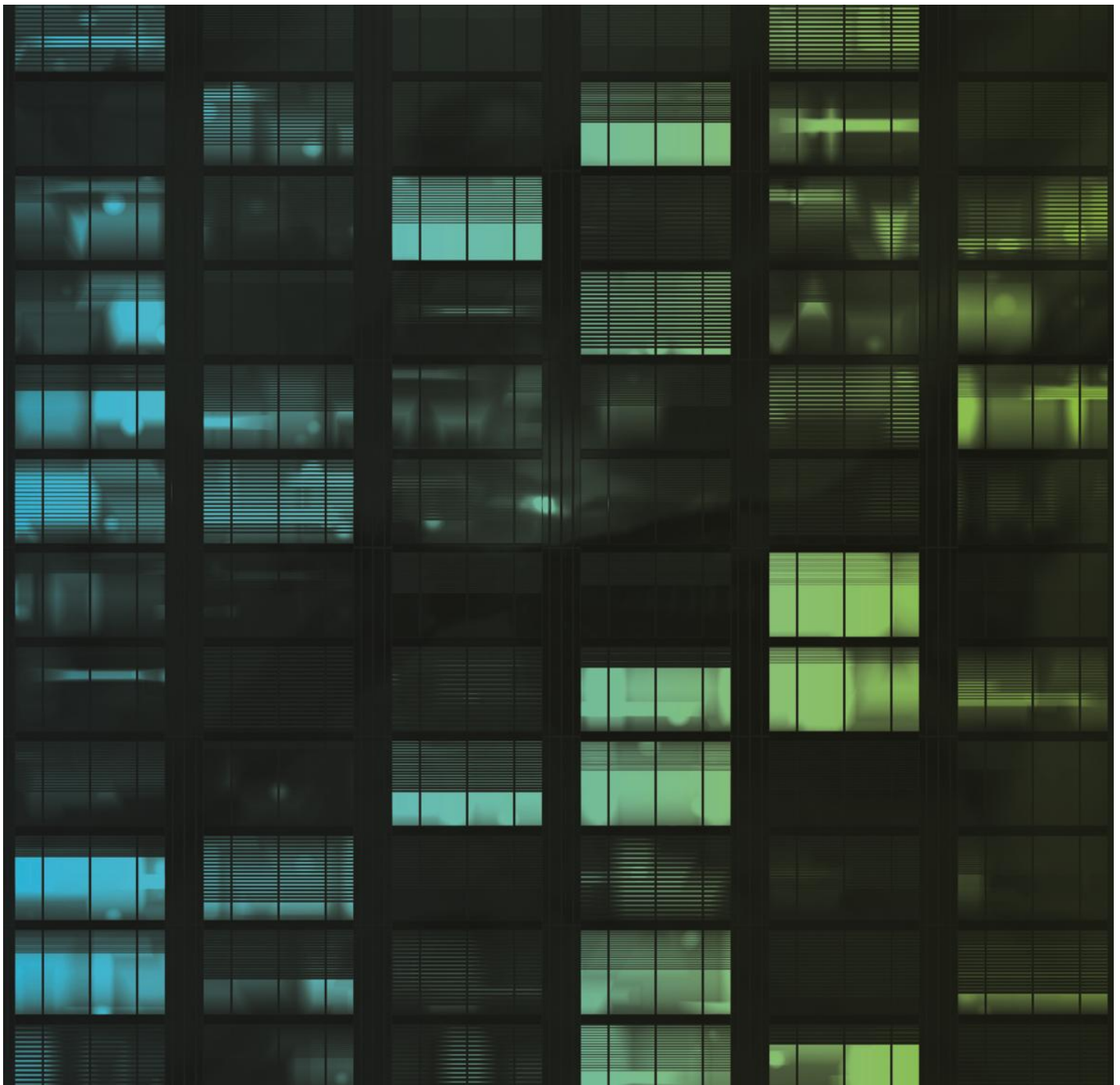


Tamworth Hospital Redevelopment SSD - 5204 Submissions Report



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Prepared for

NSW Health Infrastructure

Prepared by

AECOM Australia Pty Ltd

Level 21, 420 George Street, Sydney NSW 2000, PO Box Q410, QVB Post Office NSW 1230, Australia

T +61 2 8934 0000 F +61 2 8934 0001 www.aecom.com

ABN 20 093 846 925

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Prepared by John Riordan, Associate Director Design + Planning AECOM Australia Pty Ltd

Reviewed by Clare Findlay, Senior Planner, Design + Planning AECOM Australia Pty Ltd

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Revision	Revision Date	Details	Authorised	
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1.0 Introduction

This Report has been prepared by AECOM Australia on behalf of the Proponent, NSW Health Infrastructure. The Report provides a response to the submissions received during the public exhibition of State Significant Development Application 5204 for the proposed Tamworth Hospital Redevelopment, located at 31 Dean Street Tamworth NSW. To confirm, development approval is sought for:

- Earthworks and associated excavation for site preparation;
- Construction of a new five level Acute Services Building with an overhead link to the Brudelin Building;
- New access and transport facilities, including construction of a new hospital entry road from Dean Street and associated parking areas;
- Landscaping works; and
- Demolition of buildings within the footprint of the new Acute Services Building.

The State Significant Development Application (dated July 2012) was submitted to the NSW Department of Planning and Infrastructure and placed on public exhibition between 29 July 2012 to 27 August 2012. During the public exhibition, seven submissions were received. Five of these submissions were from government agencies, the other two from the general public.

The main issues identified by the submissions were traffic and access, stormwater management, environmental and neighbour amenity.

NSW Health Infrastructure and its project consultant team have reviewed the submissions and in accordance with Clause 85B(2) of the Environmental Planning and Assessment Regulation 2000 provide a response to the various issues raised.

This Response to Submissions Report is structured as follows:

Section 2 Response to Submissions

This section outlines the Proponents response to each individual submission from government agencies and the public.

Section 3: Mitigation Measures

Health Infrastructure's confirmation of draft Mitigation Measures.

Section 4: Conclusion

The report should be read in conjunction with the plans and documentation provided at the Appendices.



Figure 1. Illustrative image of proposal.

2.0 Report authorship

The Submissions Report has been prepared by the Planning, Design and Development Group of AECOM Australia Pty Ltd (NSW Office). John Riordan Associate Director and Urban Planner is the primary author. Technical input has been provided from:

- TTW – Civil Engineering;
- Arup – Traffic and access; and
- Donnelly Simpson Cleary – Hydraulic.

Project coordination has been provided by APP.

3.0 Response to submissions

This section responds to the issues received during the statutory exhibition period of the Environmental Impact Statement.

3.1 NSW Roads and Maritime Service (RMS)

RMS Comment	Response
RMS has no objection to the proposed development, however provided the following comments:	-
Safety and efficiency of Peel Street is a concern. Significant impact upon traffic in the surrounding local network has the potential to impact upon the operation of Peel Street.	The project will not generate significant traffic growth and hence not create additional impact on the operation of Peel Street. We note that RMS and Tamworth Regional Council have recently commissioned a traffic study to review conditions and make recommendations on the operation of Peel Street between Bligh Street and Tribe Street.
Transport accessibility and connectivity for pedestrians/cyclists should be in accordance with any Pedestrian Access Management Plan (PAMP) and/or Bike Plan held by Tamworth Regional Council.	Relevant Council plans will be consulted, however specific PAMP or Bike Plans appear not to be available.
Current on-street parking in the vicinity of the hospital is under pressure and the redevelopment should address this issue by providing sufficient on-site parking.	<p>The majority of on-street car parking occurs along roads that address the hospital, and this should be considered as valid parking for people who choose to park there.</p> <p>Additional on-site car parking is being provided to alleviate on-street car parking spread to streets further away.</p>
A central median should be provided to restrict right turn into the Main Entrance and Staff Entrance, as proposed. Vehicles should travel to the proposed roundabout, and travel around to those entrances.	<p>The proposed introduction of right turn bays on Dean Street will improve access to the key entrance roadways of the site.</p> <p>The RMS suggested alternative for a central median will impact on access, forcing all drivers to travel north along the full 400m length of Dean Street and use the roundabout to turn around and travel back south along Dean Street to turn left into each driveway. This will cause confusion for drivers and add extra travel.</p> <p>Dean Street only serves the hospital and the prison and it is therefore valid to locate entrances along this section of the road. From observation, there are low volumes of traffic and vehicles travel at appropriate speeds.</p>
Access points around Dean Street and Johnston Street should be rationalised.	The use of the southern driveways on Dean Street will reduce once the public car parking is moved into the central car park. Redundant driveways will be removed.
The north-west access point to the Koolkuna Building (directly opposite the main access) could be closed and relocated to form a western stub of the proposed new	This car park provides 11 spaces for staff and 12 spaces for visitors. With this low number of spaces, car turnover is low. There is no proposal to change the

RMS Comment	Response
roundabout.	existing site access driveway. Relocating it as part of the roundabout would add a fifth leg, which would be confusing for drivers.
Ambulance access may be more direct via the private vehicle, with a boom gate at the internal cul-de-sac end rather than the internal ring road.	<p>The site access principle is for the public to enter from Dean Street, and hospital vehicles (including the ambulance) to enter from Smith Street. There is still flexibility for ambulances to travel around the proposed internal ring road in both directions, and this will be necessary when the eastern area of the ring road is closed during operation of the helipad.</p> <p>It is noted that access has been developed in consultation with the NSW Ambulance Service.</p>
Buses and Service vehicles should be able to enter and leave in a forward direction.	All bus and service bay areas will be designed for entry and exit in a forward direction.
Construction Management Plan should give consideration to the requirement of the Roads and Maritime Service document ' <i>Traffic Control at Worksites</i> '.	Noted. Mitigation measures have been revised to reference this RMS document.
RMS and Tamworth Council are undertaking a Traffic Study on a section of Peel Street, including Peel Street/Jewry Street intersection which provides primary connection to Dean Street and forms a key route to the site. A focus of the study is to identify future works at improving the safety and efficiency of this intersection and connections to the local traffic network. Any increased attraction to the hospital would have the potential to impact upon the safety and efficiency of this intersection and Peel Street in general.	<p>NSW Health Infrastructure welcomes the undertaking of this study and looks forward to the findings.</p> <p>However, planning approval should not be held up for the project until this study is complete.</p>

3.2 Tamworth Regional Council

Tamworth Council Comment	Response
Council provides no objection to the proposal, subject to the following comments being addressed:	
<p>Stormwater</p> <p>The Creek west of the site has no capacity. Drainage infrastructure in Dean Street and Johnston Street can accommodate only minor flows from the development. On site detention should be supplied to control the discharge to 0.6m³/s for events up to and including the 1 in 10 year ARI event. Recommended conditions of consent are provided for stormwater below:</p>	<p>A Plan for Catchment 2 is attached at Appendix A.</p> <p>The current runoff rate in the 10 year event is 1.531m³/s. The request for improvements over the existing condition is not warranted as Catchment 2 is not significantly impacted by the proposal.</p>
<p><i>Recommended condition of consent: catchment 1:</i></p> <p>All stormwater flows off roof areas within catchment 1 shall be plumbed and piped in accordance with AS3500 to the concrete channel on the southern side of Johnston Street between Smith Street and Bligh Street. All stormwater flows of hardstand areas for peak flow events up to and including the 1 in 10 year ARI event shall be piped to the concrete channel on the</p>	<p>Agreed and reflected by the current proposal.</p> <p>Mitigation measures revised to confirm acceptance of this condition of consent.</p>

Tamworth Council Comment	Response
southern side of Johnston Street between Smith Street and Bligh Street.	
<p><i>Recommended condition of consent: catchment 2:</i> All stormwater flows off roof areas within catchment 2 shall be plumbed and piped in accordance with AS3500 to Councils existing stormwater infrastructure at the north eastern corner of the Dean Street and Johnston Street intersection.</p> <p>All stormwater flows to hardstand areas for peak flow event up to and including the 1 in 10 year ARI event shall be piped to Councils existing stormwater infrastructure at the north-eastern corner of the Dean and Johnston Street intersection. Onsite detention systems shall be provided such that the discharge for the peak flow in the 1 in 10 year ARI event does not exceed 0.6m/3.</p>	<p>This condition is not agreed to.</p> <p>An updated Catchment Plan is provided at Appendix A. Catchment 2a and 2b have been reduced with parts of these catchments redirected to the south east corner. Catchment 2c has also been reduced marginally. These amendments will result in a significant improvement to the current run off condition. It is noted that these amendments have been discussed with Council.</p> <p>The detention storage required to reduce catchment 2 runoff to 0.6cu.m/s is 470cu.m would require additional pipe work on the western site boundary parallel to that in Dean St, which is unnecessary based on the above.</p>
<p><i>Recommended condition of consent: catchment 3:</i></p> <p>Onsite stormwater detention systems to control developed flows to natural flows across the range 1 in 1 year ARI to 1 in 100 year ARI events for all roof and hardstand areas shall be provided.</p>	<p>This condition is not agreed to.</p> <p>Detention for catchment 3 has been designed to limit proposed run off beyond the existing condition.</p> <p>To reduce flows from catchment 3 to natural (predevelopment) flows from the 2 year to 100 year ARI events, 1100cu.m storage would be required which is considered unnecessary based on the above.</p>
<p>Water The alterations to water servicing connections proposed by the development application are acceptable to Council.</p>	Noted.
<p>Sewer The connection of sanitary plumbing and drainage from the Acute Services Building to the 150mm Council sewer main located in Smith Street is reliant on confirmation that there is capacity of this main.</p>	Council have since confirmed, following further modelling, that the main located (which is actually located in Johnston Street) has capacity to accommodate the flow from the proposed Acute Services Building.
<p>Transport and Accessibility Concern of Council that on-site parking will be consumed mainly by staff and that public transport travel to and from the site will not increase.</p>	The central car park will provide 191 spaces and be designated for public use by visitors and patients. It will be time restricted and enforced under the hospitals declared status. Additional patient parking is located in a number of locations around the site adjacent to the specialist units.
Early staff may park close to the main entrance, with visitors left to park in outer parking areas through the remainder of the day. Staff should park in the outer parking areas.	Designated areas will be provided for visitor, patients, and staff.
A Parking Management Plan should be developed to allocate areas dedicated only for visitors and also pay parking system across the entire campus.	<p>A Parking Management plan will be prepared by the hospital. The central car park will include a pay parking system with time restriction similar to that currently in place in the southern visitor car park. The mitigation measures have been revised to develop this.</p> <p>All staff car parks are designed to be able to accommodate the installation of access control</p>

Tamworth Council Comment	Response
	measures (boom gates), should this be required in the future.
Clarification of the provision of the northwest informal parking area is required. This is included in the provision of 1081 spaces on the site however is noted as future expansion in the ARUP report. The delivery of this carpark should be a condition of approval of the DA.	The northwest informal car park currently has 33 spaces which have been counted as part of the total provision. Future expansion of this area has not been included, however could deliver a further 40 spaces if the land becomes available. This expansion has not been relied upon and does not form part of the SSD.
Council supports discussions by the proponent to redirect bus access into the hospital, compared to current requirement of working their way around the campus.	The bus route already traverses the hospital and would be relocated onto the new section of the proposed ring road. Bus stops will be provided for bus passengers. Discussions have been held with Tamworth Buslines regarding reversal of the bus route around the site. This would allow bus stops to be located on the inside of the ring road and would require construction of a bus stop on Johnston Street, opposite the Tamwell Centre.
A bus route and stops (with shelters) should be a condition of consent, including a stop on Johnston Street opposite the Tamwell Centre.	The mitigation measures require that Health Infrastructure will finalise the final bus route and location of bus stops with the local bus provider.
Council support in principal proposed works along Dean Street for right hand turn lanes at the Staff Entrance and main Street Entrance as well the provision of the roundabout. A condition of consent is that the final design details for such modifications are referred to the Tamworth Local Traffic Committee for review prior to construction certificate.	The mitigation measures have been revised to require that Health Infrastructure will brief the Tamworth Council Local Traffic Committee on the final design of site access works from Dean Street.
A signage plan should be developed for the installation of directional signage for 'P' Parking areas.	A signage scheme will incorporate directions to parking areas, the main entrance and to Emergency as shown in Figure 16 of the Transport and Accessibility Assessment. The mitigation measures have been revised to provide for this.

3.3 Department of Primary Industries

Department of Primary Industry Comment	Response
It is unlikely that groundwater will be intercepted during construction date due to the depth of the water table. However, if groundwater is intercepted then a licence for temporary dewatering would be required under Part 5 of the Water Act 1912.	Noted.
Stormwater management techniques should be employed to ensure stormwater is treated to an appropriate standard on-site prior to discharge.	Erosion control plans for the project incorporate management techniques to ensure stormwater is treated prior to discharged. Oil and sediment filters will be provided under the detail design documentation.
Any stormwater detention basins must be constructed above the groundwater table or sealed with	Noted. Mitigation measures revised to provide for this.

Department of Primary Industry Comment	Response
impermeable liners to prevent direct connection with groundwater.	
Works on Crown lands would need to be assessed under the Crown Lands Act 1989. A lease will need to be issued under that Act prior to any occupation on that land.	Noted. Will be administrated by Health Infrastructure separately.

3.4 Office of Environment and Heritage

Office of Environment and Heritage Comment	Response
The Office of Environment and Heritage have no specific comments on the proposal.	Noted.

3.5 Environment and Protection Authority

Environment and Protection Authority Comment	Response
The Environment Protection Authority notes that no works are scheduled and or require approval under Acts administrated by the EPA.	Noted.
NSW Health is encourage to manage environmental issues under current environmental guidelines and best practice.	Noted and mitigation measures have been revised to reflect this.

3.6 Submission received from Mr Mauricio Bruno

Mr Bruno Comment	Response
The Environmental Acoustic Assessment notes there is no need to address acoustic issues associated with the Helicopter as this should have been addressed earlier under separate planning applications.	The Acoustic Assessment relates only to the project, being a new Acute Services Building. The project does not alter the location of the Helipad and therefore helicopter take off/landing approaches do not warrant reassessment.
Helicopter impacts should be addressed as part of this project due to the new facilities creating increases to the frequency of flights. Specifically, there should be consideration on the impact to adjacent residential homes.	The Acute Services Building directly replaces existing building facilities on the site. Accordingly, significant increase in patient numbers is not expected and the frequency of helicopter flights will generally remain the same.
Helicopter flight paths should be over vacant Crown Land and or a safer height above homes.	There is an accepted helicopter landing and take-off procedure for the site. As noted, the planning for the Helipad is not a part of this project as it is to remain at its current location. Helicopter flight paths would have been considered during previous studies on the location of the Helipad.

3.7 Submission received from Mr Barry Maher

Mr Maher Comment	Response
The Hospital Redevelopment is supported, however there has been a lack of communication and disregard for residents in the area.	Noted.
Present concerns include: entry/exit point for heavy vehicles delivery materials and products; point of entry for works; traffic speed at the work site and surrounds; continual noise outside normal hours of work; lack of access and parking at 139 Johnston Street; poor performance, lack of communication and consideration of contractors for gas and power upgrade/extension works at 139 Johnston Street; Property damage to 139 Johnson Street; Uncompleted footpath work affecting access to 139 Johnson Street.	<p>A construction traffic management plan will be prepared for all stages of development of the hospital. Completion of the internal ring road as part on the other works on the site will enable all construction traffic activity to be focused on the eastern side of the campus. Public and staff access will be retained and focused on the western side of the campus from Dean Street.</p> <p>With respect to comments related to 139 Johnston St, these are considered to relate to the Cancer Care Centre project which is not affected by this application. However, representatives of the Hunter New England Area Health Service have communicated with Mr Maher to address concerns related to construction impacts of the Cancer Care Centre.</p>
In response to the above concerns, the following is demanded: Traffic control and temporary and temporary speed zoning be put in place; present site access closed and shifted to the internal road opposite to the Pathology Services Building entry/exit point; Work vehicles to park on site and not on Johnston Street; Removal of the No Parking area from the front of 139 Johnston Street; damage to fencing at 139 Macquarie Street fixed; complete footpath outside 139 Macquarie Street.	Refer to response above.
<p>In general, traffic within the area has increased and parking has become a problem. Staff appear to take up spaces on surrounding streets on weekdays. The following is requested to improve parking and access in the area:</p> <p>Entry to hospital services to be taken from the proposed internal access ring road, with the current entry closed to the area of the Pathology building. Roundabouts placed on Dean and Smith Street intersections; parking along the southern side of Johnston Street, from the eastern boundary of Tamwell to the Smith Street Intersection, for local traffic only; pedestrian pathways extended from the Piper Street/Bligh Street intersection along Piper Street to Smith Street, then along Johnston Street and continue through the site along the internal access ring road - this would support a Shared Pathway announced by Tamworth Regional Council which is to run from Peel Street, north along Jewry and Dean Streets and connect to the hospital; Traffic calming devices be placed in Johnston Street.</p>	<p>The EIS seeks planning approval for the modification of onsite parking, providing 162 spaces. On completion of the project, and with other separate site access and parking works, the final increase in parking will be 137 spaces above the existing. Including the parking available along hospital frontage streets of Dean and Johnston Streets, parking will address anticipated demand. There will always be some overflow onto other streets from visitors choosing not to access the campus car parking. However, the hospital cannot control visitors who decide not to park on the campus.</p> <p>There will be a ring road with public access focused from Dean Street, with the loading dock, staff car parking and ambulance access from Smith Street.</p> <p>Bus access will continue through the site via the internal ring road, with a proposal to reverse the direction of travel.</p> <p>The proposal will not generate significant increases in traffic, accordingly further traffic calming devices are not warranted along Johnston Street.</p>

4.0 Mitigation Measures

Following receipt of the submissions, and review and response, the mitigation measures provided with the Environmental Impact Statement have been revised to include some additional measures. These relate to reference to '*Traffic Control at Worksites*' for the Construction Management Plan and a Parking Management Plan. The Temporary Accommodation has been deleted as Health Infrastructure will undertake this separately and is not affected by this SSDA.

Confirmation of Mitigation Measures is provided below.

4.1 Demolition management plan

Demolition will be undertaken in accordance with the requirements of the relevant Australian Standard AS2601-2001. The demolition of structures is to be incorporated into the Occupational Health and Safety Act 2000 administered by Work Cover NSW.

A Hazardous Materials Management Plan will be prepared prior to demolition commencing.

The proponent commits to preparing a demolition management plan prior to the commencement of any demolition works on site. The demolition is to include measures to manage the following potential impacts:

- Demolition vehicle movements;
- Dust;
- Noise;
- Demolition waste including hazardous wastes;
- Site erosion and sediment control in accordance with "Managing Urban Stormwater (EPA, NSW) and Soil and Erosion Control (The Institution of Engineers Australia).

4.2 Construction management plan

The proponent commits to preparing a construction management plan prior to the commencement of any construction works on site. The plan will include:

- Construction hours;
- Air Quality/dust control procedures;
- Noise Management procedures;
- Waste Management Plan (including hazardous wastes, refer section ;
- Community safety plan;
- Storage and handling of materials;
- Environmental training and awareness;
- Contact and complaints handling procedures;
- Emergency preparedness and response;
- Location for disposal of fill; and
- Construction Traffic Management Plan including, but not limited to:
 - Construction vehicle movements and construction staff parking;
 - Arrangements for temporary pedestrian, bicycle, and vehicle access.

The preparation of the Construction Traffic Management Plan will take into consideration the Roads and Maritime Service document '*Traffic Control at Worksites*'.

4.3 Construction noise and vibration management plan

A Construction Noise and Vibration Management Plan (CNVMP) shall be prepared prior to the commencement of any construction works on site which will:

- Assess the likely noise and vibration emissions from construction activities occurring on site; and
- Recommend mitigation measures in order to comply with construction noise and vibration criteria.

4.4 Noise mitigation measures

Details of proposed noise mitigation measures for building services plant for environmental noise to be confirmed prior to issue of the Construction Certificate. The proposed noise mitigation measures are to be determined having regard to the Acoustic Assessment dated 4 June 2012.

4.5 Catchment 1 stormwater management

All stormwater flows from roof areas within catchment 1 shall be plumbed and piped in accordance with AS3500 to the concrete channel on the southern side of Johnston Street between Smith Street and Bligh Street. All stormwater flows of hardstand areas for peak flow events up to and including the 1 in 10 year ARI event shall be piped to the concrete channel on the southern side of Johnston Street between Smith Street and Bligh Street.

4.6 Stormwater detention basins

Any stormwater detention basins will be constructed above the groundwater table or sealed with impermeable liners to prevent direct connection groundwater.

4.7 Aboriginal cultural heritage

The proponent commits to ceasing all work immediately if any Aboriginal archaeological relics are uncovered in the area where the relic is found. The proponent will contact the National Parks and Wildlife Service (NPWS) and comply with any requirements of the NPWS to cease work for the purpose of archaeological recording.

4.8 European cultural heritage

If any relics are uncovered during the course of the work, then all work shall cease immediately in that area and the NSW Heritage Office shall be contacted. Depending on the possible significance of the relics, an archaeological assessment and excavation permit under the NSW Heritage Act 1977 may be required before further works can continue in that area. The proponent shall comply with any requirement made by the NSW Heritage Office to cease work for the purpose of archaeological recording.

The location of significant trees to be transplanted is to be determined in consultation with the Council.

4.9 Hazardous materials

The proponent commits to update the table in Appendix 7.3 of the "Tamworth Hospital Disaster Plan" (dated 2008) to ensure that it reflects the new arrangements resulting from the hospital redevelopment in relation to mitigation of potential hazards within the hospital site.

4.10 Waste management guidelines

The proponent commits to review and update the Tamworth Hospital Waste Management Guidelines dated June 2004 to reflect the new facilities and layout of the hospital prior to Occupation.

4.11 Wayfinding and signage

A signage strategy is to be developed and implemented for the Hospital prior to Occupation. This includes 'P' Parking directional signage to be located on Dean Street.

4.12 Parking management plan

The proponent commits to the preparation and implementation of a Parking Management Plan prior to operation of the Acute Services Building. The Parking Management Plan shall address arrangements for timed user pay, access control systems and staff education.

4.13 Site environmental assessment

The Proponent commits to undertake a Phase 2 Soil Contamination Assessment across the site following the demolition of the existing structures and prior to the commencement of construction of the new buildings. With reference to the Phase 1 Contamination Assessment dated April 2012, the Phase 2 Soil Contamination Assessment is to include installation of groundwater and gas monitoring bores in the landfill, together with a gas monitoring bore between the landfill and the proposed basement excavation of the new Acute Services building.

4.14 Management of site environmental issues

The proponent commits to manage site environmental issues in accordance with best practice guidelines.

4.15 BCA and building regulations

Prior to issue of a Crown Certificate, it will be demonstrated that the proposed development will achieve compliance with the performance provisions of the BCA in respect of:

- Exit travel distances;
- Compartment size;
- Smoke hazard management;
- Building access;
- Paths of travel;
- Protection of openings.

4.16 Bus route and bus stop locations

The proponent commits to finalising bus route and bus stop locations in consultation with local bus operator and Tamworth City Council.

4.17 New Hospital entry road

The urban design treatment of the shared zone at the new main entry drop off and pick up area will be determined in consultation with user groups and Tamworth Regional Council.

4.18 Access works along Dean Street

The proponent commits to brief the Tamworth Local Traffic Committee on the detail of vehicle site access works proposed along Dean Street.

4.19 Green Travel Plan

The Proponent commits to preparing a Green Travel Plan for Tamworth Hospital.

4.20 Ecologically Sustainable Development

The Proponent commits to target a 4 star Green Star rating for the Acute Services building, however will not be formally certified against this rating tool.

4.21 Crime prevention and public safety

Car parks and external areas will be lit to appropriate Australian Standards for crime prevention and public safety.

Plantings in the car park areas will be consistent with crime prevention and public safety principles.

4.22 Temporary accommodation

The Proponent commits to determining the location of temporary accommodation in consultation with user groups.

4.23 Geotechnical and structural engineering

The Proponent commits to carrying out inspections during excavation and construction to confirm that foundation materials agree with the recommendations of the Geotechnical Report at **Appendix J** of the Environmental Impact Statement.

4.24 Bushfire safety

The proponent commits to complying with the bushfire mitigation measures set out in the Bushfire Report at **Appendix F** of the Environmental Impact Statement.

5.0 Conclusion

This Submission Report consolidates NSW Health Infrastructure response to comments raised from the recent public exhibition of the Tamworth Hospital Redevelopment SSD 5204.

During the public exhibition, 7 submissions were received. Five of these submissions were from government agencies and the other two from the public. The main issues identified by the submissions are traffic, access, parking, stormwater management, environmental and neighbour amenity. The Submissions Report has provided a response to the key issues raised. Some minor adjustments to the Mitigation Measures have been undertaken to deal with comments, however adjustments to the design are required in response to the public comments.

It is recommended that the Department of Planning and Infrastructure approve SSD 5204, subject to the Mitigation Measures contained within this document.

Appendix A

Catchment Plans

