



**STATE SIGNIFICANT DEVELOPMENT  
ASSESSMENT REPORT:**

***Bega Valley Health Services  
Redevelopment: Staged Development  
Application- Concept Proposal and Stage  
1 development application (construction  
enabling works), 1614 Tathra Road, Bega  
(SSD 5307\_2012)***



Director-General's  
Environmental Assessment Report  
Section 89H of the  
*Environmental Planning and Assessment Act 1979*

March 2013



## ABBREVIATIONS

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Applicant	Health Infrastructure
CIV	Capital Investment Value
Department	Department of Planning and Infrastructure
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning and Infrastructure, or his delegate.
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
LEP	Local Environmental Plan
Minister	Minister for Planning and Infrastructure
PAC	Planning Assessment Commission
Regulation	Environmental Planning and Assessment Regulation 2000
RtS	Response to Submissions
SEPP 2011	State Environmental Planning Policy (State and Regional Development) 2011
SEPP	State Environmental Planning Policy
SEE	Statement of Environmental Effects
SSD	State Significant Development

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Cover Photograph: Rendered 3D Aerial View prepared by BVN

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## 1. PROPOSED PROJECT & SITE DESCRIPTION

### 1.1 The Proposal

Health Infrastructure NSW has lodged a staged development application which sets out the concept proposal for a new integrated health services facility and stage 1 construction works for Bega Valley Health Services at 1614 Tathra Road, Bega. The site is legally described as Lot 1 in DP1176012 and is located approximately 2km south-east of the Bega Town Centre.

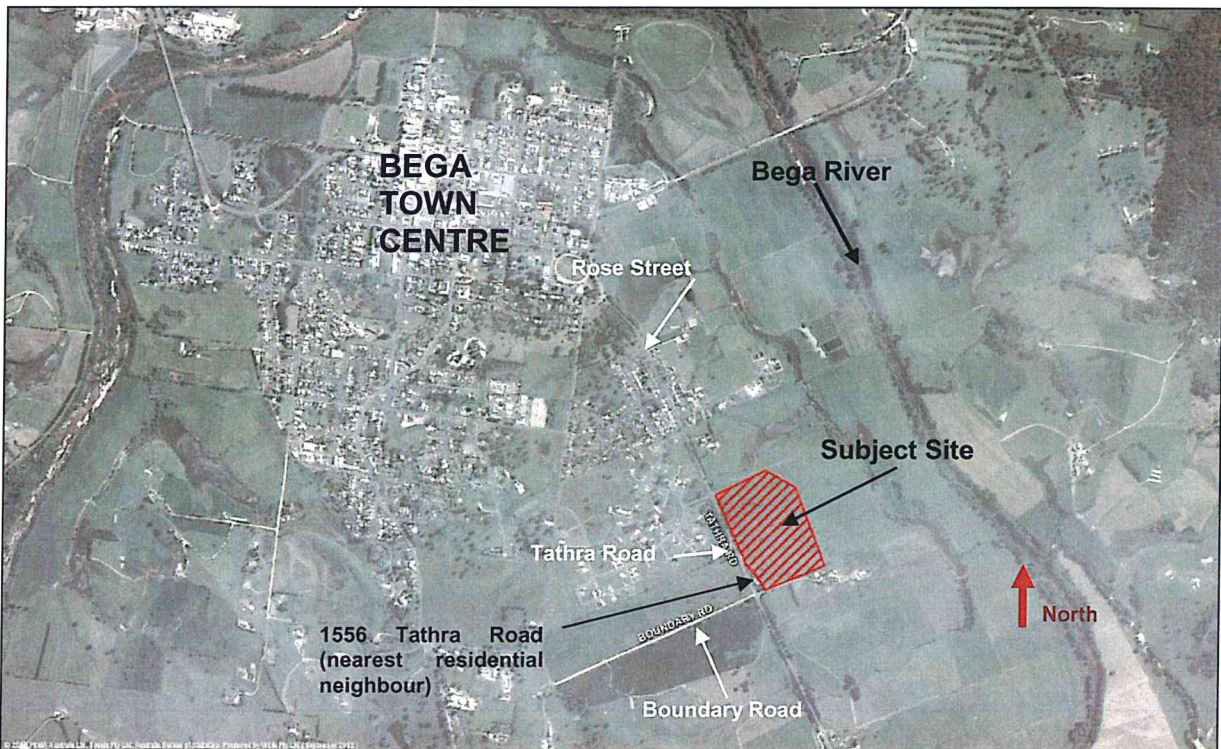
Health infrastructure NSW has advised that the current services for the region, which comprise the Bega Hospital, Pambula Hospital and a number of community health services are outdated and are no longer suited to the provision of contemporary health care. Accordingly, the existing health services available to the Bega Valley and the broader region are no longer aligned with the Commonwealth and State Health and Hospital Reform agenda. The planned future of both Bega Hospital and Pambula Hospital is unknown.

The proposal for the Bega Valley Hospital Services Development is a contemporary health care facility. It is proposed to respond to the growing community needs for a higher scope of clinical care and a broader range of acute and sub-acute health services to better meet the current and future needs of the community.

### 1.2 Site Description

The subject land is predominantly agricultural in nature and is currently used as grazing land (diary cattle). Tathra Road and Boundary Road form the western and southern boundaries of the site, respectively. The nearest dwelling house is located at 1556 Tathra Road, directly to the south-west of the site. Bega River is located approximately 400 metres to the east of the site.

The project location is shown in **Figure 1** below including the site's relativity to the Bega Town Centre. The site is located in the Bega Valley Local Government Area.



**Figure 1: Project Location**

The site is located at an elevation of between 10m and 36m above the Australian Height Datum (AHD). The highest section of the site, near the central western site boundary (adjacent to Tathra Road), is approximately 36m AHD. The site generally slopes to the east, with localised sloping to the south and the north-east.

There is a shallow ground water aquifer in the general area at depths of 5.6 to 8.2 metres below ground level, which flows in an easterly direction towards the Bega River.

There is very little remnant vegetation on the site and it is largely confined to scattered paddock trees (typically, Forest Red Gum *Eucalyptus tereticornis* and Rough-barked Apple *Angophora floribunda*). A number of these trees are hollow bearing (approximately 36) providing potential nesting and roosting habitat. The site is generally covered in grass with scattered areas of granodiorite outcrops and boulders.

Current access to the site is via a farm track off Tathra Road, which is located adjacent to the site's northern boundary.

### 1.3 Site History

Prior to 1896, the use of the land is unknown. However, since this time the site has been used predominantly for agricultural purposes including cattle grazing.

The history of these site uses has meant that the landscape is largely unmodified with the exception of a number of silage pits, concrete troughs and water tanks scattered around the site.

The site was acquired by Health Infrastructure NSW in 2010 and was earmarked for the hospital redevelopment. Prior to this time, the site was owned by Applegum Investments Pty Ltd and used as grazing land.

### 1.4 Surrounding land uses

The site is surrounded by predominantly rural land uses (grazing) to the north, east and south. Such lands include detached dwellings and outbuildings which are likely to be used in association with the agricultural uses, including dairy farming.

As detailed above, an irregular shaped lot (1556 Tathra Road) adjoins part of the south-western boundary of the site and has direct frontage to Tathra Road. The property contains a dwelling house and a number of outbuildings. It is located on a high section of land and has an outlook over the hospital site and further beyond to the east through a dense and mature corps of trees which are located on the western boundary of the hospital site.

Land on the western side of Tathra Road has been subdivided for residential purposes and is currently under development.

The proximity of the surrounding land uses to the site can be seen in the aerial photograph at **Figure 1** above.

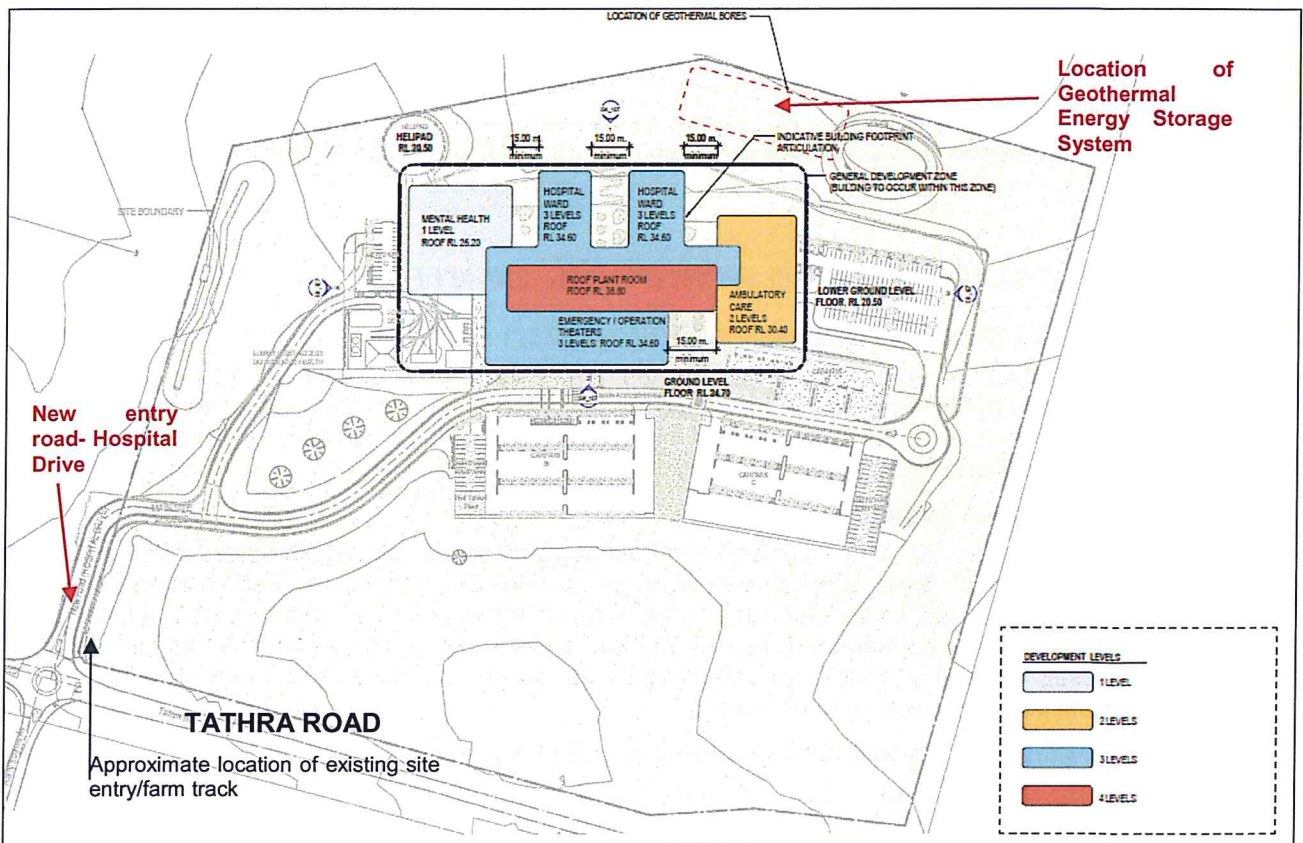
### 1.5 Key Project Components and Features

**Table 1** provides a summary of the development proposal's key components and features, as amended by the proponent's Response to Submissions. The proposed project layout is illustrated in **Figure 2** below.

**Table 1: Key Components**

<b>Project Summary and features</b>	
<b>Staged Development Application</b>	
<b>The Concept Proposal</b>	<ul style="list-style-type: none"> <li>• A new hospital facility including:                             <ul style="list-style-type: none"> <li>▪ a building envelope for a three (3) storey hospital building of approximately 26,000sqm containing 136 beds;</li> <li>▪ the building envelope has a maximum height of 3 storeys (RL 34.60) with a roof plant zone above (RL 38.80). The building footprint (excluding car parking) is contained within an area of approximately 90m x 180m. The detailed design will be the subject of a future Stage 2 development application;</li> <li>▪ the new facility is proposed to support acute and sub acute, primary health care, community and ambulatory care services, and clinical support services;</li> <li>▪ building services and associated works including a Geothermal Energy Storage System;</li> <li>▪ new access road and associated car parking;</li> <li>▪ a helipad; and</li> <li>▪ earthworks, civil infrastructure and landscaping.</li> </ul> </li> </ul>
<b>Landscaping</b>	<ul style="list-style-type: none"> <li>• Site-wide landscape works, including new soft landscaping, paving and furniture are illustrated in the landscape concept.</li> </ul>
<b>Stage 1 Construction Enabling Works</b>	
<b>Stage 1 construction enabling works</b>	<ul style="list-style-type: none"> <li>▪ bulk earthworks;</li> <li>▪ piling and foundations;</li> <li>▪ services location and reticulation;</li> <li>▪ a helipad (site works only);</li> <li>▪ new access road and associated car parking; and</li> </ul>

	<ul style="list-style-type: none"> <li>other civil infrastructure and associated works.</li> </ul>
<b>New Access off Tathra Road</b>	<ul style="list-style-type: none"> <li>Construction of a roundabout at the intersection of Harry Scanes Avenue and Tathra Road is proposed to facilitate access to the site. Works include road widening and minor localise alignment adjustments.</li> <li>Construction of a new access road (referred to as Hospital Drive) running along the northern boundary of the site from Tathra Road. Hospital Drive is proposed to be constructed on public land and will operate as a 'public' road.</li> <li>The existing entry/access track off Tathra Road will be closed and landscaped.</li> </ul>
<b>Landscaping</b>	<ul style="list-style-type: none"> <li>Installation of nesting boxes to compensate for the loss of 16 hollow bearing trees and associated landscaping.</li> </ul>
<b>Car Parking</b>	<ul style="list-style-type: none"> <li>Construction of 485 car parking spaces on the site and temporary parking for construction purposes.</li> </ul>
<b>Future Stage 2 application</b>	
	<ul style="list-style-type: none"> <li>Construction of a 3 storey hospital building of approximately 26,000sqm and associated building services.</li> <li>The Geothermal Energy Storage System.</li> <li>A helipad.</li> <li>Landscaping and associated site works.</li> </ul>
<b>Value [CIV] / Jobs</b>	<ul style="list-style-type: none"> <li>\$151,684,000 capital investment value comprising:                             <ul style="list-style-type: none"> <li>Stage 1 Construction Enabling Works: \$8,962,000</li> <li>Stage 2 Main Works: \$142,722,000</li> </ul> </li> <li>Creation of 627 (full-time equivalent) operational jobs.</li> </ul>



**Figure 2: Proposed Layout/Concept Proposal (as submitted with the Proponent's Response to Submissions)**

As detailed above, the project includes a concept proposal and the staged construction of the hospital and associated infrastructure. The extent of the works comprising Stage 1 (construction enabling works) and the future Stage 2 (building works) are illustrated in **Figure 3** below.

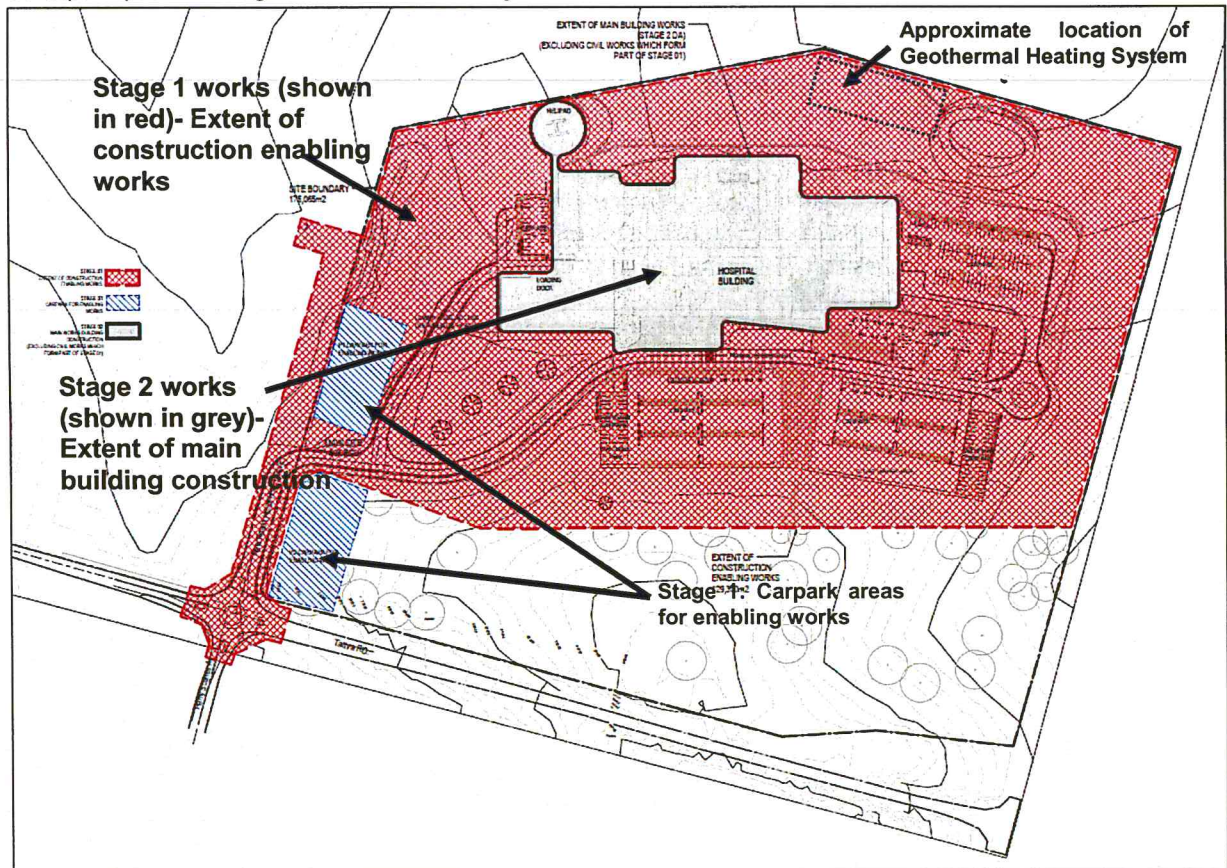


Figure 3: Proposed Project Stages (as submitted with the Proponent's Response to Submissions)

## 2. STATUTORY AND STRATEGIC CONTEXT

### 2.1 SEPP (State and Regional Development) 2011

The proposal is State significant development pursuant to clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 because it is development for the purpose of a hospital with a capital investment value (CIV) in excess of \$30 million. Therefore, the Minister for Planning and Infrastructure is the consent authority.

### 2.2 Approval Authority

On 27 February 2013, the Minister for Planning and Infrastructure delegated responsibility for the determination of State significant development under Division 4.1 of Part 4 of the *Environmental Planning and Assessment Act 1979* to the Executive Director, Development Assessment Systems & Approvals. The proposal complies with the terms of the delegation as council has not objected to the proposal, a political disclosure statement has not been made and there were fewer than 25 submissions in the nature of objections.

### 2.3 Permissibility and Zoning under Local Environmental Plan

The site is zoned 1(a) – *Rural General* under Bega Valley Local Environmental Plan 2002 (BVLEP). The proposed development is permissible with consent.

There are a number of development standards and related provisions in BVLEP which apply to the site, including general principles for the development and use of land and buildings, development along arterial roads, land filling and excavation, ESD, flood liable land and building height. These development standards and related provisions are considered in **Table 1** at **Appendix B**, and where relevant, are discussed in section 4.0 of this report.

The department is satisfied that the proposal is generally consistent with the relevant provisions of BVLEP. Clause 85 of BVLEP restricts the building height on the subject land to 3 storeys and 10 metres. The staged development application includes a concept proposal for the development of the site which includes a building envelope to accommodate a three (3) storey building and a separate

rooftop plant level. The roof top plant level is not technically calculated as a storey and therefore is not included in the overall calculation of building height.

The building envelope proposes a height 14.1 metres when measured from the established lower ground floor level of RL 20.50m AHD to the roof of Level 3 at RL34.60m AHD and therefore exceeds the height limit by 4.1 metres. The proponent has lodged a SEPP No.1 Objection to vary the height standard. The proponent has stated that the departure from the development standard is reasonable and justified for the following reasons:

*"Despite the non-compliances with the height control, the proposal still achieves the objectives of the zones. The additional building height will not result in any amenity impacts to the surrounding locality as the proposed hospital is appropriately setback from the property boundary."*

Having considered the SEPP No.1 objection, the department is satisfied that the impact of the additional building height is appropriately mitigated by the proposed re-profiling of the site and the existing topography of the land which minimises the visual impact of the development when viewed from Tathra Road. Furthermore, the department is satisfied that the general concept for the hospital is well designed and that it will not result in any adverse environmental impacts. Council has also not raised any concerns about the proposed height. Accordingly, the departure from the building height standard is supported in this instance. Matters relating to the building form and height of the concept proposal are given further consideration in **section 4.2.1**.

Draft Bega Valley LEP 2012 (DBVLEP) has been prepared by Council and is currently with the department for final review and minor redrafting. Its gazettal is imminent and rezones the site to *SP2-infrastructure*. The Land Zoning Map nominates the 'new Bega Hospital' as development being permitted on the land with consent. There is no height limit specified for the site on the Height of Buildings Map. The proposal has been assessed as being generally consistent with the provisions of the DBVLEP. Consideration of the relevant provisions in DBVLEP is provided at **Table 2** in **Appendix B**.

#### **2.4 Environmental Planning Instruments (EPIs)**

The department's consideration of relevant EPIs (including SEPPs) is provided in **Appendix B**. The proposal is generally consistent with the relevant requirements of the EPIs.

#### **2.5 Objects of the EP&A Act**

Decisions made under the EP&A Act must have regard to the objects of the EP&A Act, as set out in section 5 of the EP&A Act. The department considers that the proposal is consistent with the objects of the EP&A Act for the following reasons:

- it will provide social and economic benefits to the community through the provision of additional health services;
- it represents the orderly and economic use of public land;
- it provides essential public services and infrastructure; and
- it is proposed to be constructed in an ecologically sustainable manner.

#### **2.6 Ecologically Sustainable Development**

The EP&A Act adopts the definition of Ecologically Sustainable Development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes.

The department has considered the project in relation to the ESD principles. The Precautionary and Inter-generational Equity Principles have been applied in the decision making process via a thorough and rigorous assessment of the environmental impacts of the project.

The proposal is considered to be consistent with ESD principles as described in section 9.2 of the applicant's EIS, which has been prepared in accordance with the requirements of Schedule 2 of the Regulation.

## 2.8 Environmental Planning and Assessment Regulation 2000

Subject to any other references to compliance with the Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with. The submissions received as a result of notification are detailed in **section 3.0**.

## 2.9 Strategic Context

The department considers that the proposal is consistent with and/or supports the following local/state/regional strategies:

- key policy commitments of NSW 2021, including the following:
  - to increase investment in infrastructure that will provide for improved health services;
  - to increase employment opportunities; and
  - to stimulate the growth of critical industries that will support the growth of NSW.
- the proposal will assist in meeting the South Coast Region Strategy job targets and support the growth of Bega Town centre.
- The commitment of Council to support a regional hospital in Bega Valley, as set out in Bega Valley 2030 which establishes key policy directions for BVSC.

## 2.9 Director-General's Requirements

Section 2.0 of the proponent's EIS addresses compliance with the Director-General's Requirements. The department is satisfied that these matters have been adequately addressed in the EIS. In conjunction with the Proponent's Response to Submission, the EIS has provided a thorough consideration and assessment of the proposal for determination purposes.

# 3. EXHIBITION CONSULTATION AND SUBMISSIONS

## 3.1 Exhibition

In accordance with section 89F of the EP&A Act and clause 83 of the Regulation, the Director-General has made the application and accompanying information publicly available for at least 30 days following the date of first publication, in accordance with the Regulation and the department's policy, as detailed in **Table 2** below.

**Table 2: Exhibition Details**

Exhibition/Notification	Medium	Dates
Publicly exhibited	DPI Information Centre, Bega Valley Shire Council Administration Centre, Bermagui Branch Library, Eden Branch Library, Merimbula Branch Library and on the department's website.	25 October 2012 to 23 November 2012
Newspaper notice	Merimbula News	Published 24 October 2012
Newspaper notice	Bega District News	Published 19 October 2012
Newspaper notice	Eden Imlay Magnet	Published 18 October 2012
Written notices to	Adjoining landholders and relevant public agencies and BVSC. Notice was also provided to the Bega, Merriman and Eden Local Aboriginal Land Council's.	Dated 22 October 2012 and 15 October 2012, respectively.

The department received thirteen (13) submissions during the exhibition of the application – eight (8) submissions from public agencies, one (1) submission from BVSC and four (4) submissions from the general public. A summary of the issues raised in submissions is provided below.

### 3.2 Public Authority Consultation and Submissions

Nine (9) submissions were received from public authorities, as detailed below in **Table 3**. No objections to the proposed development were raised, however detailed comments and recommended conditions were provided by Bega Valley Shire Council.

**Table 3: Public Authority Submissions**

Agency	Comments	Department Comment
<p><b>Bega Valley Shire Council</b></p>	<ul style="list-style-type: none"> <li>• In principle, council raises no objections to the proposal.</li> <li>• The following key comments have been made by Council:                             <ul style="list-style-type: none"> <li>○ All hollow bearing trees proposed for removal be observed for bats.</li> <li>○ The Stage 2 proposal should include significant provision for rainwater harvesting and reuse.</li> <li>○ The provision of a 700m shared pedestrian and cycle pathway along the eastern side of Tathra Road linking back to Bega is fundamental to the project.</li> <li>○ Council staff concur with the recommendations of the proponent's flood reports.</li> <li>○ Further provision for staff bicycle parking should be considered.</li> </ul> </li> <li>• The 60km/h speed zone should be extended further south past the intersection of Tathra Road and Boundary Road.</li> <li>• The speed environment at Tathra and Boundary Road should be reconsidered.</li> <li>• Consideration should be given to either permanently closing the connection to Bega-Tathra Road at Howard Avenue, or physically banning both right and left turn movements onto Bega-Tathra Road.</li> <li>• Consideration should be given to relocating the flight path further to the north so that helicopter access to the site is mainly over agricultural zoned land.</li> <li>• The potential for contamination of the Bega River alluvial aquifer during construction will need to be fully mitigated.</li> <li>• The upgrade of the Bega-Tathra Road will suitably address any contribution requirements under Council Section 94 Contribution Plan.</li> <li>• A security deposit or unconditional bank guarantee of \$250,000 is to be paid to maintain all civil engineering works for this development until the completion of the works.</li> <li>• Water and sewerage strategies are to be developed. The proponent will be required to pay sewer and water contributions.</li> <li>• The MUSIC modelling supports on-site detention design based on the ARI of only 1:2 and this is sufficient to maintain environmental outcomes for smaller storm events.</li> </ul> <p>Council's submission has included a list of standard conditions and project specific conditions relevant to Stage 1 of the project including those matters raised above. Council's standard working hours condition would restrict construction to 8am and 1 pm on Saturdays.</p>	<p>Refer to section 4.2.5.</p> <p>This matter has been addressed by a condition of consent.                      Refer to section 4.2.2.</p> <p>Refer to section 4.2.6.</p> <p>This matter has been addressed by a condition of consent.</p> <p>Refer to section 4.2.2.</p> <p>Refer to section 4.2.3.</p> <p>Refer to section 4.2.8.</p> <p>Refer to section 4.2.9.</p> <p>Refer to section 4.2.6</p> <p>Refer to recommended Conditions of Approval.</p>
<p><b>Office of Water-Department of Primary Industries (DPI)</b></p>	<ul style="list-style-type: none"> <li>• Raised no objection to the proposal and notes that the proponent needs to be advised that any proposed use of the Crown road adjacent to the southern boundary of the site, either for construction purposes or within any future</li> </ul>	<p>The proponent's EIS incorrectly identifies 'Hospital Drive' as a "crown" road. This is a 'public road', vested in</p>

	<p>stages of the development, will require approval from the Catchment &amp; Lands Division of the DPI.</p> <ul style="list-style-type: none"> <li>The stormwater management strategy for the site does not appear to meet the criteria for protection of wetlands quality as detailed in the NSW Wetlands Management Policy.</li> </ul>	<p>Council. Therefore, DPI's consent as landowner is not required. Refer to section 4.2.6.</p>
<b>Roads and Maritime Services (Transport)</b>	<ul style="list-style-type: none"> <li>There is deficiency in sight lines at the intersection of Tathra Road with both Boundary Road and Kerrisons Lane. Road safety issues will be exacerbated by increased traffic volumes as a result of the Bega Bypass. Council should explore appropriate treatments to address this issue.</li> <li>Direct access to Tathra Road from the subject property is not permitted.</li> <li>Recommend that a shared pathway for pedestrians and cyclists be constructed linking Hospital Drive at Tathra Road from Harry Scanes Avenue to Rose Street.</li> <li>Standard conditions are recommended by the RMS to address design, construction and certification requirements. Subject to these conditions, the RMS has advised that it issues its concurrence under Section 138 of the <i>Roads Act, 1993</i>. <i>Note:</i> Council as roads authority will be responsible for issuing the section 138 consent for the works within the classified road reserve and ensuring that the works are designed and constructed in accordance with relevant standards.</li> <li>The consent authority has a responsibility to consider any environmental impacts of any road works which are ancillary to the development.</li> </ul>	<p>Refer to section 4.2.2</p> <p>Refer to section 4.2.2.</p> <p>Refer to section 4.2.2.</p> <p>Refer to recommended Conditions of Approval.</p> <p>Refer to section 4.2.2.</p>
<b>NSW Rural Fire Services</b>	<ul style="list-style-type: none"> <li>Raised no objection to the proposal.</li> <li>No conditions are recommended.</li> </ul>	<p>Refer to comments in Appendix B.</p>
<b>Air Services Australia</b>	<ul style="list-style-type: none"> <li>Raised no objection to the proposal.</li> <li>No conditions are recommended.</li> </ul>	<p>Refer to section 4.2.3.</p>
<b>Heritage Branch- Office of Environment and Heritage</b>	<ul style="list-style-type: none"> <li>Raised no objection to the proposal.</li> <li>The Heritage Branch recommends that the potential for historic archaeology be investigated and an archaeological management strategy be developed, if appropriate.</li> <li>A standard condition could be imposed relating to the discovery of historic archaeological deposits/relics.</li> </ul>	<p>Refer to section 4.2.4.</p>
<b>Conservation &amp; Regulation Division- Office of Environment and Heritage</b>	<ul style="list-style-type: none"> <li>Expressed support for the proposal.</li> <li>No issues are raised and no conditions are recommended.</li> </ul>	<p>Noted.</p>
<b>Environmental Protection Authority NSW</b>	<ul style="list-style-type: none"> <li>The EPA has raised no objection to the proposal.</li> <li>A number of conditions are recommended to improve environmental and community outcomes for the project including the following: <ul style="list-style-type: none"> <li>The preparation and implementation of: <ul style="list-style-type: none"> <li>A Construction Noise Management Plan; and</li> <li>Waste Management Strategy.</li> </ul> </li> <li>The Soil and Water Management Plan has a number of deficiencies.</li> <li>The amount of fill required is above the threshold for the scheduled activity 'Waste-Application to Land' and will require an Environmental Protection Licence if the fill does not meet the exemption guidelines for Virgin Excavated Natural Material (VENM) or Excavated Natural Material (ENM).</li> <li>The presence of asbestos containing materials (ACM) on the site should be confirmed.</li> </ul> </li> </ul>	<p>Refer to section 4.2.8.</p> <p>Refer to section 4.2.7.</p>

	<ul style="list-style-type: none"> <li>The Environmental Noise Impact Assessment for the future stage 2 DA should consider the possibility of noise-enhancing meteorological conditions.</li> </ul>	A condition has been included in the development consent to address this requirement.
<b>Transport for NSW</b>	<ul style="list-style-type: none"> <li>Supports measures to encourage public transport access to the site.</li> <li>Intersections and roundabouts on all bus service roads should be designed to safely and adequately accommodate buses.</li> <li>Transport NSW and local bus operators should be consulted prior to the completion of the development to determine an appropriate bus service to the site.</li> </ul>	Refer to section 4.2.2.

### 3.3 Public Submissions

Four (4) submissions were received from the public including one (1) submission lodged in support of the application and one (1) late submission. Two (2) submissions raise issues in relation to the strategic decision to locate the facility in Bega. Key issues raised in the public submissions are listed in **Table 4**.

**Table 4: Public Submissions**

Sub.	Issue	Department comments
1.	<p>Submission from property owners of 1556 Tathra Road, Bega</p> <ul style="list-style-type: none"> <li>Offers general support for the proposal. As the property owner directly adjoining the site, requests clarification on a number of matters including the following:                             <ul style="list-style-type: none"> <li>Whether the existing access point to the property off Tathra Road will be used for the development?</li> <li>Whether a sufficient vegetated buffer zone will be provided between the property and the development?</li> <li>Whether a fence will be provided of sufficient height and durability as to prevent access to the property from the hospital site?</li> <li>Whether the speed limit on boundary road will be reduced?</li> </ul> </li> </ul>	Refer to section 4.2.2 (Access and Traffic) and section 4.2.3 (Amenity).
2.	<p>Confidential submission</p> <ul style="list-style-type: none"> <li>Advises on the process that has lead to the proposed siting of regional hospital in Bega.</li> <li>Asserts that the process leading to the purchase of the site was to benefit a Bega land owner/developer.</li> <li>The DA consent given for subdivision by Bega Valley Shire Council uses conflicting reports to obtain its conclusions.</li> <li>The site is flood prone.</li> <li>The projected population &amp; site criteria figures used are incorrect including those presented in the Coffey Projects 'Sub Regional Selection Strategy' dated November 2007 which was used to justify the siting of the hospital in Bega.</li> </ul>	<p>Comments made in relation to the site selection, subdivision and land purchase are not relevant matters for consideration in the determination of this application.</p> <p>Refer to section 4.2.6. Refer to section 2.9.</p>
3.	<p>Confidential submission</p> <ul style="list-style-type: none"> <li>The proposal should be located close to services already provided by Bega's Doctors- there are very strong economic and social reasons why services should be co-located in one town.</li> </ul>	Refer to section 2.9.
4.	<p>Submission prepared by Planning Initiatives on behalf of Mr Ray Miller of Applegum Properties Pty Limited (owner of Lot 2 DP 1176012).</p> <ul style="list-style-type: none"> <li>Council propose to zone land to the north and to the north/east of the hospital site R3- Medium Density Residential and RU1 Primary Production, respectively.</li> </ul>	The matters raised in this submission have been adequately addressed in Council's comments on the proponent's RTS- refer to section 3.4 below.

Sub.	Issue	Department comments
	<ul style="list-style-type: none"> <li>The RU1 Primary Production zone would permit construction of a dwelling. The majority of Lot 2 is flood liable and locations to site a dwelling are limited. The best location would be opposite the proposed helipad site. However, the helipad would have such a detrimental impact on the dwelling and would reduce the marketability of the property.</li> </ul>	

The department has fully considered the issues raised in submissions in its assessment of the project. As relevant, the matters raised are considered in **section 3.4** and **section 4.0** below.

### 3.4 Applicant's Response to Submissions

Urbis on behalf of Health Infrastructure NSW provided a response to the issues raised in the submissions (RTS) on 14 December 2012. In its RTS, the proponent has confirmed the following:

- A commitment to deliver the 700 metre shared footway to link the hospital site with Rose Street and to work with Council to resolve the design detail and timing for implementation.
- To undertake a microbat survey in early/mid December 2012 in response to issues raised in Council's submission. The outcomes of the survey are detailed in section 4.2.5 in the department's assessment of ecology. In summary, conditions have been recommended by the project ecologist to mitigate the impacts of the development on the site's ecology, including a requirement to inspect hollow bearing trees prior to tree removal and the install 94 habitat boxes within the site.
- The Proponent does not agree to the following conditions as recommended by Council:
  - The restriction of construction working hours between 8am and 1pm on Saturdays.
  - The provision of \$250,000 to Council as security for necessary maintenance of civil engineering works until the development is completed.
  - The application of the standard contributions pursuant to section 64 of the Local Government Act and Water Management Act 2000 for water supply and sewerage, given the net community benefit of the proposed hospital.

The RTS includes an amendment to the staged development application to incorporate a Geothermal Energy Storage System (GES System) in the south-eastern corner of the site. The environmental impacts of the GES System are considered below in **section 4.2.1**. Key agencies have raised no objection to this aspect of the proposal in their comments on the proponent's RTS. The refined building design and construction of the GES System will be a matter for detailed consideration and assessment in the future Stage 2 development application.

The RTS was referred to key agencies and Council for consideration and comment. Following the close of submissions on the RTS, Council and the Office of Water/DPI provided the following further comments on the project.

#### **Council:**

In response to the Proponent's RTS, BVSC has advised as follows:

- Bond for extended maintenance:** Reconfirmation that the provision of the \$250,000 security bond to Council is to cover any damage to civil infrastructure is required. Health Infrastructure is proposing that all Council infrastructure be constructed in Stage 1 of the project including the roundabout and new public road (Hospital Drive). Council is concerned that the future Stage 2 (hospital building) construction may have a detrimental impact on new Council infrastructure, including the 'expected life' of both assets. Council maintains that the security is required to cover any maintenance responsibility and furthermore, that the bond will be fully refundable once the project is completed.

Council has also advised that it would prefer for the road infrastructure to be constructed prior to the completion of Stage 2 in order to limit potential damage to its assets.

As a consequence of further discussions with Council, the proponent has agreed to the terms of the bond. It is noted that road construction will remain as part of the Stage 1 works. The department is satisfied that the bond provides adequate security to Council against any damage to its future asset.

- Concept Sewer Strategy:** The proponent's preparation of a Concept Sewer Strategy is required to be submitted and approved by Council prior to the issue of the section 109R certificate.
- Section 64 Contributions:** Council has advised that it intends to work closely with the proponent to achieve a balanced, cost neutral outcome for the community. Council does not accept the

applicant's response (ie. that standard rates should not apply to the hospital given the net community benefit of the proposed hospital) given the potential significant capital cost implication for the broader community.

As a result of further discussions between Council and the proponent, Council has agreed to modify its terms regarding the section 64 contribution. In this regard, the contribution will be offset against any allowable credits calculated for the closure or change of use of the existing Bega District Hospital.

- **Geothermal Energy Storage System:** Council supports the proposal due to the energy, greenhouse and cost savings it provides. Any future DA should reference appropriate industry standards.
- **Response to RMS submission:** Council acknowledges the issues raised in the submission from the RMS in relation to the adequacy of the Boundary Road/Tathra Road intersection and the Kerrisons Lane/Tathra Road intersection. Council has advised that changes to the speed limits at both intersections should be pursued with the RMS.

Council has advised that further consideration should be given to either permanently closing the connection to Bega-Tathra Road from Howard Avenue, or physically banning both right and left turn movements onto Howard Avenue from Tathra Road.

**Office of Water:**

The Office of Water has confirmed that a detailed assessment of the potential impacts of the Geothermal Energy Storage System will be required with the future Stage 2 application, including potential impacts of construction and operation on the following:

- Groundwater and groundwater dependent ecosystems and the nearby watercourses and wetlands;
- Aquifer interference implications; and
- Water licensing requirements.

In addition to the above, the Office of Water has advised that the use of the 1 in 2 year storm event for on-site stormwater detention has not been demonstrated to mitigate impacts to wetlands with respect to both water quality and quantity purposes. On this basis, the Office of Water has requested that the proponent demonstrate:

- The quality of water discharging from the site into the wetlands will not degrade the wetland's existing water quality, consistent with the NSW Wetlands Management Policy.
- The quantity of water that is discharged from the site will not degrade the wetlands and adversely alter the hydrology of the wetlands.

Further consideration to the RTS and the issues raised by Council and the Office of Water are provided in section 4.0.

**4. ASSESSMENT**

**4.1 Section 79C Evaluation**

**Table 5** identifies the matters for consideration under section 79C that apply to State significant development, in accordance with section 89H of the EP&A Act. **Table 5** also represents a summary for which additional information and consideration is provided for in **section 4.2** and relevant appendices or other sections of this report and the EIS. The EIS has been prepared by the proponent to consider these matters and those required to be considered in the DGRs and in accordance with the requirements of section 78A(8A) of the EP&A Act and Schedule 2 of the Regulation.

**Table 5: s79C(1) Matters for Consideration**

s.79C(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Consideration of relevant EPIs has been undertaken at <b>Appendix B</b> . The proposed development achieves a satisfactory level of compliance, with the exception of height. This is considered further in section 4.2.1.
(a)(ii) any proposed instrument	DBVLEP has been considered in the assessment of this application. DBVLEP seeks to rezone the hospital site SP2-Infrastructure. Pursuant to Part 2 of DBVLEP, the New Bega Hospital is identified on the relevant Land Zoning Map as a permissible land use with consent. The Height of Buildings Map

	and the Floor Space Ratio Map do not identify any development standards applying to the site.
	On the basis of the above, it can be concluded that the proposal to accommodate a regional hospital on this site is consistent with the draft instrument.
(a)(iii) any development control plan	Clause 11 of State Environmental Planning Policy (State and Regional Development) 2011 provides that development control plans do not apply to State significant development. Notwithstanding, consideration of relevant controls has been provided at <b>Appendix B</b> and the proposal has been assessed as being generally consistent with the relevant development control plans.
(a)(iia) any planning agreement	A planning agreement is not required in this instance. Bega Contribution Plan No.1- <i>Existing Rural Roads</i> applies to all land zoned 1(a) Rural General under BVLEP where traffic generating development is proposed. In this instance, Council has advised that a contribution is suitably offset by the works required to be undertaken by Health Infrastructure to upgrade Bega-Tathra Road to accommodate the hospital development.
(a)(iv) the regulations	The development application satisfactorily meets the relevant requirements of the Regulation, including the procedures relating to development applications (Part 6 of the Regulations), public participation procedures for SSDs and Schedule 2 of the Regulation relating to environmental impact statements.
(a)(v) any coastal zone management plan	Not applicable.
(b) the likely impacts of that development	The department's assessment report has given due consideration to the likely impacts of the proposed development.
(c) the suitability of the site for the development	The proponent's EIS has documented the site selection process undertaken of feasible alternative sites for the hospital. This included key planning considerations in addition to requisite key site attributes including the main road frontage to provide clear way finding for public and private transport to the site, and provision of sufficient land for the future expansion of the hospital facility. Of the five (5) sites originally considered in the region, the subject site was found to best satisfy the functional design requirements for a Regional Hospital now and into the future. In addition to the above, the hospital use is permissible in the zone pursuant to the provisions of BVLEP and DBVLEP.
(d) any submissions	Consideration has been given to submissions received during the exhibition of the development application, as detailed in <b>Table 3</b> and <b>Table 4</b> . Key issues raised include: traffic and transport; amenity; site ecology; construction impacts; stormwater/drainage; contamination and developer contributions. These issues have been comprehensively addressed in section 4.2 of this report.
(e) the public interest.	Refer to Conclusion.
Biodiversity values exempt if: (a) On biodiversity certified land? (b) Biobanking Statement exists?	Not applicable. Not applicable.

#### 4.2 Key and Other Issues

The department considers the key environmental issues for the application to be:

- built form and urban design;
- traffic, parking and access;
- amenity impacts;
- heritage;
- site ecology;
- stormwater management;
- site contamination;

- construction impacts; and
- developer contributions and securities.

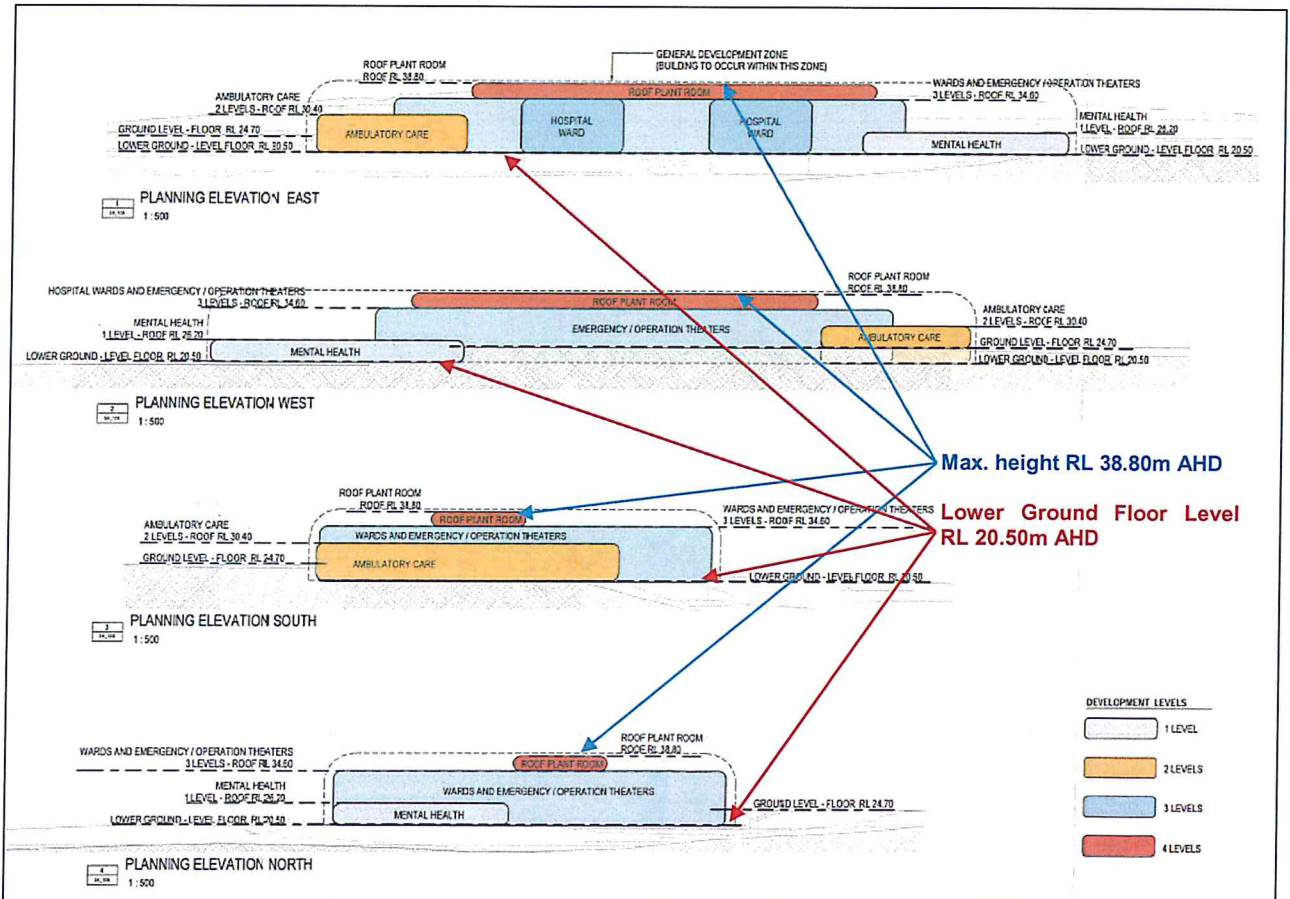
**4.2.1 Built form and urban design**  
**The Staged Development Application**

The staged development application includes a concept proposal for the development which seeks approval for the building envelope for the hospital and the general site layout. As illustrated in **Figure 4** below, the envelop has been derived to accommodate a three (3) storey hospital building with a floor area of approximately 26,000m<sup>2</sup> and an upper level of rooftop plant. The proposed building envelope for the hospital will have a maximum height of 14.1m when measured in accordance with BVLEP (i.e. excluding the rooftop plant level).

The site is proposed to be re-profiled to accommodate the development. An RL of 20.5m AHD is proposed for the lower ground floor level and has been established to ensure the building is above the Probable Maximum Flood (PMF) level for the site.

The hospital building has been sited to maximise outlook over the flood plain and Bega River. Its position in conjunction with the re-profiling of the site will mean that the development nestles into the landform and is well setback from neighbouring residential development (particularly the western and southern site boundaries). Extensive site landscaping is proposed and will further assist in reducing the visual impact of the development. Whilst the height of the development exceeds the 10 metre height limit specified in clause 85 of BVLEP by 4.1 metres, the department is satisfied that the indicative form and massing proposed for the hospital is appropriate in this rural context. It is noted that the DBVLEP does not nominate a height limit for the site and furthermore, that Council has raised no objection to the general height and form of the development.

Matters relating to amenity impacts arising from the proposed envelopes are considered in **section 4.2.3** below.



**Figure 4: Building envelope (source: BVN Architecture)**

The Stage 1 works propose the construction of the infrastructure and roadways necessary to access and service the site. The general layout has been devised in consultation with Council and the RMS. Subject to the final engineering design satisfying the requirements of Council and the RMS, the

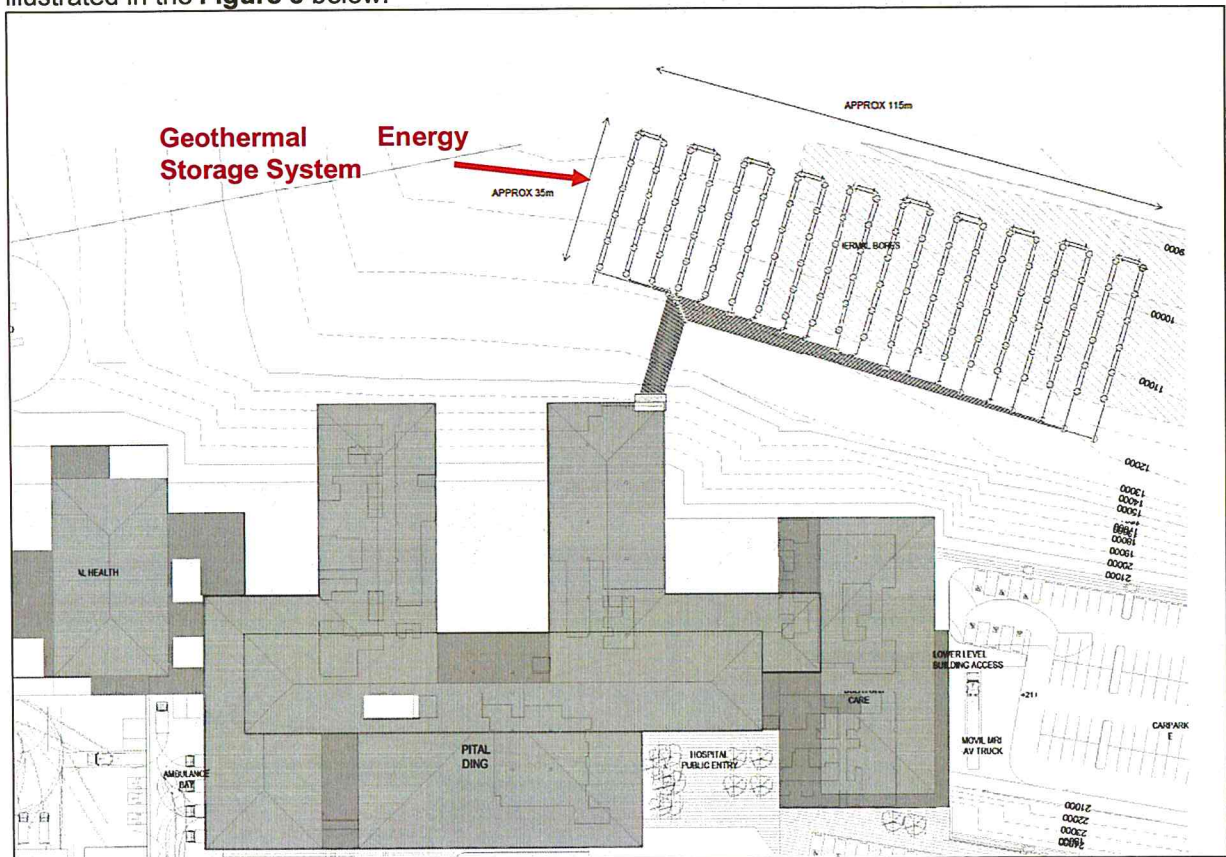
department raises no objection to these aspects of the proposal, and the ultimate building design will be subject to separate assessment as part of the future Stage 2 application.

### **Geothermal Energy Storage System (GES System)**

As detailed above, the proponent's RTS includes an amendment to the concept proposal to incorporate the installation of a GES System adjacent to the northern site boundary, as illustrated in the **Figure 5**. A report on the GES System, prepared by Steensen Varming (Australia) Pty Ltd and submitted with the proponent's RTS, advises that the system is proposed due to the lack of natural gas supply to the site. Council has confirmed that a piped gas supply is currently unavailable to the Bega Valley. Accordingly, the proponent has explored alternative fuel sources which are capable of meeting the thermal energy requirements for the site. The GES System has been selected as being capable of providing the optimal base heating and cooling solution for the hospital.

The Steensen Varming (Australia) Pty Ltd report also advises that the GES System will result in significant benefits in energy savings, running costs and carbon dioxide reductions.

The concept for the GES System comprises three main elements: an earth connection, a heat pump and an exterior heating or cooling distribution system. The earth connection, in this instance, is proposed to comprise a series of closed loop pipes which would be installed some 120 metres under the ground and over an area with a dimension of approximately 115 metres by 35 metres, as illustrated in the **Figure 5** below.



**Figure 5: Layout of Geothermal Energy Storage System (Source: Steensen Varming (Australia) Pty Ltd)**

The proponent has advised that similar GES Systems have been installed at Lithgow Hospital, the Surry Hills Community Centre, Western Sydney Records Centre, the Macquarie University Administration Building and the Sydney Water Police Headquarters. Other examples of National and International projects have also been provided.

The technical reports submitted with the application including the geotechnical report and the contamination assessment reports do not assess the environmental impacts of this element of the concept proposal. The Office of Water has also advised in its submission on the RTS, that the proponent has not addressed the potential for the GES system to impact on the groundwater, groundwater dependent ecosystems and the nearby watercourses and wetlands. The Office of Water has recommended conditions to ensure that these potential impacts on ground water are fully considered in the future Stage 2 application.

The department acknowledges the positive environmental benefits which will result from the GES system. Council has also advised of its general support for this element of the project, subject to appropriate management and decommissioning procedures being followed.

Given its proposed location (ie. in close proximity to Bega River and associated wetlands, and given the hydrology of the area), the department considers that detailed and thorough consideration to potential environmental impacts arising from the GES System is required during the consideration of the future Stage 2 application. In this regard, whilst the general concept and rationale behind the installation of such a system is supported, the department considers that the environmental impacts of this element of the concept proposal must be thoroughly assessed to ensure that the potential to impact on the hydrology and ecology of the area is fully understood and if required, is appropriately controlled through relevant mitigation measures. Accordingly, appropriate conditions are recommended that will ensure that these matters are considered as part of the Stage 2 development application.

The department notes that no site enabling works are proposed in Stage 1 for this element of the project.

#### 4.2.2 Traffic, Parking and Access

##### Traffic

The traffic impacts of the proposal have been assessed in the Transport Assessment (TA) prepared by SKM. For the purposes of assessing the traffic impact on the local and regional road network, the TA has assumed an annual increase in traffic of 2% to predict the performance of seven (7) key intersections. A SIDRA analysis has also been undertaken to determine the level of service (LoS) at these intersections. The results are predicted for the summer of 2016 (when the hospital is proposed to be opened) and summer 2025 (which includes a 20% expansion of the hospital, for sensitivity testing). The results do not take into account the proposed Bega Bypass which is currently under construction and which the TA advises, is likely to result in a reduction in general traffic on Tathra Road.

SKM has advised that the trip generation rates used for the TA are based on data provided by Health Infrastructure and general NSW and UK hospital experiences. The trip generation rates used are some 20% higher than the RTA Guidelines, which SKM does not consider provide an accurate representation of trips associated with the proposal. At the hospital opening in 2016, the trip generation is anticipated to be equivalent to 205 two-way trips during the AM peak and 180 two-way trips during the PM peak.

In summary, the results of the TA predict the following:

- Summer 2016: during the operation of the hospital, all intersections will operate at LoS C (satisfactory) or better. This is consistent with the LoS predicted without the hospital development. The exception is the intersection of Boundary Road/Princes Highway (Intersection 6) which will remain at LoS D during the PM peak (4.15pm -5.15pm) and is likely to benefit from reduced traffic as a result of the Bega bypass. The TA concludes that the operational performance of intersection 6 will not be significantly impacted by the development given the hospital is predicted to generate only seven (7) vehicular trips at this intersection; and
- Summer 2025: all intersections will operate at LoS C (satisfactory) or better. This is consistent with the LoS predicted without the hospital development. The exception is the intersection of Boundary Road/Princes Highway (Intersection 6) which deteriorates to LoS F (extra capacity required- extreme delays, traffic signal or other major treatment recommended) during the PM peak (4.15pm -5.15pm) and the intersection of Kerrison Lane and Princes Highway (Intersection 3) which will operate at LoS E (at capacity, requires other control mode) during the AM peak (8.00am – 9.00am). The TA concludes that under the robust scenarios used to predict the traffic volumes at both Intersections 3 and 6, the operation of the hospital will have minimal impact on the function of these intersections. Furthermore, as stated above, the positive impacts of the Bega Bypass have not been taken into account.

Having regard to the above, the TA recommends that no mitigation measures are necessary at any intersections as a result of the development. BVSC and the RMS have not made any recommendations in relation to the need for either Intersections 3 and 6 to be upgraded as a result of this development. The department concurs with the advice of the BVSC and RMS.

Notwithstanding this, concerns have been raised by BVSC and the RMS in relation to the safety and speed environments at the intersections of Tathra Road with Boundary Road and Kerrison Lane. Matters in relation to intersection upgrades of these intersections are considered below in conjunction with the assessment of speed limits.

### **Speed limits**

The construction of the roundabout in Tathra Road will facilitate the need for changes to the speed zone in Tathra Road. Tathra Road currently operates with a 100km/h speed zone and both the RMS and BVSC have advised that a 60km/h zone will be enforced at the roundabout. BVSC has suggested that the speed limit needs to be extended further along Tathra Road to improve the safety and speed environment at Boundary Road and furthermore, that the operation of the Howard Avenue intersection with Tathra Road needs to be reconsidered to further restrict or ban access to and from Tathra Road.

The RMS has advised of its strong concerns regarding the deficient sight distances at the intersections of Tathra Road with Boundary Road and Kerrisons Lane and has advised that the current sight lines do not comply with the Austroads *Guide to Road Design Part 4a: Unsignalised and signalised intersections for the 100km/h speed zone*. The RMS has suggested that Council explore appropriate intersection treatments to address this issue. Council has advised in its response to the proponent's RTS, that the RMS has been approached to assist in a reduction in the speed limit in the area but the RMS does not support such changes.

Council has advised that the traffic impacts from the development alone are not sufficient to warrant upgrading the intersections but that a reduction in the speed zones would improve driver safety. Council's recommended conditions do not address any requirement for the proponent to make a contribution toward such intersection upgrades.

Having considered the views of both Council and the RMS on this issue, it is evident that a detailed review is needed of these key intersections and the short to medium term traffic environment of Tathra Road. Having considered the proponent's TA, the department supports the view of Council that the development alone does not trigger the need for intersection upgrades. Those works which are to be undertaken in Stage 1 will result in immediate changes to the speed zone relative to the new roundabout and in part will address some of the concerns raised by Council and the RMS. However, the department considers that further traffic management measures are required to ensure the safety of Tathra Road. For this reason, it is recommended that the department request further consideration be given to this matter with the view to ensuring that appropriate traffic management measures are installed prior to the operation of the hospital. The department notes that the enforcement of reduced speed limits along Tathra Road and the restricted access at Howard Avenue could be easily addressed in the short term through new signage enforcing new speed limits and access restrictions.

### **Parking**

The staged development application proposes the provision of 485 car parking spaces on the site and three (3) overflow carparks for the future expansion of the hospital. The Stage 1 application proposes the construction of 485 car parking spaces as part of the construction enabling works along with two temporary car parking areas for construction adjacent to Hospital Drive.

The quantum of parking proposed on the site has been negotiated in consultation with Council and the RMS, in the absence of BVSC having any appropriate parking standards for a hospital development of this nature. Based on the provision of a 136-bed hospital and the associated patient support, staffing and visitor requirements, the provision of 485 spaces has been determined to be sufficient to meet daily demands of the hospital.

The TA submitted with the application predicts that a vast majority of people accessing the site will be via motorised transport. It is estimated that at occupation in 2016 that only 7.5% of people will arrive at the site by bicycle, walking or other means.

Council and the RMS have raised no objection to this aspect of the proposal.

The department has assessed the car parking design, including the proposed landscaping scheme and finds this aspect of the proposal to be acceptable.

### **Public Transport**

There is currently no public transport access to the site and only limited bus services available on Tathra Road. The staged development application includes provision for a public bus service to the site with the provision of a bus stop close to the main entrance to the hospital. The Transport Assessment prepared by SKM advises that local bus operators are currently being consulted with respect to providing services to the site.

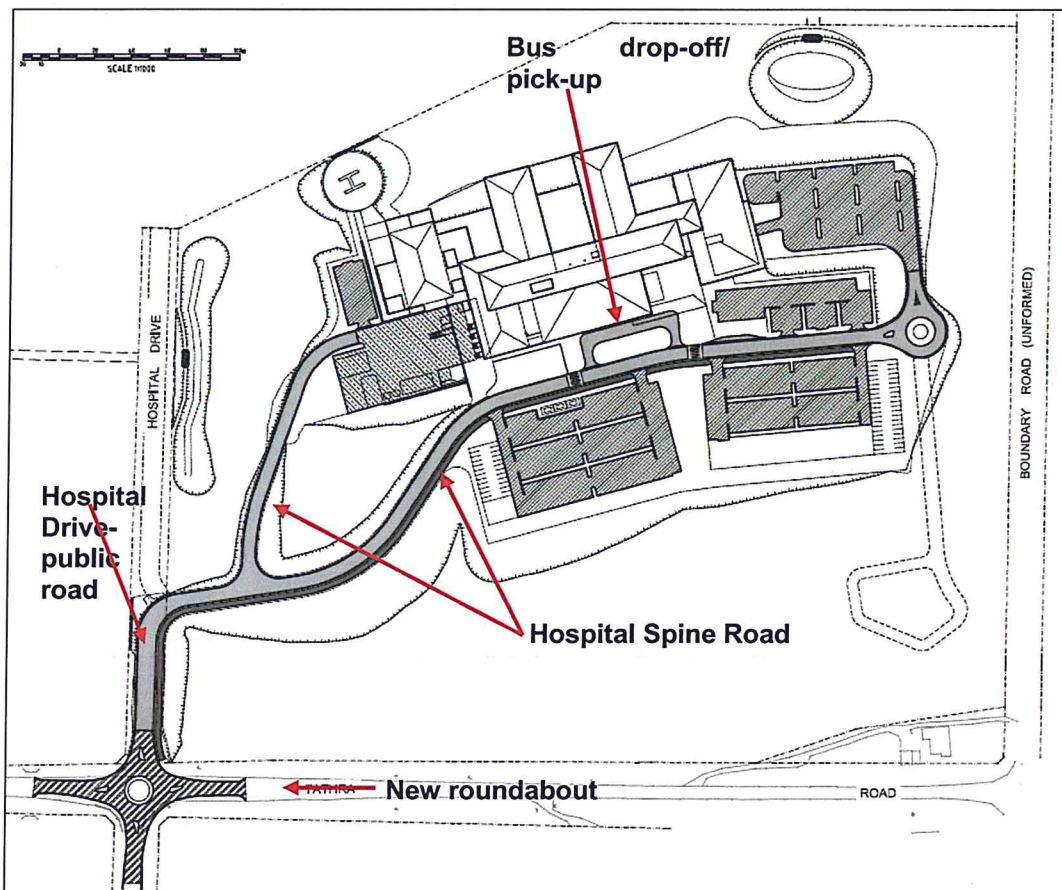
The department notes that the internal roads have been designed to accommodate buses, given the location of Tathra Road being some 500 metres from the hospital entrance. A bus bay has been provided to the south of the main hospital entry- refer to **Figure 6** below.

The proponent is currently resolving public transport access to the site with service providers. An appropriate condition has been recommended to require the provision of public transport as part of the future Stage 2 application. The requirements to consult with Transport NSW and to provide safe and convenient access to and from bus stops to the hospital has been incorporated in the development consent.

### **Vehicular Access**

Vehicular access to the site is currently restricted to a farm track which runs parallel to the northern boundary of the site and is accessed directly off Tathra Road. In order to facilitate improved vehicular access to the site, including for service vehicles (and potentially public transport), the staged development application includes the following road works, as illustrated in **Figure 6** below:

- Construction of a new four-armed roundabout at the intersection of Harry Scanes Avenue and Tathra Road and associated road works. The eastern arm off the roundabout is proposed to provide direct access into the Hospital site;
- Construction of Hospital Drive, a new public road. The land which will accommodate this road was dedicated to Council as 'public land' as part of the development application for the subdivision to create the lot for the proposed hospital site. The location of the public road is illustrated on the registered plan of subdivision;
- Hospital Drive is proposed as an 11m wide carriageway with a 3 metre wide shared pedestrian/cycle path on the southern side. The road will be subject to parking restrictions; and
- Construction of Hospital Spine Road directly off Hospital Drive. The road is proposed as a private road to access the hospital facilities, associated car parking and service areas. A shared pedestrian/cycleway runs along the western edge of the roadway and a number of pedestrian crossings. This road has been engineered to accommodate services vehicles, buses, emergency vehicles and MRI mobile scanners



**Figure 6: Vehicular Access arrangements**

The concept for the road design has been the subject of detailed discussion between the proponent, Council and the RMS. Council and the RMS have raised no objection the proposal subject to their specified engineering design and construction requirements.

The department finds this aspect of the proposal to be acceptable and has incorporated the requirements of Council and RMS into the recommended development consent. Issues raised by Council in relation to the timing of construction of the road, securities against construction damage and developer contributions are addressed separately below in this assessment report.

### **Pedestrian Access**

Given the location of this site relative to Bega Town Centre and the predominant rural nature of surrounding land, general access to the site for pedestrian and cyclists is unavailable. In both submissions from the BVSC and the RMS, it is recommended that the development is of a sufficient scale and nature to warrant the construction of a shared pedestrian and cycle pathway linking the site with the Bega Town Centre. The pathway would be approximately 700m long and would be located on the eastern side of Tathra Road.

In its RTS, the proponent has committed to the provision of the pathway. The department acknowledges that the provision of the shared pathway is fundamental to promoting alternative modes of access to the site.

Stage 1 (construction enabling works) includes construction of a spine road and pathway to promote convenient access to the various medical services available within the site. The main entrance to the hospital is some 500m from Tathra Road. The department notes that the current proposal, as illustrated in **Figure 7** below, shows that the shared pathway within the site would be located on the southern side of Hospital Drive. This pathway will need to be designed to appropriately connect with the new shared pathway to the Bega Town Centre and furthermore, will need to provide for safe and convenient movement to and from the northern side of Hospital Drive to avoid the potential for pedestrian and vehicular conflict at the entry to the site off Tathra Road. A condition is recommended to address this matter with the final design to be approved by Council.

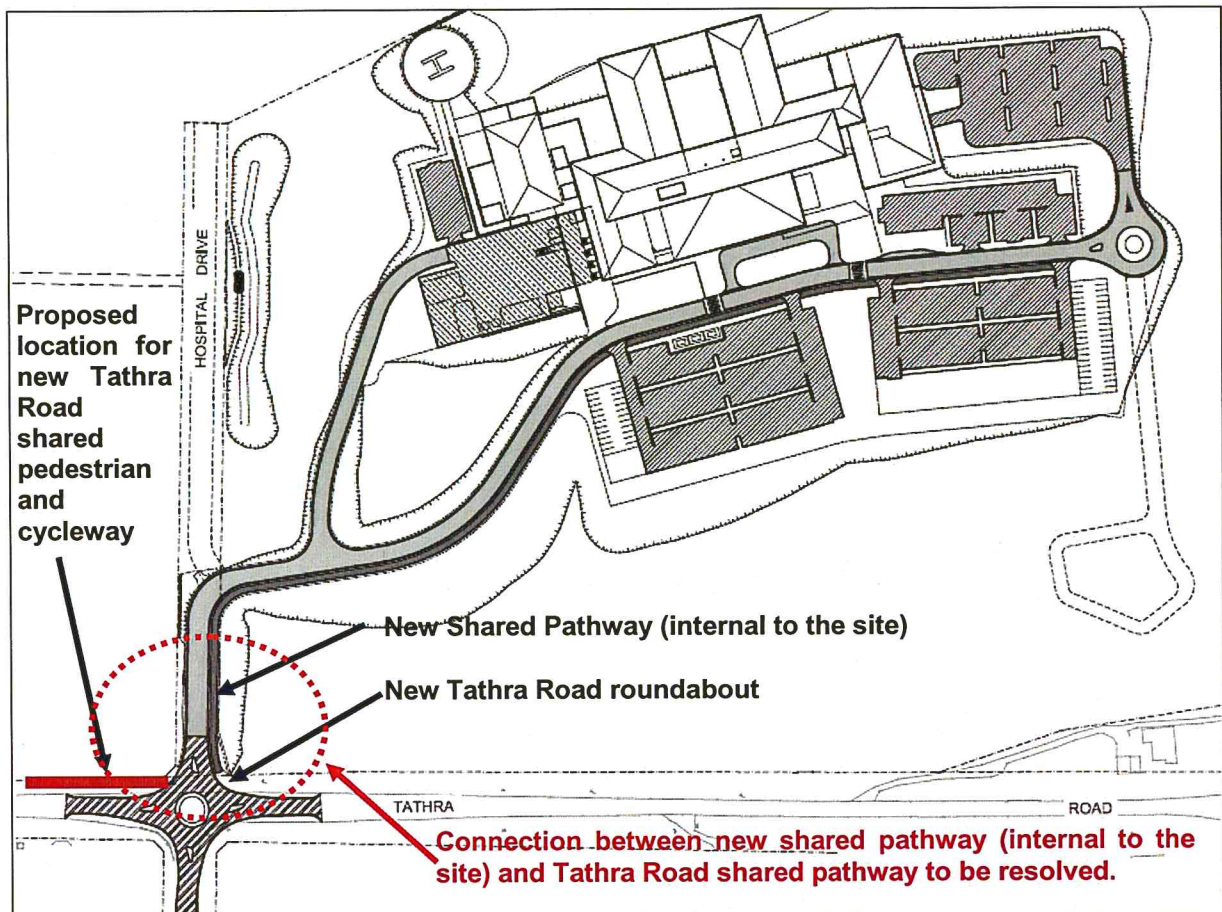


Figure 7: Resolution of pedestrian access

### 4.2.3 Amenity Impacts

#### Acoustic

Potential acoustic impacts to neighbouring properties as a result of the construction and operation of the hospital have been assessed in the Environmental Noise Impact Assessment (ENIA) prepared by SLR.

The nearest affected residential receivers have been identified on Boundary Road to the south of the site (approx. 200 metres to south), 23 Glen Mia Drive to the west of the site and 10 Taronga Street to the north of the site. The department notes that the ENIA does not undertake an assessment of noise impacts on 1556 Tathra Road, the residential property located immediately to the south-west of the subject site.

Monitoring for the purposes of establishing the background levels has identified that the ambient noise levels are largely dominated by traffic noise along Tathra Road. Therefore, the results of the continuous unattended noise monitoring, show results typical for rural-residential areas ie. low evening and night-time noise levels dominated by natural environment and daytime uses dominated by adjacent traffic noise.

The noise levels associated with the construction period have been predicted based on the worst case scenario with all construction equipment operating simultaneously. The noise levels during the construction period estimate that the daytime noise management levels will be exceeded by up to 23 dBA for the Stage 1 works and 8 dBA for the Stage 2 works, when measured at the nearest affected residential receivers. There is also likely to be additional noise associated with construction traffic. Although, this is likely to be limited during Stage 1 works, given the limited need for material delivery to the site.

The ENIA concludes that whilst the noise levels associated with the Stage 1 works do exceed the daytime noise management levels, they do not exceed 75dBA, and therefore, they are not considered to be 'highly noise affected', as defined by the Interim Construction Noise Guidelines. Mitigation measures are recommended to assist in reducing the noise levels during construction including the use of localised hoarding, less noise-intensive equipment and non-tonal reversing alarms.

The operational noise impacts of the project have been predicted in the ENIA and will be subject to detailed consideration in the Stage 2 application. The preliminary assessment concludes that:

- Noise emissions from mechanical plant associated with the operation of the hospital should be controlled to minimise impacts to nearby sensitive receivers.
- The use of the car parking area is unlikely to cause an adverse impact at nearby sensitive receivers.

The department concurs with the findings of the ENIA that a detailed Construction Noise and Vibration Management be required to be prepared prior to the commencement of construction. The careful management and the application of all feasible and reasonable noise mitigation measures will need to be employed to reduce the noise levels generated by construction to acceptable levels.

The department submits that noise levels associated with site establishment works (including bulk earthworks and services trenching) often exceed recognised noise management levels and are likely to be accentuated in a rural environment where background noise levels are typically low. Notwithstanding this, it is acknowledged that the Stage 1 construction works will be for a period of approximately 3 months and therefore the noise impacts will be short lived. Given the anticipated noise exceedances, prior to the commencement of construction the department recommends that the proponent develop a community consultation strategy to provide a mechanism to facilitate communication between the proponent (and its contractors) and community stakeholders (particularly adjoining owners) on construction progress and environmental management and furthermore, that residents located adjacent to the site be notified by letterbox drop of the construction program in addition to being provided with contact details should enquiries and/complaints arise during construction. Appropriate conditions are recommended to address these matters. Subject to compliance with these conditions, the department is satisfied that this aspect of the proposal is acceptable.

#### Other Amenity impacts

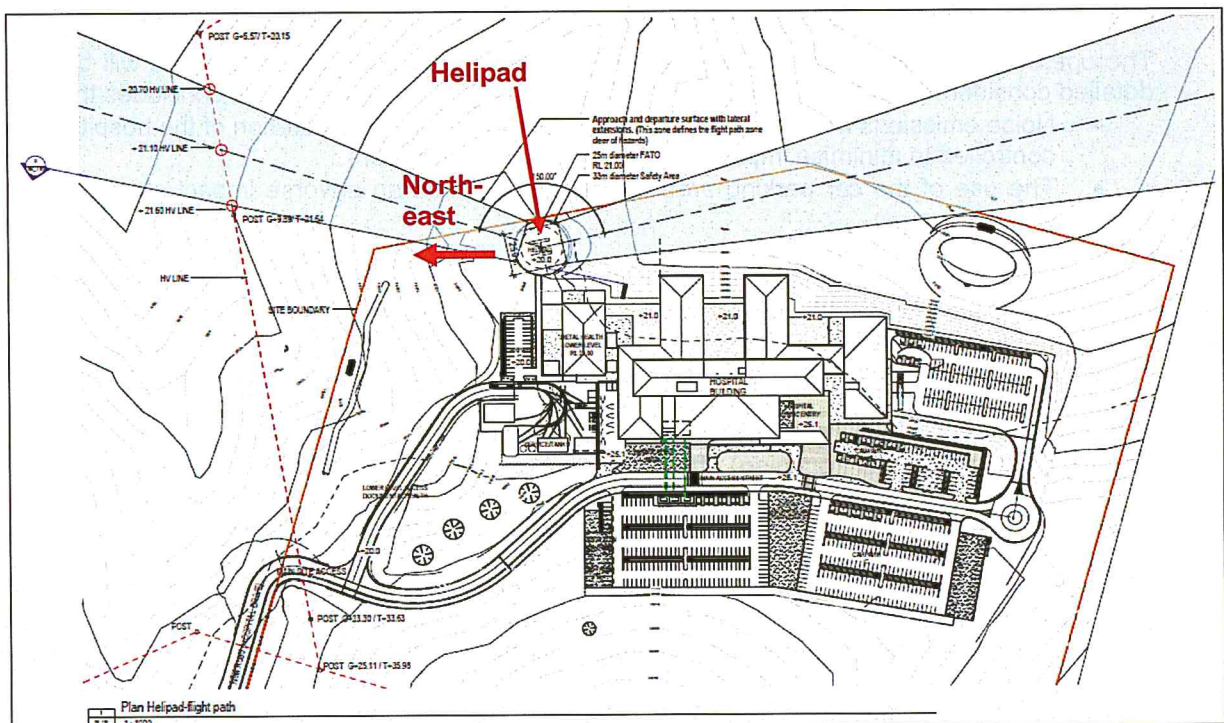
The department has assessed the proposal as being satisfactory in relation to the following matters:

- Lighting: All outdoor lighting for both Stage 1 and Stage 2 should comply with, where relevant, with AS/NZ1158.3: 1999 Pedestrian Area (Category P) Lighting and AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting. This includes any external lighting of carparking.

- **Overshadowing:** the shadow diagrams submitted with the concept proposal demonstrate that all shadows cast by the development will be contained within the site. This is a function of the building form and siting with generous setbacks to neighbouring properties. The general form of the development will result in the various hospital wings being provided with excellent solar access.
- **Landscaping:** the landscape concept for the site includes extensive tree planting to offset the loss of hollow bearing trees in addition to landscaping of the carpark areas, courtyards and accessible areas which surround the hospital. The landscape concept will suitably embellish the hospital and the broader rural setting. In order to ensure that the visual impacts of the hospital development when viewed from residential properties to the south-east is reduced, a condition has been recommended requiring the tree planting in the south-eastern corner of the site (including along Boundary Road) to be extended. This will also assist in reducing potential light spill from the use of hospital and carparking areas during the sensitive night time and evening hours.
- **Security:** A public submission has raised the issue of security to neighbouring premises and has questioned whether the fencing proposed will be sufficient to secure neighbouring properties. It is considered relevant that this matter be addressed as part of the future Stage 2 DA.

### Flight Path

The concept proposal includes the construction of a helipad in the north-east corner of the site, as illustrated in **Figure 8**. The stage 1 works will be limited to site works for the helipad only, with design and construction being deferred to Stage 2. The proponent has advised that the helipad is likely to have a low level of usage, with the number of movements expected to be between 5 to 10 on average per month. This estimate of usage has been based on current movements at both Bega and Pambula hospitals. The department notes that the Environmental Noise Assessment Report advises that there were only 14 arrivals to the Bega Emergency Department during the period of May 2011 to May 2012.



**Figure 8: Proposed Helicopter Flight Paths (source: BVN Architecture)**

The application is supported by a submission from Rehein Airport Consulting. The report advises that the *Draft Guidelines for Hospital and Helicopter Landing Sites in NSW* require surface level hospital landing sites to have at least two flight paths separated by 150 degrees and that flight paths should be orientated such that the usability factor is 95%. Rehein Airport Consulting has advised that the proposed design complies with this requirement and is in accordance with the draft NSW guidelines.

The department notes that the application has been referred to Air Services Australia, which has raised no objection to the proposal.