

Environmental Impact Statement

Eurobodalla Regional Hospital – SSD-56989722
Princes Highway, Moruya

Submitted to Department of Planning and Environment
On behalf of Health Infrastructure



'Gura Bulga'

Liz Belanjee Cameron

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

By using the green and blue colours to represent NSW, this painting unites the contrasting landscapes. The use of green symbolises tranquillity and health. The colour cyan, a greenish-blue, sparks feelings of calmness and reminds us of the importance of nature, while various shades of blue hues denote emotions of new beginnings and growth. The use of emerald green in this image speaks of place as a fluid moving topography of rhythmical connection, echoed by densely layered patterning and symbolic shapes which project the hypnotic vibrations of the earth, waterways and skies.

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

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

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

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17 July 2023

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EIS Declaration

Project details	
Project name	Eurobodalla Regional Hospital
Application number	SSD-56989722
Address of the Land in Respect of which the Application is Made	Lot 2 DP 1281576, Princes Highway, Moruya. Minor works occur on Lot 69 DP 752151 and the northern road reserve.
Applicant details	
Applicant name	Health Administration Corporation
Applicant address	1 Reserve Road, St Leonards, NSW 2065
Details of the person by whom this EIS was prepared	
Name	Chris Forrester
Professional Qualifications	Bachelor of City Planning Honours, UNSW (Class 1)
Address	173 Sussex Street, Sydney
Declaration by Registered Environmental Assessment Practitioner	
Name	Tim Ward
Registration Number	R80023
Organisation Registered with	Planning Institute of Australia
	The undersigned declares that this EIS: • has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	
Date	20/04/2023

Executive Summary

Purpose of this Report

This submission to the Department of Planning and Environment (DPE) comprises an Environmental Impact Statement (EIS) for a Development Application under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It relates to a new hospital at Princes Highway, Moruya (the project).

Development for the purposes of a hospital with a capital investment value (CIV) of more than \$30 million is identified in Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) as State Significant Development (SSD) for the purposes of the EP&A Act. A CIV Statement has been prepared by Genus Advisory confirms that the project has a CIV of more than \$30 million (provided under a separate cover) and the project is therefore SSD.

A request for the issue of Secretary's Environmental Assessment Requirements (SEARs) was sought on 30 March 2023. Accordingly, the SEARs were issued on 4 April 2023. This submission is in accordance with the DPE's guidelines for SSD applications lodged under Part 4 of the EP&A Act, and addresses the issues raised in the SEARs.

Project Overview

The State Significant Development Application (DA) seeks approval for the construction and operation of the Eurobodalla Regional Hospital, including:

- Site establishment and preparation, including bulk earthworks, tree removal, environmental clearing and cut and fill.
- Construction and operation of a three-storey hospital with four wings, which includes the following departments:
 - Emergency Department (including flexible mental health beds).
 - Medical Imaging.
 - Operating Theatres.
 - Intensive Care Unit.
 - Pathology.
 - Pharmacy.
 - Medical and surgical in-patient units.
 - Rehabilitation and Palliative Care in-patient units.
 - Women's Health and Paediatrics.
 - Ambulatory Care for community outpatient services.
 - Administration including Education and Training.
 - Front of House including Retail.
 - Back of House including Mortuary.
- Internal road network and access from Princes Highway.
- Secondary road access (controlled access for Emergency vehicles only) from Caswell Street to north of the project site.
- At grade car parking.
- Loading dock.
- Helipad.
- Ancillary landscaping including the Walawanni, Meeting Place and Healing Place.

Strategic Context

The project will deliver a state-of-the-art hospital facility that will create greater efficiencies, improve operations, and respond to existing capacity constraints and expected population growth in the Southern NSW Local Health District (SNSWLHD). This is directly consistent with the overarching themes and requirements of all relevant strategic plans, policies and guidelines, which include:

- NSW State Priorities.
- State Infrastructure Strategy 2018-2038 Building the Momentum.

- The South East and Tablelands Regional Plan 2036.
- Eurobodalla Local Strategic Planning Statement 2020-2040.
- Future Transport Strategy 2056 (and supporting documents).
- Draft Greener Places Design Guide.
- Crime Prevention through Environmental Design (CPTED) Principles.
- Better Placed: An integrated design policy for the built environment of New South Wales.
- Connecting with Country Draft Framework.
- NSW Flood Inquiry 2022.

Statutory Context

The development area is largely zoned R2 Low Density Residential. Under the State Environmental Planning Policy (Transport and Infrastructure) 2021, the R2 zone is identified as a prescribed zone, and any development for the purposes of a health services facility is permissible with consent within that zone. It is noted that a very small portion of the site (approximately 450m²) is zoned RU1 Primary Production. This is located on the western boundary of the site and no works are proposed in this location.

The project is generally consistent with the relevant planning controls that apply to the site, including all relevant SEPP's.

Engagement

Consultation has been undertaken with various stakeholders including:

- Government Architect NSW.
- Eurobodalla Shire Council.
- Transport for NSW.
- Local Aboriginal Community and Cobowra Local Aboriginal Land Council.
- Department of Planning and Environment.
- Heritage NSW.
- NBN Corporation.
- Essential Energy.
- Telstra.
- Environmental Protection Authority.
- Ambulance Service of NSW.
- Fire and Rescue NSW and the Rural Fire Service.
- State Emergency Services.

Key to the proposed development, a series of meetings and correspondence was undertaken with the various stakeholders to ensure the project adopted an appropriate, balanced outcome between the various site constraints and the needs of a hospital. This engagement was critical in the siting of the proposed hospital development and the helipad.

As well as this, consultation has also been undertaken with hospital patients, staff and visitors, local residents, community members and business owners and representatives of local Aboriginal and Torres Strait Islander community and stakeholder groups.

The key issues raised during the consultation process included Connecting with Country, traffic and parking, and noise. Aboriginal heritage, and bulk and scale. The outcomes of the consultation process have been considered in the design of the project.

Connecting With Country

The NSW Government Architect's Draft Connecting with Country framework has been utilised throughout the inception, design and delivery of this project. This includes:

- Identifying the Aboriginal knowledge holders early in the project to have comprehensive and meaningful influence.
- Including appropriate space and facilities for cultural proceedings as identified by the community.
- Creating an opportunity for outside interaction by both Aboriginal and non-Aboriginal people, to provide educational opportunities.
- Creating an ongoing line of communication to ensure that feedback is incorporated into the project.
- Incorporating traditional local land and water management techniques into design and the ecologically sustainable design of the project.

The project architects, Conrad Gargett, have partnered with cultural engagement organisation Yerrabingin to work with the local Aboriginal community and organisations to incorporate feedback throughout the project. Community consultation occurred both onsite and offsite, through design jams and presentations to relevant stakeholders. A Connecting with Country Working Group was also established, with members of the local Aboriginal community, the Local Health District and design team. A number of key themes were established as a result of this collaboration, including incorporating principles of Connecting to Country through the design and operational practices, as well as landscape and building elements.

Helipad

A helipad to service the new hospital is proposed to be located to the north of the main hospital building, in the north-east corner of the site. The location of this helipad underwent significant research and development to ascertain the best location to ensure it met the requirements of the hospital whilst also minimising impacts on surrounding sensitive receivers.

There are several critical safety and environmental considerations aviation experts must make when selecting a site for a helipad. The design and location of helipads must comply with Civil Aviation Safety Standards and recommended practices. They must avoid:

- Restricted airspace.
- High terrain on approach and departure paths.
- Vertical structures, obstacles and hazards, such as buildings, vegetation and mobile phone towers.

Further critical safety elements that influence the selection of helipad sites include:

- Alignment with direction of average, annual and prevailing winds.
- Avoidance of flying animals and bird colonies.
- Availability of emergency landing areas.

Other desirable factors consider how the helipad will affect amenity/quality of life. These include:

- Whether the siting of the helipad can avoid populous areas and areas sensitive to noise and vibration.
- Avoidance of ecologically and environmentally sustainable areas.
- Avoidance of culturally and spiritually sensitive areas.

With consideration of the site constraints, aviation requirements and feedback from consultation with Moruya Airport, Council and the Community, the Project Team (Aviation consultant and Architect) developed seven helipad options on the site for assessment.

Following the helipad option development, a Helipad Clinical Project Working Group was established with representation from Clinicians across the SNSWLHD, NSW Ambulance and Air Ambulance to assess each of the options from a clinical perspective. The assessment criteria for this included:

- A helipad that delivers a compliant on-grade solution to Australian Aviation Standards.
- That the helipad provides a direct access to the emergency department within 100m.
- The location minimises acoustic impacts to existing residences.
- The location minimises acoustic impacts to patient amenity/rooms.

- The location minimises operational impacts (i.e. closure of access roads, paths and carparking).
- The location aligns with site masterplan including future development ones, Connecting with Country principles, visual impact and ecological zones.

Two meetings were also held with the Helipad Clinical Project Working Group to evaluate each of the options and determine the preferred helipad option to the north of the main hospital building.

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the environmental impacts of the project in accordance with the SEARs and sets out the undertakings made by Health Infrastructure NSW to manage and minimise potential impacts arising from the development.

Noise and vibration impacts during the construction works will require specific management and mitigation, including limiting the use of heavy plant and equipment within proximity to sensitive receivers and implementing respite periods where construction activities exceed the relevant noise levels. Impacts related to traffic and waste management also have the potential to arise during construction, however, they will be suitably mitigated through the implementation of a detailed Construction Management Plan (and supporting documentation) that will be prepared by the Principal Contractor prior to the commencement of works. As necessary, this documentation will be continually reviewed and updated throughout the construction phase to accommodate for the construction works and hospital management requirements. Overall, it is noted that the impacts of construction will be temporary and discontinuous. Any impacts will be suitably mitigated to minimise the impact to the surrounding community.

During operation, the impacts of the project will include bulk, scale, and visual amenity impacts resulting from the proposed built form. These will be addressed through modulation, articulation and landscaping. The project adequately seeks to avoid impacts to biodiversity through the provision of 8,458m² new tree canopy and the implementation of a sympathetic bushfire asset protection zone. Similarly, the project will minimise any impact to Aboriginal heritage through the ongoing protection of scarred trees and the archaeological salvage of significant sites in consultation with key Aboriginal stakeholders. Overall, the potential impacts to arise as a result of the project are considered acceptable given the needs of a major hospital. Once operational, the development of Eurobodalla Regional Hospital will generate significant long-term positive benefits including a wide range of improvements to health and clinical services and opportunities for job growth.

Conclusion and Justification

The EIS addresses the SEARs, and the project establishes a new hospital at Princes Highway, Moruya. The potential impacts of the development are acceptable and are able to be managed. Having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The project will facilitate the development of a new state-of-the-art health facility which will further support and strengthen the services and facilities provided within the SNSWLHD.
- The project represents a significant investment in the Eurobodalla region, which will deliver approximately 306 direct jobs during the construction phase and 518 operational jobs at the time of opening.
- The development will support a significant piece of social infrastructure, increasing the number of hospital beds and health workers to Moruya.
- The site allows for the provision of new health facilities that meet the special design requirements for the future proposed uses, whilst not resulting in impacts on surrounding uses that cannot be managed.
- The project will facilitate health uses on the site and is entirely consistent with the NSW State Priorities and relevant strategic planning objectives by providing opportunities for future precinct activation and increased and improved health facilities.
- The project will facilitate the delivery of new landscaped areas and tree planting, as well as retention of trees which have been identified as having Aboriginal significance.
- The assessment of the project has demonstrated that the development will not result in any environmental impacts that cannot be appropriately managed and consistent with the relevant planning controls for the site.
- The project is consistent with the principles of ecological sustainable development as defined by clause 193 of the Environmental Planning and Assessment Regulation 2021.

Given the planning merits of the project, the proposed development warrants approval by the Minister for Planning.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of Health Infrastructure NSW (HI), in support of a State Significant Development (SSD) Application for a new hospital at Princes Highway, Moruya (the Site).

The project is SSD under Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), as it is development for the purpose of a hospital with a capital investment value of more than \$30 million.

The report is based on the Architectural Plans provided by Conrad Gargett (see **Appendix D**) and other supporting technical information appended to the report (see Table of Contents).

This EIS has been prepared in accordance with the requirements of:

- Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).
- Clause 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation).
- The Secretary’s Environmental Assessment Requirements (SEARs) for the preparation of the EIS.
- The State Significant Development Guidelines – Preparing an Environmental Impact Statement.

Appendix A provides a SEARs compliance table that shows where the SEARs have been addressed in this EIS. **Appendix B** outlines the mitigation measures that will be implemented during the construction and operational phases of the project. **Appendix C** provides a statutory compliance table that identifies where the relevant legislation has been addressed in this EIS.

This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report. The EIS intends to inform the community and stakeholders about the project, including its social, economic and environmental impacts, mitigation measures and benefits.

1.1 The Applicant

The Applicant’s details are presented in **Table 1** below.

Table 1 Applicant Details

Applicant: Health Administration Corporation	
Address:	1 Reserve Road, St Leonards
ABN:	89 600 377 397

1.2 Overview of the Proposed Development

The project seeks development consent under ‘Division 4.7 - Stage Significant Development’ of the EP&A Act for the construction and operation of the Eurobodalla Regional Hospital, including:

- Site establishment and preparation, including bulk earthworks, tree removal, environmental clearing and cut and fill.
- Construction and operation of a three-storey hospital with four wings, which includes the following departments:
 - Emergency Department (including flexible mental health beds).
 - Medical Imaging.
 - Operating Theatres.
 - Intensive Care Unit.
 - Pathology.
 - Pharmacy.
 - Medical and surgical in-patient units.
 - Rehabilitation and Palliative Care in-patient units.
 - Women’s Health and Paediatrics.
 - Ambulatory Care for community outpatient services.

- Administration including Education and Training.
- Front of House including Retail.
- Back of House including Mortuary.
- Internal road network and access from Princes Highway.
- Secondary road access (controlled access for Emergency vehicles only) from Caswell Street to north of the project site.
- At grade car parking.
- Loading dock.
- Helipad.
- Ancillary landscaping including the Walawanni, Meeting Place and Healing Place.

1.3 Site Overview

The site for the Eurobodalla Hospital is located within the southern NSW coastal town of Moruya, located within the Eurobodalla Shire Local Government Area. The site is approximately two kilometres south east of the Moruya town centre, approximately 140 kilometres south of Nowra and 300 kilometres south of Sydney. The proposed locational context of the hospital campus is shown at **Figure 1**.

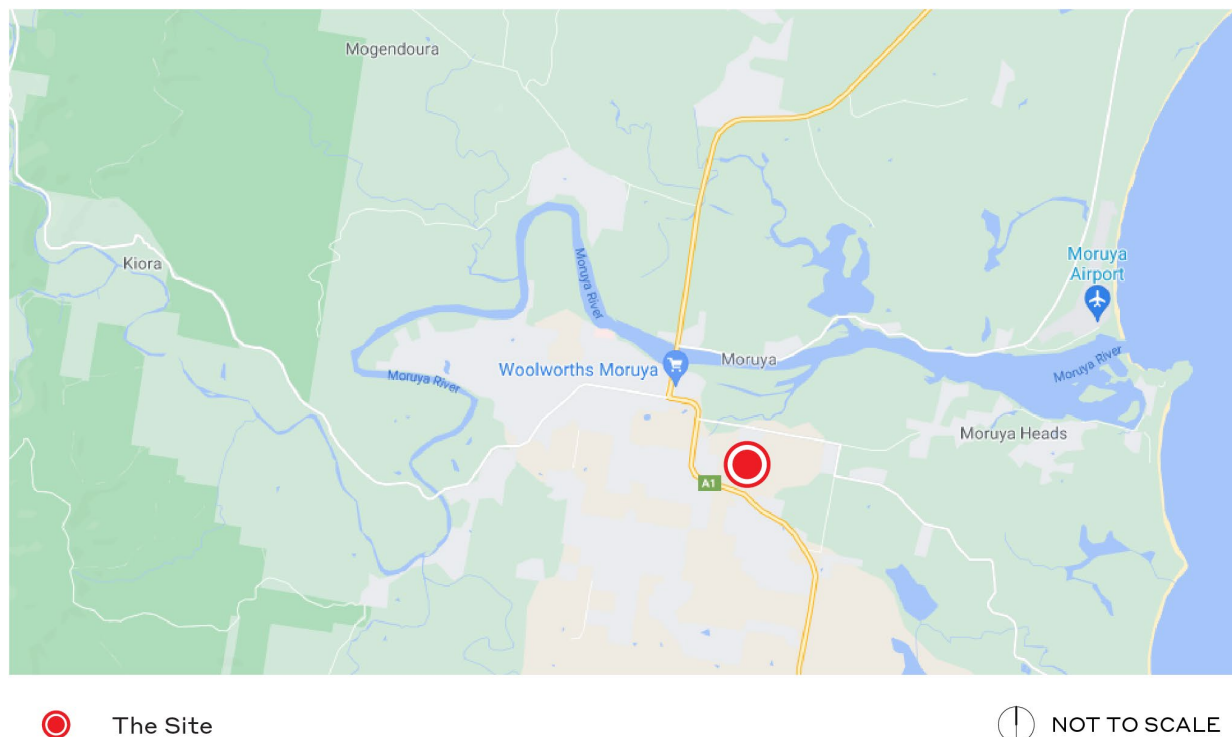


Figure 1 Locational Context
Source: Nearmap & Ethos Urban

1.4 Objectives of the Development

The overall objective of the project is to develop a new hospital for the Eurobodalla region, combining the services of two existing hospitals within the Southern NSW Local Health District (SNSWLHD). It is intended that this development will, in turn enhance:

- Access to health services for patients, carers and staff enabled by service integration to one site.
- Current and future growth of acute services for the Eurobodalla community.
- Aboriginal health outcomes by designing a facility which meets the needs of local Aboriginal communities using Connecting with Country initiatives.
- Patient and staff safety by delivering fit for purpose infrastructure to enable new models of care.
- Staff satisfaction in an environment that is supportive and stimulating.
- Asset resilience by designing for climate adaptation.

- Ecologically sustainable design outcomes by enabling improvements in energy efficiency to reduce emissions and contribute to net carbon zero.
- Minimise disruption and maintain business continuity.
- Ensure all environmental impacts are appropriately avoided, minimised or offset by way of the project design or by suitable implementation of the mitigation measures (**Appendix B**).

1.5 Background to the Development

The SNSWLHD currently provides health services across three campuses within the Eurobodalla Shire, servicing a population of approximately 38,000 people. The SNSWLHD has identified a need to consolidate existing services to reduce duplication and increase the provision of care to meet the needs of the Eurobodalla population.

In order to meet the health needs identified by the SNSWLHD, the Eurobodalla Regional Hospital will:

- Increase the complexity of services that can be provided locally and move from providing services at Level 3 hospital role delineation to providing most services at Level 4 (as per NSW Health *Guide to the Role Delineation of Clinical Services*).
- Future services will not be duplicated but rather provided across one main campus with networked outreach programs to support peripheral communities.
- The service of the future will bring together multidisciplinary teams to provides services for the patient when and where they need it and optimise resources.
- Deliver new care streams with new models of care which do not operate in isolation.
- Deliver an integrated service where a patient will move seamlessly between services and streams as required which will support older people within each stream.

1.6 Other Approvals

A range of separate works are occurring at the site under separate applications via Part 5 of the EP&A Act and as Development Without Consent under *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP). The works would be required to support the future development of the site (for any purpose) and have also been designed to accommodate the future needs of the Eurobodalla Regional Hospital development. Specifically, the works involve:

- New Roundabout Works:
 - Construction of a single lane roundabout at the site entrance to allow for one lane of traffic in each direction to pass along the Princes Highway.
 - Ancillary electricity reticulation and street lighting.
 - Tree removal and replacement.
- Soil Conservation Works:
 - Construction of three erosion and sediment basins to facilitate the ongoing management of the greenfield lot until such time as its developed.
 - Construction of an ancillary road into the site off the Princes Highway to facilitate construction access into the site for the soil conservation works.

As part of the REF works, consultation was undertaken with Eurobodalla Shire Council and all feedback received was incorporated into the project design. At the time of preparing this SSDA, the REF works have been approved by HI and construction has commenced.

We note that an Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared as part of the Soil Conservation REF. The ACHAR recommended that Aboriginal archaeological salvage be undertaken prior to the commencement of the soil conservation works. The archaeological salvage will be undertaken in consultation with the Registered Aboriginal Parties and will be undertaken prior to the SSDA approval.

2.0 Strategic Context

This chapter identifies the key issues that are relevant to the project's strategic context and provides a justification for the project in light of this context. The chapter also provides an analysis of alternatives that were considered as part of the scoping process.

2.1 Site Context

The Eurobodalla Hospital site is located at Princes Highway, Moruya. The site is legally described as Lot 2, DP 1281576 and is owned by the Health Administration Corporation. The site has an approximate area of 21.94 hectares and currently comprises vacant greenfield land. An aerial photograph of the site is shown at **Figure 2**.



Figure 2 Aerial Photograph

Source: Nearmap & Ethos Urban

In addition to the main hospital site, minor works are also proposed on adjacent land, being Lot 69 DP 752151 and the road reserve to the north of the site. Further discussion is provided in **Section 3.3.3** and consent for carrying out these works has been granted by way of Clause 23 of the EP&A Regulation.

2.2 Key Features of Site and Surrounds

2.2.1 Topography and Vegetation

The proposed hospital site is a large, vacant allotment. A large portion of the site is cleared for historic grazing purposes, with some existing natural vegetation on the sloping portion to the south-east of the site.

The topography of the site extends from the lowest point of approximately RL 1.5 at the north west up to approximately RL 55 at the south east of the site. Whilst the site is large, this constitutes a total change in level of more than 50 metres. The area identified as usable and appropriate for development is towards the north-east corner of the site.

A significant gully feature extends from east to west on the site and acts as a natural watercourse through the site. The high point is at the base of the south-east ridge at RL 19 and the gully extends west into a flood zone. The low point of the gully on the western boundary is approximately RL 2.0 (see **Figure 3**).

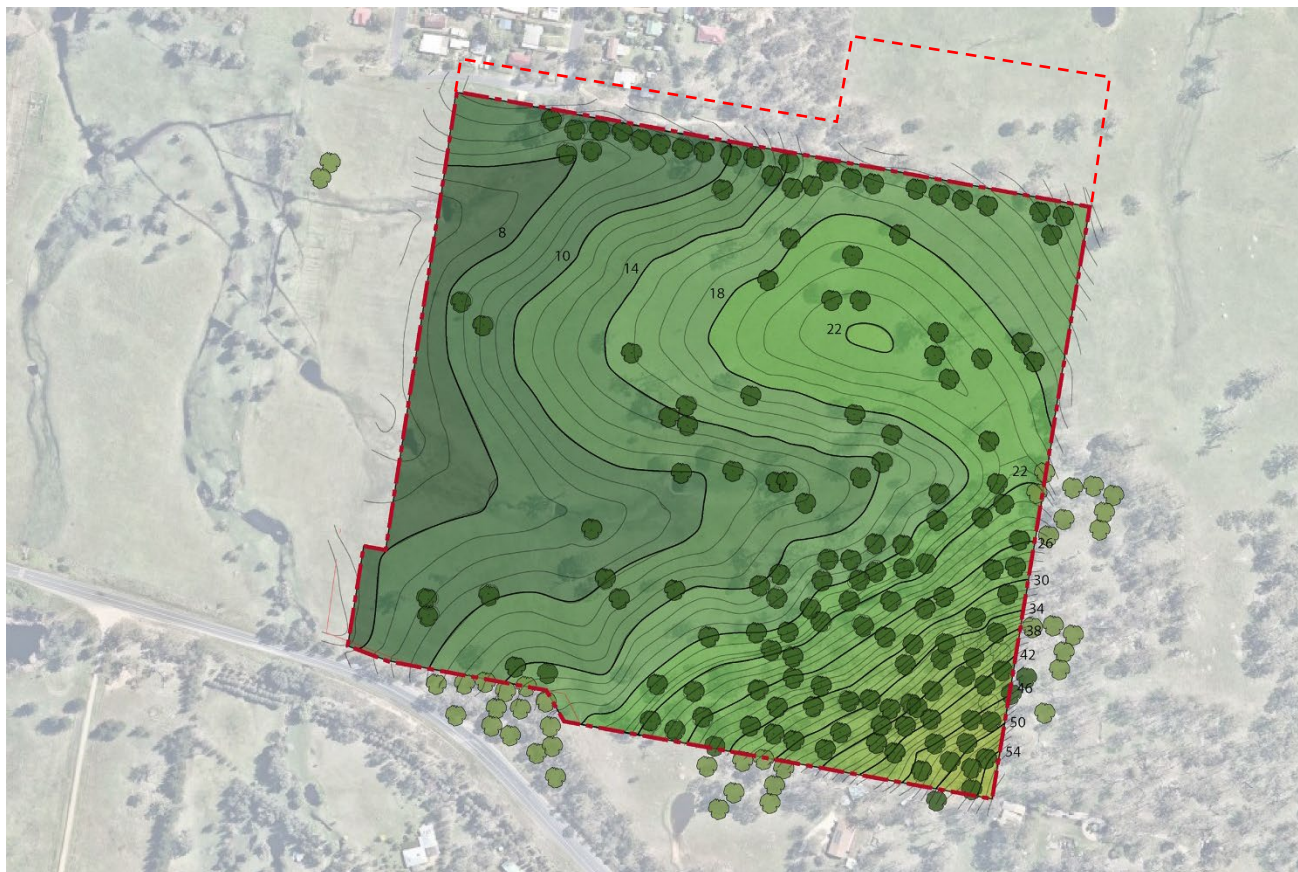


Figure 3 Topography of the site

Source: Conrad Gargett

2.2.2 Bushfire

The site is mapped as being within a designated bushfire prone area by the NSW Rural Fire Service. Notwithstanding this, the overall risk of a bushfire on site is considered to be low.

2.2.3 Contamination

The site has historically been used for agricultural purposes since at least 1961. A Detailed Site Investigation (**Appendix M**) has confirmed the presence of polycyclic aromatic hydrocarbons (PAHs) on site.

2.2.4 Geotechnical Conditions

Based on the results of site investigations, the ground conditions on the majority of the site comprises topsoil and residual clay overlying shallow weathered granite bedrock. Bedrock levels vary throughout the site between 1.8m and 20.15m below surface level. Groundwater was encountered during the borehole investigations, with observations made between 2.6m and 15.2m below surface level.

2.2.5 Flooding

The site is located largely outside of Moruya's known flood area, with only a small portion western edge of the site identified on the Probable Maximum Flood (PMF) plan. The flood impact of the site is shown at **Figure 4**.

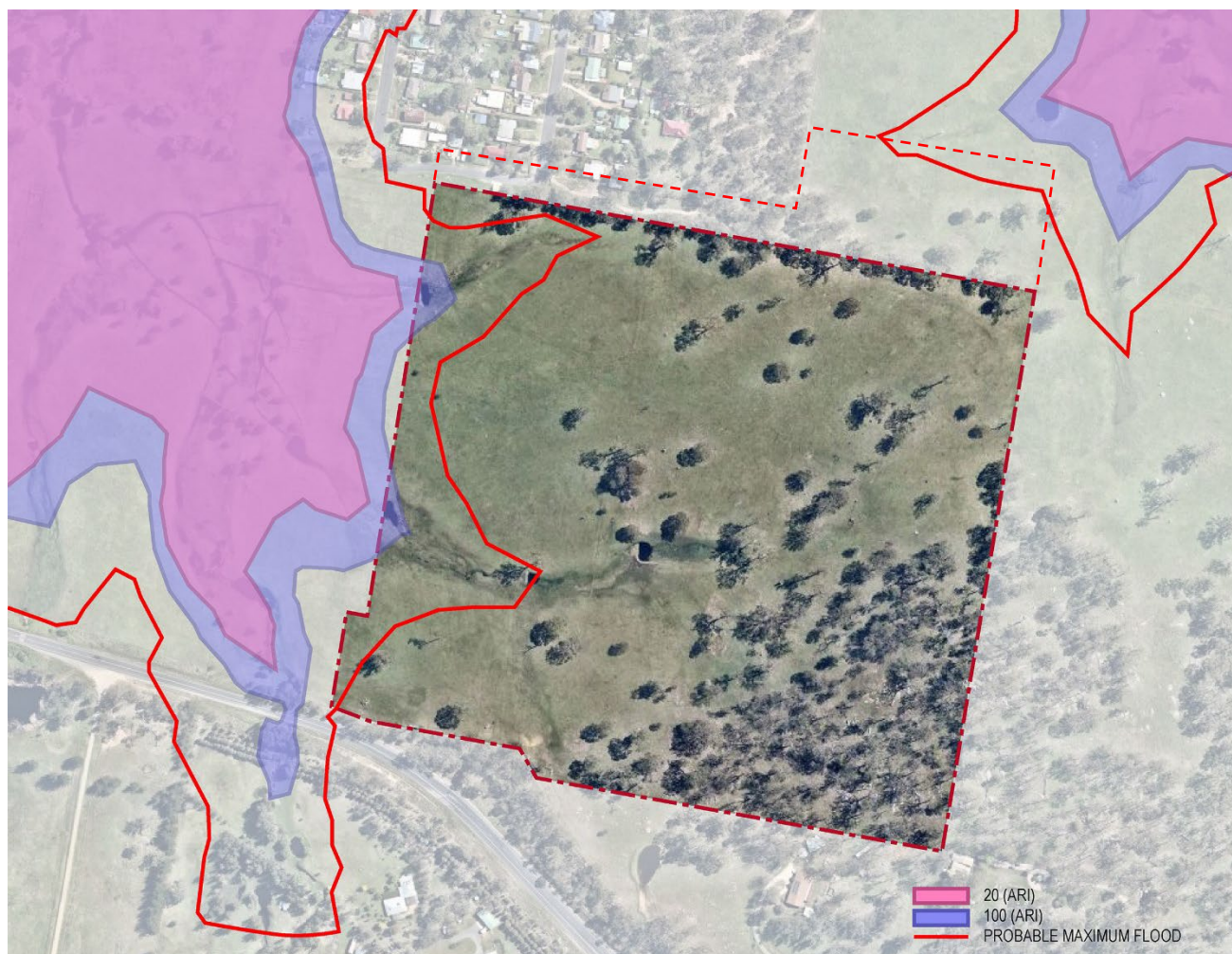


Figure 4 Flood Impact

Source: Conrad Gargett

2.2.6 Transport and Access

Vehicle Access and Parking

Informal access to the site is provided via both Albert Street and the Princes Highway via locked metal gates. No car parking is provided on site, given that it currently comprises a greenfield site.

Active Transport

There are no active transport facilities directly surrounding the site. Notwithstanding this, there are several active transport facilities within the vicinity of the site. To the north, a pedestrian footpath services the local residential streets and connects with the pedestrian spine on South Head Road which connects to the Moruya Town Centre. To the east, the TAFE NSW campus is serviced by a 3.0m wide shared path which connects to the Moruya Town Centre. A number of future shared and pedestrian paths are also proposed under the Eurobodalla Pathways Strategy.

Public Transport

The site currently comprises a greenfield site and, therefore, is not supported by any existing public transport services. A bus stop is located at the adjacent TAFE NSW campus, servicing the 860 route, travelling between Moruya and Batemans Bay.

2.2.7 Surrounding Development

The site is surrounded by the following development:

- To the north of the site is a low density residential subdivision called Mynora Estate. Beyond this is agricultural, greenfield land and the Moruya River.
- Moruya Town Centre is located approximately 1.5km northwest of the site. It comprises a series of retail stores, commercial office space, community facilities and recreational spaces. The Princes Highway is the main thoroughfare that runs through the Moruya Town Centre.
- To the south of the site is the Princes Highway, which is a classified road that runs all the way down the eastern coast of NSW from the south of Sydney. Further agricultural and greenfield land is also located to the south.
- To the east of the site is greenfield and agricultural land, extending between the site and the coastline, with a mixture of sparse and dense bushland.
- Directly to the west of the site is agricultural land and the Moruya TAFE campus which contains a number of buildings and at grade car parking.
- To the west and northwest of the site is the agricultural land and the Moruya TAFE, which contains low density residential housing, the Moruya Showground and various retail and service tenancies.

Photographs of the site and the surrounding development is shown in **Figure 5** to **Figure 10** below.



Figure 5 The site, viewed from the south (Pacific Highway Entrance) looking north

Source: Ethos Urban



Figure 6 The site, viewed from the north of the site, looking south west

Source: Ethos Urban



Figure 7 Residential development located to the north of the site

Source: Ethos Urban



Figure 8 Princes Highway located to the south of the site, looking west

Source: Ethos Urban



Figure 9 Moruya TAFE campus located to the west of the site

Source: Google Maps



Figure 10 Moruya Town Centre located further northwest of the site

Source: Google Maps

2.3 Strategic Planning Context

Table 2 below summaries the project's strategic context as established by Government plans, policies and guidelines relevant to the project.

Table 2 Summary of Consistency with Relevant Strategies, Policies and Guidelines

Instrument/Strategy	Comments
NSW State Priorities	The NSW State Priorities are twelve high-level priorities for the State, being: • Creating jobs. • Delivering infrastructure. • Driving public sector diversity. • Improving education results. • Improving government services. • Improving service levels for hospitals. • Keeping our environment clean. • Making houses more affordable. • Protecting our kids. • Reducing domestic violence reoffending. • Reducing youth homelessness. • Tackling childhood obesity. The project seeks to provide a new Role Delineation 4 Hospital to improve service levels for health purposes. The project will therefore meet a number of the key NSW priorities, whilst also creating jobs and delivering infrastructure on the South Coast of NSW.
State Infrastructure Strategy 2018-2038 Building the Momentum	The project is consistent with the State Infrastructure Strategy by: • Delivering hospital infrastructure to respond to existing capacity constraints and expected population growth (of which is expected to grow by more than 500 people by 2031). • Providing state of the art facilities to create greater efficiencies and improved operation. • Planning for the future health care needs of the region through potential for future expansion. Importantly, the project forms part of a coordinated investment in the development of Eurobodalla Hospital to support population growth and change.
The South East and Tablelands Regional Plan 2036	The South East and Tablelands Regional Plan 2036 covers the greater south coast area from the Illawarra in the north to the Victorian border in the south. The plan identifies four key goals to deliver under this plan, including providing a connected and prosperous economy, protecting a diverse environment interconnected by biodiversity corridors, foster healthy and connected communities and provide ecologically sustainable housing choices.

	Direction 21 of the plan seeks to “increase access to health and education services”. This project is consistent with this direction as it seeks to deliver state of the art health facilities in a central location, servicing surrounding areas of Moruya, Batemans Bay and Eurobodalla. The development will also strengthen the regional economy in providing jobs and employment within the south coast region and protecting biodiversity lands within the site by identifying future expansion zones in suitable locations.	
Eurobodalla Local Strategic Planning Statement	The Eurobodalla Local Planning Strategy (LSPS) was prepared to guide Council's land use planning for the next 20 years, implement priorities from Council adopted strategies and give effect to State Government strategic directions for the LGA. The LSPS identifies that there are a number of major infrastructure projects occurring or planned to occur within the LGA, including the construction of the Moruya bypass and the hospital proposed in this application. In particular, this project is consistent with planning priority 7 of the LSPS, “<i>Collaborate with NSW government in delivering strategic infrastructure projects</i>”. This project will deliver a hospital in conjunction and collaboration with Eurobodalla Shire Council and establish a framework for the delivery of future health services at the site, as required.	
Government Architect’s Connecting with Country Framework	The Connecting to Country Framework acts as a guide for developing connections with Country to inform the planning, design, and delivery of built environment projects in NSW. Cultural consultants, Yerrabingin, have been appointed to ensure the Eurobodalla Regional Hospital will seek to celebrate and acknowledge the Aboriginal significance of the site. Connection to Country will be incorporated throughout the lifecycle of the project and has formed part of the State Design Review Panel process. Further detail is provided in Section 3.2.	
Future Transport Strategy 2056 (and supporting documents)	The Future Transport Strategy 2056 sets the 40-year vision, directions and outcomes framework for customer mobility in NSW, which will guide future transport investment over the long term. The supporting plans provide further detail on customer outcomes or place-based planning documents to guide the Strategy's implementation. The project includes an internal road system to support the hospital, that will incorporate sufficient accessibility into the hospital from the Princes Highway and within the hospital campus itself. This road network is accompanied by pedestrian pathways across the site, facilitating and encouraging safe and convenient access for all across the site.	
Draft Greener Places Design Guide	The draft Greener Places Design Guide has been prepared by the GANSW to guide the design, planning and delivery of green infrastructure across NSW. The aim is to create healthier and more liveable cities and towns by improving community access to recreation and exercise, walking and cycling connections and the resilience of urban areas. The proposed development directly aligns with the aims of the draft Greener Places Design Guide through the introduction of new green space and recreation in conjunction with the hospital to create a healthier urban environment. It also aims to establish improved vehicular, pedestrian and cycling connections to and from the hospital campus. Further detail is provided below and in the Design Report prepared by Conrad Gargett at Appendix D.	
	Guiding principle 1 – Connectivity	The proposed development seeks to provide safe and comfortable connections through the site by offering new open spaces with passive surveillance and activated uses.
	Guiding principle 2 – Participation	The provision of new open spaces allows for the ability to hold events that encourage varied programming and use of open space.
	Guiding principle 3 – Integration	The site's greenfield location has been incorporated into the landscape design, including native planting, biophilic design principles, opportunity for water sensitive urban design, bioretention basins and endemic tree species.

	<i>Guiding principle 4 – Multi-functionality</i>	The proposed open spaces allow for varied uses, including use by individuals and small groups, as well as larger events and passive recreation. These open spaces will also provide visual amenity from within the hospital.
Crime Prevention through Environmental Design (CPTED) Principles	Refer to Section 6.12 and the CPTED Assessment Report at Appendix Y .	
Better Placed: An integrated design policy for the built environment of New South Wales.	The Better Placed Policy includes seven key objectives in the design of the built environment prepared by the Government Architect. A review of the project's consistency with the principles of Better Placed is provided below.	
	<i>Objective 1</i> Better Fit – contextual, local and of its place	The proposed development responds to the surrounding context and its location. It will provide a new hospital at an appropriate scale, responding to the existing built form and its local context. The new built form has been designed to consolidate existing health services within the SNSWLHD to improve efficiencies and design principles are established to guide the development of future expansion zones
	<i>Objective 2</i> Better Performance – sustainable, adaptable and durable	Health Infrastructure has taken a responsible approach to ensuring the principles of ESD are incorporated into the project, ensuring effective and environmentally responsive ESD initiatives. Further discussion is provided in Section 6.16 .
	<i>Objective 3</i> Better for Community – inclusive, connected and diverse	The proposed development incorporates accessible access to cater to the varying needs of the public who will use the facilities. The hospital will offer improved services and capacity to support the needs of the district. The accessibility of the project is discussed further at Section 6.22 .
	<i>Objective 4</i> Better for People – safe, comfortable and liveable	The proposed development has sought to balance the operational needs of the hospital while providing a fit for purpose building that incorporates high quality design features to make patients and staff feel comfortable. The proposed development will also include secured open space and outdoor seating areas, to enhance passive surveillance to public and private areas. The CPTED principles are discussed in Section 6.12 .
	<i>Objective 5</i> Better Working – functional, efficient and fit for purpose	The proposed development seeks to provide a hospital campus on an existing greenfield site. It will provide a facility that improves the operational efficiency of the SNSWLHD and meets the health care needs of the growing population. The design of the hospital seeks to accommodate efficient team and services flow, with easy and efficient navigation, and provide spatial planning that supports standardisation of clinical areas.
	<i>Objective 6</i> Better Value – creating and adding value	The proposed development will cater for the increased health demands of the community, whilst meeting the NSW Government's budget for the works. This includes providing for the immediate health needs of the community via the works, whilst establishing a framework for future expansion of services into the future.
	<i>Objective 7</i> Better Look and Feel – engaging, inviting and attractive	These design principles have informed the proposed development and are illustrated in the Design Report prepared by Conrad Gargett and included at Appendix D . A discussion of the principles guiding this development is also provided at Section 3.1.1 .
NSW Flood Inquiry 2022	In March 2022, the NSW Government commissioned an independent expert inquiry into the preparation for, causes of, response to and recovery from the 2022 catastrophic flood event	

	across the state of NSW. The Inquiry makes 28 recommendations for change, which are intended to provide practical, proactive and sustained mechanisms to ensure readiness for and resilience to flooding. In particular, recommendation 28 aims to “minimise disruption to medical services, aged care services and the police, Government ensure hospitals, medical centres, nursing homes, aged care facilities and police stations are situated above the probable maximum flood level”. Bonacci have considered these recommendations and incorporated them into the building design as required. In particular, the lowest proposed hospital floor level is RL 13.80 which is well above the PMF level of RL 8.97. This would also allow for a shelter in place approach to be implemented in the event of a flood. Further detail is provided at Appendix F.
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2.4 Cumulative Impacts

The Eurobodalla Regional Hospital will deliver significant benefit to the community and is not expected to give rise to any unacceptable environmental impacts that cannot be appropriately managed. The project is not located in the vicinity of any other significant developments that are planned or are currently being undertaken. The project is considered to have positive impacts in the long-term, in making more efficient use of the existing greenfield site to provide health care services that cater to the needs of the region. Overall, the impacts to the surrounding region are expected to be relatively minimal and short-lived. Mitigation measures are proposed at **Appendix B** to ensure any long-term impacts are minimised and are reasonable in the context of providing necessary health services to the community.

2.4.1 Moruya Bypass Upgrade

The Moruya Bypass Upgrade is a Transport for NSW project which aims to divert the Princes Highway to the east of Moruya, between Jervis Bay Road and the Victorian border, before re-joining the existing highway. The bypass is expected to drastically reduce road traffic volumes on the portion of the Princes Highway which fronts the site but will increase the number of trips approaching from the east, when compared to the existing travel patterns past the site.

The Moruya Bypass is still in the options analysis phase and the exact alignment and timing of the project are yet to be confirmed. Notwithstanding this, the Moruya Bypass Upgrade is not anticipated to have any impact on the construction works for the Eurobodalla Regional Hospital.

2.5 Project Contributions and Agreements

The relevant contributions plan is the *Eurobodalla Section 7.12 Contributions Plan 2022* (Contributions Plan). The purpose of the Contributions Plan is to enable Council to require a contribution towards the provision, extension or augmentation of public amenities and services that will or are likely to be required as a consequence of development within the LGA.

Under Section 1.4 of the Contributions Plan, Council does not impose a contribution on any development exempted from section 7.12 levies by way of a direction made by the Minister for Planning. Accordingly, a levy is not required to be paid for the proposed development in accordance with Circular D6 as discussed below.

Circular D6 – Crown Development Application and Conditions of Consent

Exemption from contributions is supported by Planning Circular (Circular C6) relating to Crown Development Applications issued by the then Department of Urban Affairs and Planning. Circular D6 sets out the circumstances in which it is appropriate for a consent authority to seek the approval of the applicant or the Minister to impose conditions of consent. Circular D6 notes that where a consent authority intends to levy contributions on Crown Development, they must be justified and consideration should be given to the Crown’s role in providing a community service, the cost of which is accountable to all taxpayers in the State.

The currency of Circular D6 is confirmed in the Draft Development Contributions Practice Note – July 2005, which states “the current limitation on imposition of levies on Crown Developments as outlined in Circulate D6...remain in force.” HI is a State Government agency which relies on public funding to provide new facilities for the local community and the

policy seeks to ensure this funding directly contributes to its intended goal of improving health outcomes for the community.

Accordingly, no development contribution is required to be paid for the development. However, as a result of ongoing consultation with Eurobodalla Council, HI will pay a contribution for a new sewerage pump, discussed below.

2.5.1 Sewer Pump Contribution

Eurobodalla Shire Council is seeking to undertake the construction of a sewage pumping station and associated infrastructure to service a number of existing and planned developments within Moruya. Given that the proposed hospital will require a new sewage pumping station and sewer rising main, Council has sought a cash contribution from HI to assist with the delivery of this infrastructure.

The total estimated cost of detailed design, procurement, construction and project management is \$3.4 million. Using a cost sharing formula based on proportional loadings, HI's contribution would be approximately \$1.9 million. HI have agreed to this contribution in principle and are currently drafting a formal agreement with Council for its delivery.

2.6 Project Justification

The project is consistent with the overarching objectives of the relevant strategic plans, policies and guidelines. It provides for the construction of a new hospital to accommodate demand and to improve efficiency within the SNSWLHD. The potential impacts of the development are acceptable and are able to be managed. The project will incorporate measures to protect Aboriginal and archaeological heritage and will minimise the acoustic impacts associated with the operation of the hospital and helipad.

The proposed development will provide facilitates and services in line with the modern standards of care. The project will reduce pressure on existing health services in the Eurobodalla Shire and within the wider SNSWLHD. Overall, the project will provide an efficient work environment for staff and a high standard of amenity for patients and visitors.

2.7 Analysis of Alternatives

Six options were identified to respond to the service needs identified in the Clinical Services Plan for the Eurobodalla Hospital. The options are considered in **Table 3** below.

Table 3 Analysis of alternatives

Description	
Option 1 – Keep Safe and Operational Retain existing facilities in Moruya and Batemans Bay with service upgrades and maintenance works as required. No physical changes to existing hospital infrastructure. Option includes urgent works at Moruya Emergency Department and Close Observation Units.	Options 1 to 3 were discounted by hospital stakeholders and the NSW Government due to their inability to deliver project benefits and a service which will meet the needs of the community.
Option 2 – Local Partnerships Assess local partnership opportunities with local non-government healthcare providers to assist meeting the needs of the service such as a private hospital provider.	
Option 3 – Public Private Partnership Assess a public-private partnership with the private sector to meet the needs of the service.	
Option 4 – Batemans Bay and Moruya Hospital Redevelopment Upgrade and extend existing facilities in Batemans Bay and Moruya to meet the needs of the service.	Option 4 was not selected given that upgrades to existing facilities would lead to insufficient outcomes and a lack of service integration, that is inconsistent with the overarching aims of this project.
Option 5 – Moruya Hospital Redevelopment	

Upgrade and extend existing facility at Moruya Hospital to meet the needs of the service in a complex brownfield redevelopment. This option includes the closure of Batemans Bay Hospital and the urgent upgrade to Moruya Emergency Department and Close Observation Unit.	Capital investment Options 5 and 6 were shortlisted and explored further. Option 5 was ultimately discounted as the redevelopment of Moruya Hospital would be unable to delivery contemporary best-practice models of care (including achieving a growth in services and space for new treatment/therapeutic technologies) without significant upgrades that would cause undesirable disruptions to the existing operational hospital campus. Therefore, Option 6 was selected as the preferred option.
Option 6 – Greenfield Hospital Development Undertake a site selection process to acquire a new site and deliver a service configuration to meet the needs of the service. Option includes the closure of Batemans Bay Hospital, Moruya Hospital, includes urgent upgrade to Moruya Emergency Department and Close Observation Unit until the new facility is commissioned and operational.	

2.7.1 Option 6 – The Project

The project comprises the development of the Eurobodalla Regional Hospital, as described in **Section 3.0** of this report. The proposed built form responds to the existing site context and is consistent with the established Design Principles (see **Section 3.1.1**). The project will facilitate the efficient construction of a high quality design that responds to the strategic need identified above. Importantly, the project supports the growth and expansion of the SNSWLHD in line with NSW Health and NSW State Government budget allocation.

The project is the result of extensive design analysis undertaken by Conrad Gargett and the consultant team, aimed at achieving an optimum urban design outcome for the proposed hospital campus and its local context. Specifically, the built form will be located in a portion of the site that is unconstrained by any environmental impacts or hazards, while also meeting the needs of a hospital development. The siting of the project achieves primary vehicle access from the Princes Highway and secondary access from the north and provides an opportunity for future expansion (to be carried out through separate planning applications as required).

2.7.2 Helipad Options Analysis

A helipad is proposed to be constructed adjacent to the northern boundary of the site. This location was chosen following extensive consultation with relevant stakeholders and is based on prevailing wind conditions and its proximity to clinical services. The location of the helipad will also avoid key site constraints such as topography, flooding, bushfire, ecology and adjacent residential dwellings.

There are several critical safety and environmental considerations aviation experts must make when selecting a site for a helipad. The design and location of helipads must comply with Civil Aviation Safety Standards and Recommended Practices. They must avoid:

- Restricted airspace.
- High terrain on approach and departure paths.
- Vertical structures, obstacles and hazards, such as buildings and mobile phone towers.

Further critical safety elements that influence the selection of helipad sites include:

- Alignment with direction of average, annual and prevailing winds.
- Avoidance of flying animals and bird colonies.
- Availability of emergency landing areas.

Other desirable factors consider how the helipad will affect amenity/quality of life. These include:

- Whether the siting of the helipad can avoid populous areas and areas sensitive to noise and vibration.
- Avoidance of ecologically and environmentally sustainable areas.
- Avoidance of culturally and spiritually sensitive areas.

With consideration of the site constraints, aviation requirements and feedback from consultation with Moruya airport, Council and the Community, the Project Team (Aviation consultant and Architect) developed seven helipad options on the site for assessment.

Following the helipad option development, a Helipad Clinical Project Working Group was established with representation from Clinicians across the SNSWLHD, NSW Ambulance and Air Ambulance to assess each of the options from a clinical perspective.

The assessment criteria for this included:

- A helipad that delivers a compliant on-grade solution to Australian Aviation Standards.
- That the helipad provides a direct access to the emergency department within 100m.
- The location minimises acoustic impacts to existing residences.
- The location minimises acoustic impacts to patient amenity/rooms.
- The location minimises operational impacts (i.e. closure of access roads, paths and carparking).
- The location aligns with site masterplan including future development ones, Connecting with Country principles, visual impact and ecological zones.

Two meetings were held with the Helipad Clinical Project Working Group to evaluate each of the options and determine the preferred helipad option. Further detail regarding the helipad is provided in the Aviation Report at

Appendix G.

3.0 Project Description

This chapter describes the proposed development, including the project's disturbance area, conceptual layout and design, main uses and activities and staging.

3.1 Project Overview

The project seeks development consent under 'Division 4.7 - Stage Significant Development' of the EP&A Act for the construction and operation of the Eurobodalla Regional Hospital, including:

- Site establishment and preparation, including bulk earthworks, tree removal, environmental clearing and cut and fill.
- Construction and operation of a three-storey hospital with four wings, which includes the following departments:
 - Emergency Department (including flexible mental health beds).
 - Medical Imaging.
 - Operating Theatres.
 - Intensive Care Unit.
 - Pathology.
 - Pharmacy.
 - Medical and surgical in-patient units.
 - Rehabilitation and Palliative Care in-patient units.
 - Women's Health and Paediatrics.
 - Ambulatory Care for community outpatient services.
 - Administration including Education and Training.
 - Front of House including Retail.
 - Back of House including Mortuary.
- Internal road network and access from Princes Highway.
- Secondary road access (controlled access for Emergency vehicles only) from Caswell Street to north of the project site.
- At grade car parking.
- Loading dock.
- Helipad.
- Ancillary landscaping including the Walawanni, Meeting Place and Healing Place.

Architectural drawings are included at **Appendix D**. A photomontage of the proposed development is shown at **Figure 11**.



Figure 11 Indicative Photomontage of the Eurobodalla Regional Hospital

Source: Conrad Gargett

Table 4 below provides an overview of the Project.

Table 4 Key Project Information

Component	Project
Project Summary	Construction and operation of the new Eurobodalla Regional Hospital.
Project Address	Lot 2 DP 1281576 at Princes Highway, Moruya
Project Area	21.94 hectares
Proposed Use	Hospital (health service facility)
Physical Layout and Design	A 3-storey irregular shaped building situated in the northeastern portion of the site. The building will comprise two main components, being a foyer area located at the centre of the building which includes the main reception area and retail tenancies, and four wings which expand from the foyer area to accommodate all support spaces and back of house services.
Site Preparation Activities	Earthworks, tree removal and ancillary development on adjacent land
Gross Floor Area	18,838m ²
Maximum Height	25m
Storeys	3 storeys
Car Parking	384 formal parking spaces and a further 94 informal parking spaces available in overflow areas, if required.
Tree Removal	Removal of 86 trees within the site boundary and on adjacent land, including 16 habitat trees which will be relocated.
Proposed Tree Planting	210 trees
Jobs	Construction: 306 Operation: 518 (inclusive of new jobs and jobs relocated from other hospitals)

Component	Project
Operational Hours	24 hours a day, 7 days a week
Construction Hours	7:00am and 6:00pm on Monday to Friday. 8:00am to 1:00pm on Saturday. No work to take place on Sunday or public holidays.
Construction Staging	The work proposed as part of this SSDA will be carried out as a single stage. The construction works are anticipated to commence in Q3 2023 and will be completed in Q4 2025.

3.1.1 Design Principles

The following Design principles have been developed to outline the objectives and vision for the project:

- **People and Culture** – People and culture are at the forefront of the design approach through community involvement to empower and bring positive change and meaningful opportunities.
- **Materiality** – Natural sustainable materials local to site and region will be embedded through interior elements and provide a sensory experience and familiarity. The design will look to source from local supply chains to support a sustainable approach.
- **Connection to Country** – The design will maximise the connection to landscape, Aboriginal culture and technologies to embed into the design providing a familiar and safe environment.
- **Holistic Healing** – A holistic approach to connect people with nature in positive and affirming ways to create a calm, healing environment.
- **Human Centric Design** – Consideration of the experience for all people in the hospital environment including patients, visitors, clinicians, researchers and staff to capture innovative outcomes for an all-inclusive environment.
- **Activity Based Design** – The hospital has incorporated activity based design concepts in design and planning, therefore activity based design initiatives will be woven into the interior architecture design.

3.2 Connection to Country

As outlined in the Design Report (**Appendix D**), the project will celebrate the enduring spirit of Country, acknowledging the healing and ceremonial qualities of this place, and protecting land, water and sky Country. The hospital design seeks to represent the significance of the site and the wider Eurobodalla Region for the people of the Yuin Nation as the traditional custodians of the land. The Ancestral stories of Country, the Aboriginal knowledges of caring for Country and the local languages of Country will be reflected in the landscape, architecture, and the clinical and non-clinical spaces of the hospital.

The site has historical and cultural significance to the Aboriginal community in Eurobodalla and Southern NSW. It is located within an accessible and diverse, open landscape and provides ample resources which would have been suitable for human occupation and daily activities.

Yerrabingin, as the Connecting with Country consultants, have developed series of principles to ensure that the Eurobodalla Regional Hospital can maximise the potential for positive 'Connection to Country' outcomes. These principles are as follows:

- In line with the original use of the site, dedicate space for traditional custodians to continue their cultural practices on Country.
- Draw upon available research to gain understanding of local history and culture which reveals traditional ways of recording knowledge and to build relationships within the Aboriginal community.
- Incorporate traditional, local land and water management techniques into the design of the hospital through the implementation of ESD strategies.
- Partner with local Aboriginal-owned businesses during the planning, design, delivery phases and beyond.
- Create an opportunity for interaction within internal and external spaces to allow people (Indigenous and otherwise) to build on their knowledge of Aboriginal culture.
- Provide an ongoing line of communication with key stakeholder to provide feedback on successful practices that can be carried into future projects.

Overall, the adoption of a Connecting with Country ethos is fundamental to the development of the site and the surrounding areas. The project has prioritised integration of the built form into the existing landscape and natural

topography. The project will incorporate a diverse range of native plants minimise the impact that a new building could have on an otherwise greenfield site and to help restore some biodiversity to the area. The project will encapsulate a connection and celebration of Country throughout the project lifecycle.

3.3 Site Preparation

3.3.1 Earthworks

Bulk earthworks will be undertaken across the site to accommodate the proposed built form and internal roads. It will result in a maximum cut of approximately 4.5m and a maximum fill of approximately 3.5m. Prior to excavation works, existing grass, topsoil and root affected material will be stripped.

Further detail is provided in the and the Geotechnical Report (**Appendix E**).

3.3.2 Tree Removal

To accommodate the proposed works, the project seeks approval for the removal of 86 trees (and associated rootballs of any trees or shrubs proposed to be removed), including removal and subsequent relocation of 16 hollow-bearing fauna habitat trees – both within the site boundaries and on adjacent land.

An assessment of biodiversity and tree removal is provided respectively at **Section 6.17** and **Section 6.28**.

3.3.3 Development on Adjacent Land

To accommodate the proposed development, works are required to be undertaken on land located outside of the site boundary. This includes the removal and relocation of 62 trees in the area located directly north of the site, comprising Lot 69 DP 752151 and the road reserve. These works are required to accommodate the helicopter flight path and vehicle access to the site. Further detail is provided at **Appendix AA**.

In addition, a driveway located off Albert/Caswell Street will be constructed within the road reserve located directly north of the site. Further detail is provided in **Section 3.7.1**.

3.4 Building Height and Massing

The majority of the Eurobodalla Regional Hospital campus will be situated in the north-eastern portion of the site. The project comprises a 3-storey building that will have a maximum height of 32.280 AHD (25m) when measured from the ground (including plant). The building will have a total GFA of 18,838m².

The building massing comprises two components:

- Foyer Area – located at the centre of the building to provide a greeting place and circulation hub for staff, patients and visitors. The foyer area opens out to occupiable landscape space and includes the main reception area and retail tenancies.
- Wings – the building includes four wings which expand from the foyer area to accommodate all support spaces and back of house operations. The wings are generally identical in size and shape.

The built form elements of the proposed hospital are shown in the building elevations prepared by Conrad Gargett (**Appendix D**) and included in **Figure 12** to **Figure 15** below.



Figure 12 Building Envelope – Northern Elevation
Source: Conrad Gargett



Figure 13 Building Envelope – Eastern Elevation

Source: Conrad Gargett



Figure 14 Building Envelope – Southern Elevation

Source: Conrad Gargett

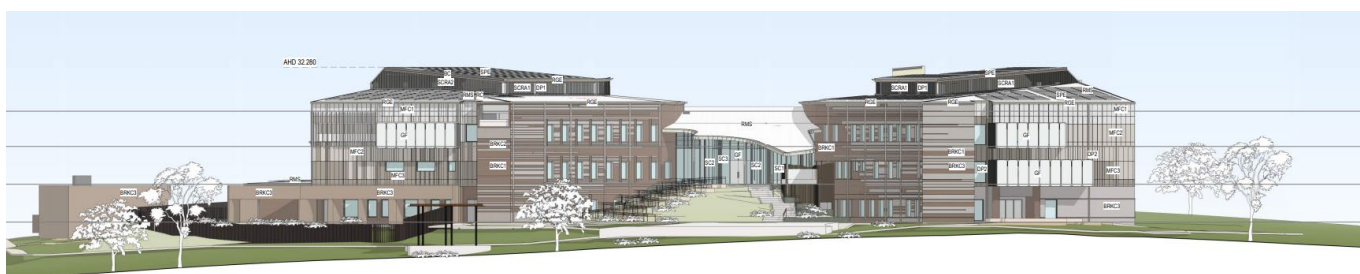


Figure 15 Building Envelope – Western Elevation

Source: Conrad Gargett

The Eurobodalla Regional Hospital has been designed to respond to the clinical needs of the region, as well as existing environmental constraints of the site. The key components of the hospital design are described in the sections below.

3.4.1 Main Entrance and Drop Off

The main entrance to the hospital is provided from the proposed foyer area at the centre of the building. From the main entry, staff, patients and visitors can access the Eurobodalla Regional Hospital from ground level. Pedestrian paths will be provided from the car park to provide connection to the main entry.

Drop off and pick up will occur via a roundabout which is located adjacent to the foyer area. Dedicated access to the emergency department will also occur from this roundabout.

3.4.2 Helipad

A helipad is proposed to be constructed adjacent to the northern boundary of the site. This location was chosen following extensive consultation with relevant stakeholders and is based on its proximity to clinical services and prevailing wind conditions. The location of the helipad will also avoid key site constraints such as topography, flooding, bushfire, ecology and adjacent residential dwellings. Further detail regarding the helipad is provided in the Aviation Report at **Appendix G**.

3.4.3 Ancillary Retail

A small amount of retail space is to be provided on the Ground Floor of the hospital, within the foyer area. This retail will be ancillary to the hospital use, such as a florist or cafe premises, that will cater to the needs of the hospital and its users.

3.5 Materials and Finishes

Conrad Gargett have selected a combination of contemporary materials and finishes that aim to create visual interest and blend harmoniously into the surrounding landscape. The base palette has been chosen to relate to Country and utilises colours and materials informed by the earth, vegetation and the sky.

The façade of the Eurobodalla Regional Hospital utilises two key material 'skins', including the inner facing facade comprising textured brickwork, and an outer facing skin with articulated metal cladding. The inner facing facade responds to the journey through the building through a change in colour form from light to warm as people move towards the centre of the built form. The outer facing skin draws on a broader response to the surrounding landscape through organic lines and modulation.

The building façade will also include 'end' elements which will act as a transition between the inner facing facade and outer skin. The ends will be expressed as glass pods and will maximise views of the surrounding area from within the hospital building.

An additional feature of the design is the use of granite and granite inspired elements, which is reminiscent of the site's connection to this material. In particular, granite excavated from the site will be re-used throughout the development (such as within landscaped areas, building joinery, and seating elements).

The proposed materials and finishes are shown in the Design Report at **Appendix D** and in **Figure 16** below.



Figure 16 Inner and Outer Façade Skins

Source: Conrad Gargett

3.6 Signage

Development consent for the following building identification signage is proposed:

- One (1) illuminated building identification sign fixed to the building's southern façade. The sign dimensions will be 4800mm wide x 1800mm high.
- One (1) emergency drop off sign fixed to the building's eastern façade, above the Emergency Department entrance. The sign dimensions will be 7800mm wide x 800mm high.

In addition, wayfinding signage will be provided throughout the hospital campus to improve legibility and navigation for pedestrians and vehicles. Wayfinding signage will be fully integrated into the design of the built form and will utilise high quality material. Where possible, Connection to Country will be strengthened through utilising the Dhurga language on signs.

3.7 Car Parking and Access

3.7.1 Vehicle Access and Internal Circulation

This application seeks approval for a number of vehicle access arrangements.

Primary access to the site will be provided from the Princes Highway via a roundabout intersection which has been approved through a separate planning approval (see **Section 1.6**). Secondary vehicle access will be achieved via a driveway located off Albert/Caswell Street which is managed by a gate to limit access for emergency vehicles only.

Within the hospital site, the 'Main Drive' will be constructed from the Princes Highway in the south to the built form in the north. It will enable access to the car park and the main entry roundabout. Ancillary roads will also be constructed, including an orbital loop around the car park which provides access to the loading dock area.

The main entry roundabout will be located adjacent to the hospital foyer area. It includes vehicle drop off spaces and will enable access to the main hospital entrance, emergency department and ambulatory department.

An additional roundabout will be constructed to the east of the built form and will accommodate the following internal circulation:

- General vehicle traffic travelling to the drop off/pick up facilities.
- Buses utilising the stop or layover area.
- Service vehicles and ambulances accessing the relevant docking area.
- Vehicle traffic travelling to the car parking area.

Vehicle access and internal circulation is shown in **Figure 19** below. Further detail is provided in the Transport and Traffic Impact Assessment prepared by Bitzios Consulting and included at **Appendix H**.

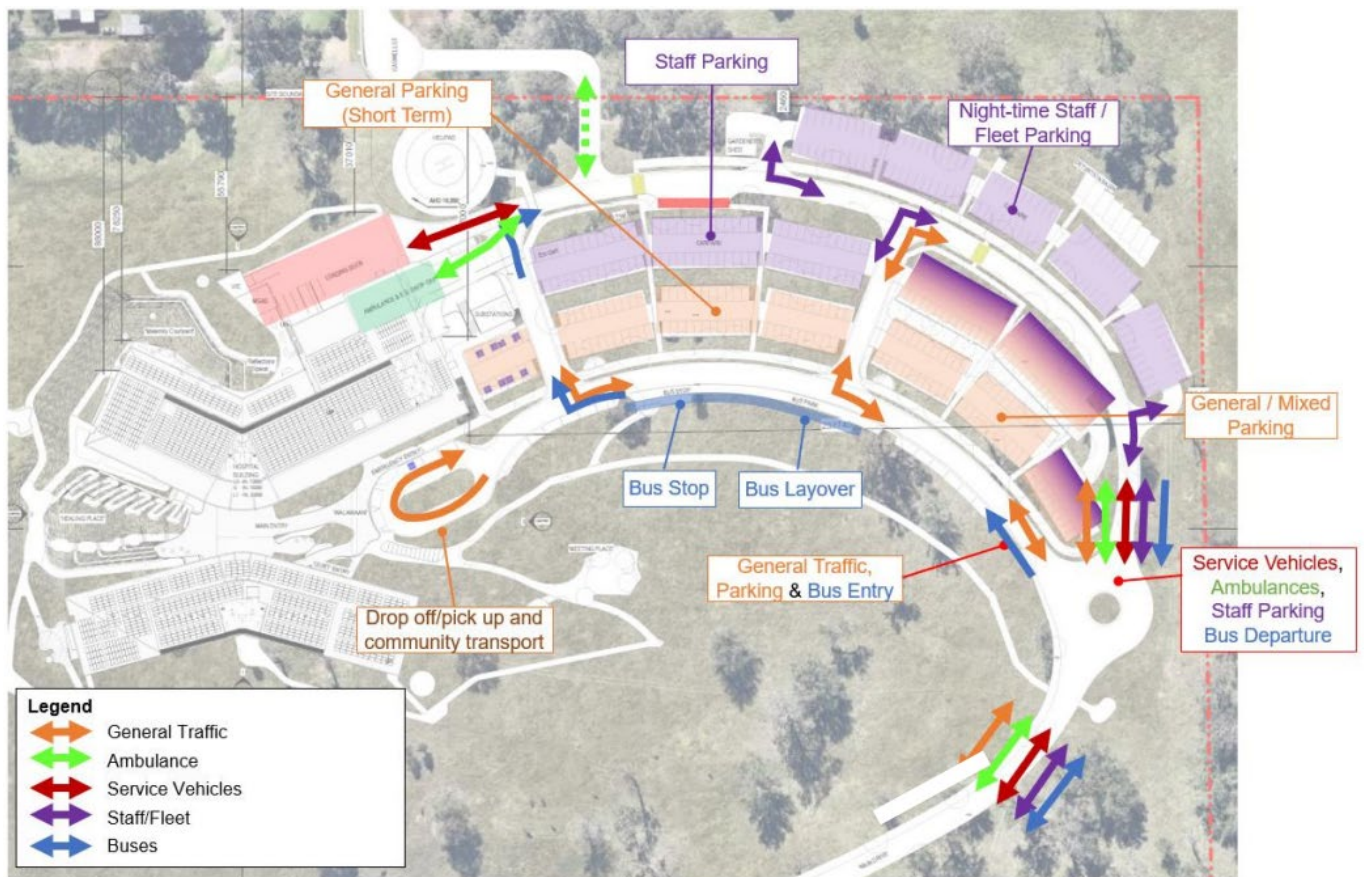


Figure 17 Site Access and Internal Circulation

Source: Bitzios Consulting

3.7.2 Car Parking

In accordance with the forecast staff, patient and visitor demands, the proposed development will provide 384 formal car parking spaces, in addition to 94 informal overflow spaces as part of the development. Providing a total of 478 parking spaces. All parking will be accommodated within the car parking area located to the east of the proposed hospital building.

3.7.3 Loading Facilities

A loading dock will be located at the rear of the hospital building. Access to the loading dock will be provided via the orbital loop that runs around the carpark. The loading dock will be designed to accommodate vehicles up to a 19m AV for oxygen and gas deliveries, and smaller service vehicles (between 6.4m to 12.5m) for a range of other deliveries and servicing requirements.

3.7.4 Ambulance Facilities

Ambulance facilities will also be provided at the rear of the building. The area has been designed to cater for up to three 6.4m SRV ambulances and can accommodate one additional emergency vehicle (police, fire, paramedics) if required.

3.7.5 Public Transport

As shown in **Figure 17** above, a bus stop will be provided on site. Initial consultation has been undertaken with bus service provider within the region to modify existing bus routes to enable connection to the hospital.

A bus layover area will also be provided on the site.

3.7.6 Pedestrian / Cycling Access

Pedestrian access to the site is provided from the existing pedestrian infrastructure on Caswell Street and in the wider Moruya area. The project will include connections to the existing pedestrian infrastructure through the provision of

pathways throughout the site. They will provide connection between key areas including the car park, bus stop and the hospital building.

End of trip facilities will be provided on the lower ground level and will include bicycle parking spaces, showers and changing rooms.

3.8 Landscaping and Public Domain

Landscape Drawings have been prepared by Site Image and are included at **Appendix I**. The site will comprise extensive outdoor green space which can be utilised via the pedestrian pathways. Seating and gathering areas will provide opportunities for relaxation or recreation within the natural landscaped outdoor spaces. The key elements of the landscape design which will be carried out include:

- **Walawaani** – The Walawaani serves as the key entry space to the building and will connect to the foyer area. Seating and shelter will be provided within this space to improve comfort for those waiting to be collected from the adjacent drop off area.
- **Healing Place** – The Healing Place will provide a safe and secure space for patients, visitors and staff to interact. A series of gardens separated by meandering pathways will be provided in this area. A variety of seating will also be included to accommodate the groups sizes, ages and abilities of its users.
- **Healing Place Access** – A series of stairs and ramps will provide access from the Ground Floor to the Healing Place on the Lower Ground Floor. Terraced planters will be provided within this space.
- **Reflections Courtyard** – A range of intimate and group seating will be included within the Reflections Courtyard to allow for peaceful gatherings or relaxation. Tree canopy and architectural shelters will provide screening from the elements. Native planting will also be provided within this space.
- **Mothers and Babies Courtyard** – An outdoor area will be provided adjacent to the birthing unit. The courtyard will include seating, shelter and planting that aims to provide comfort and respite from the indoor clinical environment.
- **Palliative Care Courtyard** – This courtyard allows for palliative care patients to site or have their beds taken outside. Planting will provide relaxing environment and allow users to connect with nature.
- **Meeting Place** – A series of gardens and seating spaces will be provided to accommodate ceremonies, gatherings and use by groups and individuals. Significant planting such as bushtucker and medicinal species will be provided within this space.
- **Spring Forest** – The existing native vegetation within the southeast corner of the site will be retained and protected. In future stages, the Spring Forest is likely to be utilised for educational opportunities.
- **Main Drive** – The alignment of the Main Drive has been designed to retain as many trees as possible. Additional tree planting will be provided along the Main Drive.
- **Car Park** – The car parking area will incorporate garden beds with canopy tree planting and understory planting at a low height to maintain sight lines for vehicles and pedestrians. Infiltration beds will also be provided throughout the car park to capture and filter water.
- **Existing Riparian Paths** – In future stages, there is an opportunity to revegetate and provide space to interact with the existing riparian paths.

An overview of the proposed landscape design is shown in **Figure 18**. Further detail is provided at **Appendix I**.



Figure 18 Proposed Landscape Design

Source: Site Image

3.9 Lighting Strategy

Night time lighting will be required to support the needs of a major regional hospital. All lighting will be designed and documented in accordance with AS/NZ standards 1680 and 4282-1997 Control of the obtrusive effects of outdoor lighting.

3.10 Ecologically Sustainable Development

The proposed development will incorporate Ecologically Sustainable Development (ESD) strategies and principles. In particular, the following initiatives will be incorporated into the proposed development:

- Reducing greenhouse gas emissions through utilising energy efficient building systems and on-site renewable energy.
- Minimising water use through rainwater harvesting and reuse for irrigation and through reducing stormwater discharge.
- Identifying any climate risks on site and incorporating mitigation measures to improve building resilience.
- Encouraging activity transport uses through the provision of end of trip facilities and secure bicycle parking.
- Reducing waste during the construction process through using locally sourced materials and by aiming to divert at least 90% of construction waste from landfill.

3.11 Infrastructure and Services

The required connections to infrastructure and services for the proposed development are provided in the:

- Electrical and Communications Infrastructure Report at **Appendix J**;
- Hydraulic and Fire Services Plan at **Appendix K**; and
- Civil Engineering Report at **Appendix F**.

The proposed infrastructure and services required to accommodate the hospital development are detailed in **Table 5** below.

Table 5 Proposed Infrastructure and Services

Infrastructure/Service	Comment
Water	The hospital will require a 100mm water connection for domestic cold water and a 150mm water connection for fire services. The proposed development will connect to the existing mains located on Albert Street, which is sufficient to service the anticipated site requirements.
Electricity	A new substation is proposed to service the new hospital. New underground high voltage (HV) cables will be provided from the substation to the site in accordance with the requirements from Essential Energy, as the electricity service provider.
Communication Infrastructure	The existing communication infrastructure within the area has been deemed unacceptable for the hospital, given that it provides an NBN wireless connection only. Accordingly, a fixed wired dual connection lead-in service augmentation will be required for the proposed hospital. Subject to a detailed design review, Telstra is the likely service provider given they have existing assets located directly south of the site along the Princes Highway. A second lead-in service will also be provided to enable a fixed wire connection.
Fire Services	A 150mm water connection will be required for fire services, including fire hydrants and sprinklers. The development will connect to the existing mains located on Albert Street, which is sufficient to service the anticipated site requirements.
Sewerage	A new sewer connection point for the hospital is proposed to be installed within the project site. It will connect to a new sewer pump station which is to be installed by Council and will service the hospital and other sites in the surrounding area.

3.12 Land Use and Operational Details

The proposed development will establish the use of the site as a hospital. The operational details of the development are provided in the sections below.

3.12.1 Beds and Treatments Spaces

The hospital development will provide the following services and treatment spaces:

- Pathology
- Pharmacy
- Administration
- Ambulatory Care for community outpatient services
- Medical Imaging
- Intensive Care Unit / Close Observation Unit
- Emergency Department
- Rehabilitation and Palliative Care
- Women's Health and Paediatrics
- Operating Theatres
- Mortuary

3.12.2 Operating Hours

The proposed hours of operation for the hospital are 24 hours a day, seven days a week.

3.12.3 Staff (Operational Jobs)

The proposed development will generate approximately 518 operational jobs at the time of opening, and 594 jobs by 2031. This includes new jobs and jobs relocated from the Moruya Hospital. By 2031 an additional 227 jobs will be created by the development.

3.13 Staging and Delivery

The construction works will be carried out as a single stage. Works are anticipated to commence in Q3 2023 and will be completed in Q4 2025.

3.14 Construction Management

Construction activities will be undertaken between 7:00am and 6:00pm Monday to Friday, and 8:00am to 1:00pm on Saturday. No work is to take place on Sunday or public holidays.

The construction works will result in the provision of 340 jobs (both direct and indirect).

4.0 Statutory Context

Development approval is sought for the project under the State Significant Development provision of Part 4 of the *Environmental Planning & Assessment Act 1979*. The project's key statutory requirements are outlined in the sections below. This section is complemented by a statutory compliance table at **Appendix C** that identifies all statutory requirements and where those requirements have been addressed in the EIS.

4.1 Land Use Definition

The project is defined as a 'Hospital' under the Standard Instrument, which is a type of 'Health Services Facility'.

4.2 Permissibility

The project is located on land which is subject to the Eurobodalla Local Environmental Plan 2012 (LEP 2012). The site is zoned part R2 Low Density Residential zone and part RU1 Primary Production. However, it is noted that all development works will be undertaken within the area of the site zoned R2. Under the TI SEPP, R2 zone is identified as a prescribed zone, and any development for the purposes of a health services facility is permissible with consent within that zone.

Therefore, the proposed hospital is permissible with consent in the R2 zone.

4.3 Power to Grant Consent

4.3.1 Declaration of State Significant Development

Development consent will be sought under 'Division 4.7 - State Significant Development' of the EP&A Act.

Section 4.36(2) of the EP&A Act states that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

Schedule 1 of Planning Systems SEPP lists development that is declared State significant development. Schedule 1, Clause 14 states:

Development that has a capital investment value of more than \$30 million for any of the following purposes—
(a) hospitals,
(b) medical centres,
(c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).

As the project is for the purpose of a hospital and has a CIV of more than \$30 million, it is declared State significant development.

4.3.2 Consent Authority

Section 4.5 of the EP&A Act and Section 2.7 of the Planning Systems SEPP stipulate that as an application made by a public authority the consent authority is the Minister for Planning (or DPE as their delegate).

Clause 294(a) of the EP&A Regulations provides that development carried out by a public authority (not being a Council) is Crown development. HI is recognised as a public authority and therefore, the proposed development is Crown Development by virtue of this clause. Division 4.6 of the EP&A Act provides that in relation to Crown development applications, a consent authority is unable to impose a condition of consent without the approval of HI or the Minister.

4.4 Other Approvals

The following section outlines other legislative approvals that may be required for the project in addition to a development consent under Division 4.7 of the EP&A Act.

4.4.1 Consistent Approvals

Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The following table lists legislative approvals that are required for the project and cannot be refused if the project is approved.

Table 6 Consistent Approvals under Section 4.42 of the EP&A Act

Act	Approval Required
Legislation that must be applied consistently	
Fisheries Management Act 1994	No
Mine Subsidence Compensation Act 1961	No
Mining Act 1992	No
Petroleum (Onshore) Act 1991	No
Protection of the Environment Operations Act 1997	No (note that the project includes a helipad, however, this is used exclusively for the purposes of emergency aeromedical evacuation, retrieval or rescue)
Roads Act 1993	Yes
Pipelines Act 1967	No

4.4.2 Environmental Protection and Biodiversity Conservation Act Approval

The *Environmental Protection and Biodiversity Conservation Act 1999 Act* (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. These are known as matters of National Environmental Significance. If the proposed development will, or is likely, to impact a matter of National Environmental Significance, then it is required to be referred to the Federal Department of the Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval. Presently, a bilateral agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when assessing a controlled action under the EPBC Act.

As identified within the Biodiversity Development Assessment Report (BDAR) at **Appendix L**, the project has been identified as a Matter of National Environmental Significance. Therefore, the project is required to be referred to the Federal Department of the Environment.

4.4.3 Approvals not Required for State Significant Development

Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for State significant development. The following legislative approvals would otherwise be required if the Project was not State significant.

Table 7 Legislation that does not apply

Legislation	Approval Otherwise Required
Legislation that does not apply to State Significant Development	
Fisheries Management Act 1994	No
Heritage Act 1977	No
National Parks and Wildlife Act 1974	Yes
Rural Fires Act 1997	Yes

Water Management Act 2000	No (No works to be undertaken within 40m of a body of water, including the riparian zone)
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4.5 Pre-conditions to Exercising the Power to Grant Consent

The following section identifies pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent.

Table 8 Pre-Conditions to be Fulfilled by the Consent Authority

Legislation	Pre-Condition
State Environmental Planning Policy (Transport and Infrastructure) 2021	The <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (T&I SEPP) aims to facilitate the effective delivery of infrastructure across the State. Section 2.121 requires the consent authority to provide TfNSW with written notice of the development application for developments considered a 'traffic generating activity'. The development is considered a traffic generating activity. Further detail is provided in Section 6.3.
State Environmental Planning Policy (Industry and Employment) 2021	The <i>State Environmental Planning Policy (Industry and Employment) 2021</i> (Industry and Employment SEPP) sets out planning controls for advertising and signage in NSW. Section 3.6 stipulates that a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied that: - The signage is consistent with the objectives of the SEPP. - The signage satisfies the assessment criteria specified in Schedule 5 of the SEPP. Business/Building identification signage is proposed as part of the development. A description of the proposed signs is provided in Section 3.6 and an assessment of the signs against Schedule 5 of the Industry and Employment SEPP is included in Section 4.5.1 below.
State Environmental Planning Policy (Resilience and Hazards) 2021	The <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards SEPP) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: - It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out. - If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose. The Detailed Site Investigation provided at Appendix M confirms the site can be made suitable for the proposed development. Refer to Section 6.9 below.
State Environmental Planning Policy (Biodiversity and Conservation) 2021	The <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> (Biodiversity and Conservation SEPP) applies to land in the Eurobodalla Shire LGA. It aims to encourage the conservation and management of areas of natural vegetation that provide habitat for koalas. The BDAR at Appendix L confirms that the site is unlikely to constitute a core koala habitat, therefore, no further assessment under the SEPP is required.

4.5.1 State Environmental Planning Policy (Industry and Employment) 2021

The Industry and Employment SEPP applies to all signage that under an environmental planning instrument can be displayed with or without development consent and is visible from any public place or public reserve.

The proposed signage is considered to be building/business identification signage for the purpose of assessment under the Industry and Employment SEPP, in that it will contain signage which indicates the name and business being

carried out by the occupant of the new building. The provisions within Part 3.3 of the Industry and Employment SEPP therefore do not apply. Only the objectives of the Industry and Employment SEPP and the criteria in Schedule 5 – Assessment Criteria of the Industry and Employment SEPP requires consideration.

Under Section 3.6 of the Industry and Employment SEPP, a consent authority must not grant consent for any signage application unless the consent authority is satisfied that the project is consistent with the objectives of the SEPP and with the assessment criteria which are contained in Schedule 5. The project will remain compliant with the aims and objectives of this SEPP, as it is compatible with the proposed development, provides effective communication, is suitably located and is of a high-quality design and finish.

Table 9 below demonstrates the consistency of the proposed signage with these assessment criteria.

Table 9 Industry and Employment SEPP – Signage Assessment Criteria

Assessment Criteria	Comments	Compliant
1 Character of the area		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The signage is of a scale and design which is compatible with the character of the development and the area.	✓
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	The proposed signage is consistent with the locality. No third-party advertising is proposed.	✓
2 Special areas		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The project does not detract from the visual quality of any surrounding heritage buildings or open space and has been carefully designed to include the highest quality materials that will contribute to the aesthetic of the area. The signage achieves an appropriate functional balance for the future use of the site as a hospital and will not adversely impact on surrounding development.	✓
3 Views and vistas		
Does the proposal obscure or compromise important views?	The proposed signs do not obscure or compromise any important views.	✓
Does the proposal dominate the skyline and reduce the quality of vistas?	The proposed signs are modest in design and scale, they will not dominate the skyline or reduce the quality of vistas.	✓
Does the proposal respect the viewing rights of other advertisers?	The signs do not obstruct the views of any existing signage on or in the vicinity of the site.	✓
4 Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The scale, proportion and form of the signage is appropriate for the type of the development.	✓
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposed signs are of a modest design and will effectively identify the hospital site from the surrounding streetscape and promote wayfinding through identification of key features within the site (such as car parking, open space areas, and key clinical services).	✓
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	N/A	N/A
Does the proposal screen unsightliness?	The proposed signs do not screen unsightliness, rather it fits within the design of the building.	✓

Assessment Criteria	Comments	Compliant
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signs do not protrude above the proposed roof/canopy height.	✓
Does the proposal require ongoing vegetation management?	The proposed signs do not require ongoing vegetation management.	✓
5 Site and building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The proposed signage is compatible with the scale and proportion of the proposed development.	✓
Does the proposal respect important features of the site or building, or both?	The proposed signs are respectful in their design and are appropriately integrated with the features of the buildings. The proposed signage is located at key areas of the site, including at the main site and building entrances.	✓
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The proposed signs appropriately relate to their location and are attractive and tasteful in design.	✓
6 Associated Devices and logos with advertisements and advertising structures		
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	Not applicable.	✓
7 Illumination		
Would illumination result in unacceptable glare?	The proposed signs will be internally illuminated and will not result in any unacceptable glare.	✓
Would illumination affect safety for pedestrians, vehicles or aircraft?	The illumination will not affect the safety of pedestrians or vehicles, given that the signs are internally illuminated, the illumination is directed towards the signs and are distanced from pedestrians and vehicles.	✓
Would illumination detract from the amenity of any residence or other form of accommodation?	The illumination will not detract from amenity of any residence or other form of accommodation.	✓
Can the intensity of the illumination be adjusted, if necessary?	The proposed lighting is to comprise fluorescent internally lit signs, the intensity will comply with all luminosity conditions and will not be required to be adjusted.	✓
Is the illumination subject to a curfew?	The illumination is not intended to be subject to a curfew. Notwithstanding, the illumination will be minimal and will not result in any excessive glare or cause excessive reflection.	✓
8 Safety		
Would the proposal reduce safety for any public road?	The proposed signage does not contain images, flashing lights, moveable parts and the like which would impact upon road safety.	✓
Would the proposal reduce safety for pedestrians/cyclists?	The location and scale of the proposed signs do not pose any adverse impacts on pedestrian or cyclist safety.	✓
Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The proposed signage will not obscure sightlines from public areas.	✓

4.6 Mandatory Matters for Consideration

The following section identifies matters that the consent authority is required to consider in deciding whether to grant consent to any development application.

Table 10 Matters for Consideration

Legislation		Matter for Consideration
Considerations under the Act and Regulations		
Environmental Planning & Assessment Act 1979	This EIS has examined and considered all possible matters affecting or that are likely to affect the environment by reason of the proposed development. The project is consistent with the relevant objectives of the EP&A Act for the following reasons: • It allows for the orderly economic development of the land for a public use and provides improved health care infrastructure that is able to implement contemporary models of care. • It allows for additional employment opportunities throughout the construction and operation phases. • It will facilitate ecologically sustainable development. • It achieves a high-quality design outcome that will benefit patients, staff and visitors. • It is a development for public purposes and will facilitate the delivery of community spaces. The proposed development is consistent with Division 4.7 of the EP&A Act, particularly for the following reasons: • The development has been declared to have state significance. • The development is not prohibited by an environmental planning instrument. The development has been evaluated and assessed against the relevant heads of consideration under section 4.15(1).	
Environmental Planning & Assessment Regulations 2021	The EIS has addressed the specification criteria within clause 190 and clause 192 of the EP&A Regulation. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious or irreversible environmental damage. As required by clause 4.42 of the EP&A Act, no additional approvals will be required in order to permit the development to occur. Further discussion is provided in Section 7.0.	
Mandatory relevant considerations under EPIs		
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 3.12 outlines mandatory matters for a consent authority to consider when determining an application for potentially hazardous or offensive development. Chapter 3 applies to any project which fall under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'. The works proposed as part of this SSDA fall within these definitions. Notwithstanding this, a Preliminary Hazard Analysis has been undertaken by Solanum (Appendix N) which confirms that the risks associated with hazardous substances at the proposed development will be successfully alleviated and the proposed development can be carried out.	
Eurobodalla Local Environmental Plan 2012	Clause 2.3 Zone Objectives and Land Use Table	The site is zoned R2 Low Density Residential zone and part RU1 Primary Production. However, it is noted that no works will be undertaken within the area of the site zoned RU1. Under the TI SEPP, R2 Low Density Residential is identified as a prescribed zone, and any development for the purposes of a health services facility is permissible with consent within that zone. Therefore, the proposed hospital is permissible in the R2 zone. Furthermore, it is noted that the development is in accordance with the objectives of the R2 zone, in that the zone enables other uses that provide facilities or services to meet the day to day needs of residents.
	Clause 4.3 – Height of Buildings	The site has a maximum height of 8.5 metres. The proposed development will have a maximum height of 25m which will exceed the mapped height limit. However, as the works are permissible under the TI SEPP, meaning

Legislation	Matter for Consideration	
		that compliance with the height control is not required as per Clause 5.12 of the ELEP 2012. Further discussion is provided below.
	Clause 4.4 – Floor Space Ratio	There is no mapped maximum floor space ratio for the site.
	Clause 5.10 – Heritage Conservation	The site is not listed as containing any items of local heritage under the LEP. Further discussion is provided at Section 6.4 .
	Clause 5.12 – Infrastructure development and use of existing buildings of the Crown	Works that are carried out by a public authority, that are permitted in accordance with the TI SEPP cannot be restricted or prohibited by way of the ELEP 2012. Given that HI is a public authority, and that health service facilities are permitted to be carried out on the site in accordance with the TI SEPP. The development cannot be refused on the basis that it will exceed the LEP height control. The height exceedance is considered acceptable on the basis that the proposed development will provide essential health infrastructure and has been designed in a way to minimise the visual and overshadowing impacts to the surrounding areas.
	Clause 5.21 – Flood Planning	The western portion of the site is affected by flooding. As detailed in Section 6.14 , the proposed development will not result in any changes to the flood levels (both on-site and off-site) and the future development on site will not be affected by flooding given that only minimal works will be undertaken in the flood affected portion of the site.
	Clause 5.22 – Special Flood Considerations	As per the <i>Explanation of Intended Effect: Special Flood Considerations Clause</i> , DPE have recommended that Eurobodalla Regional Council adopt clause 5.22 into the LEP which relates to special flood considerations. As detailed Section 6.14 , the proposal will not adversely affect the environment in an event of a flood and adequate measures will be put in place to manage risk to life in the event of a flood.
	Clause 6.1 – Public Utility Infrastructure	In accordance with Section 3.11 , the consent authority can be satisfied that public utility infrastructure that is essential for the project is either available on site or that adequate arrangements have been made to make that infrastructure available when it is required.
	Clause 6.2 – Development Control Plans for Land Release Areas	This clause requires the preparation of a development control plan (DCP) for areas identified for land release. The site is identified as a land release area under the LEP, however, Section 2.10(2) of the Planning Systems SEPP states that a requirement under an EPI for a DCP to be prepared before development consent is granted, does not apply to SSD. Accordingly, a DCP is not required for the application. Notwithstanding, the overarching objectives of this clause have been considered and implemented into the project where relevant. This includes: • Construction of a high quality hospital development to accommodate the needs of the growing population. • Protection of existing significant environmental features. • Implementation of various mitigation measures which aim to avoid, minimise or mitigate any environmental impacts. • Provision of end of trip facilities, bicycle parking and a bus stop to encourage public and active transport use.
	Clause 6.3 – Acid Sulfate Soil	Refer to the Detailed Site Investigation at Appendix M . The development will not affect any acid sulphate soils.

Legislation	Matter for Consideration	
	Clause 6.4 – Earthworks	Earthworks are proposed as part of this application, as discussed in Section 3.3 . The proposed works meet the objectives of this clause. Further, the works will: • Not disrupt any existing drainage patterns or soil stability. • Result in high quality fill or soil being excavated. • Not disturb any relics. The project will not result in any impact to water catchments or drinking water sources.
	Clause 6.7 – Riparian lands and watercourses	The site is affected by a Riparian Category 3 watercourse, which requires that any development within 10 metres of the watercourse consider the impact of the development on the watercourse. The development is sited a significant distance from the watercourse and it is not anticipated that there will be any impacts on the watercourse. Further detail is provided in the Civil Engineering Report at Appendix F .
	Clause 6.9 Stormwater management	As detailed in Section 6.13 , the proposed works will incorporate measures to mitigate the impacts of stormwater run off. In particular, on site detention is proposed as part of the development.
	Clause 6.17 Airspace Operation	The Aviation Report at Appendix G confirms that the use of the proposed helipad will not impact the ongoing operation of the Moruya Airport.
Considerations under other legislation		
Biodiversity Conservation Act 2016	The <i>Biodiversity Conservation Act 2016</i> (BC Act) protects native vegetation, species of threatened flora and fauna, endangered populations and endangered ecological communities and their habitats in NSW. Section 7.9 requires a development application for State significant development to be accompanied by a Biodiversity Development Assessment Report and Section 7.14 requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report. An assessment of biodiversity impacts is provided at Section 6.17 and a Biodiversity Development Application Report is provided at Appendix L.	
Development Control Plans		
Residential Zones Development Control Plan	As the development does not relate to residential development, there are no DCPs that are applicable. It is also noted that development control plans are not a matter for consideration in the assessment of SSDAs by virtue of Section 2.10 of the Planning Systems SEPP, which states that 'Development Control plans... do not apply to... State significant development'.	

5.0 Community Engagement

This chapter describes community consultation undertaken to date, outlines initial community views and describes the proposed community engagement strategy to be undertaken following the lodgement of the EIS. The Applicant's approach to community engagement is informed by the Department's *Undertaking Engagement Guidelines for State Significant Development (2021)*. This includes adopting the following community participation objectives provided in the Guideline.

5.1 Engagement Carried Out

5.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to consult throughout during the preparation of the EIS process was developed through:

- The identification of neighbours who would be impacted by the project unless mitigation measures were implemented.
- The identification of stakeholders who would have a particular interest in the project.
- The identification of stakeholders who would have information of value to the project, for example, Aboriginal groups with cultural knowledge relating to the project site.
- Consultation with the DPE. This included the community members and stakeholders listed in the project's SEARs that the Applicant was required to consult with.

As a result of the above process, the following stakeholders were identified for consultation:

- Neighbours and community members.
- Hospital users and health stakeholders.
- Government Architect NSW.
- Eurobodalla Shire Council.
- Transport for NSW.
- Local Aboriginal Community and Cobowra Local Aboriginal Land Council.
- Department of Planning and Environment.
- Heritage NSW.
- NBN Corporation.
- Essential Energy.
- Telstra.
- Environmental Protection Authority.
- Ambulance Service of NSW.
- Fire and Rescue NSW and the Rural Fire Service.
- State Emergency Services.

5.1.2 Consultation Methods

A range of consultation methods were used throughout the EIA process to engage community members and stakeholders. This includes ongoing meetings and liaison with stakeholders via in person and electronic means.

Throughout the EIS process, all stakeholders above were either contacted and/or met with in person or online. Key stakeholders were engaged with to identify key matters of consideration that would inform the built form design, focusing on both clinical and non-clinical design elements.

5.1.3 Aboriginal Community Consultation

Consultation was undertaken with Aboriginal groups during the preparation of the Aboriginal Cultural Heritage Assessment in accordance with the *'Aboriginal Cultural Heritage Consultation Requirements for Proponents*

2010' and the requirements of Clause 60 of the National Parks and Wildlife Regulation 2019.

The aim of the consultation process was to integrate cultural and archaeological knowledge and ensure registered Aboriginal stakeholders have information to make decisions on Aboriginal cultural heritage. The Aboriginal consultation process involved the following stages:

- Stage 1 – Notification & Registration of Interest
- Stage 2 – Presentation of Project Information
- Stage 3 – Gathering Information about Cultural Significance
- Stage 4 – Review of Draft Cultural Heritage Assessment

A summary of the Aboriginal consultation process and outcomes is provided in the Aboriginal Cultural Heritage Assessment Report (**Appendix P**).

5.2 Stakeholder Views

The following table outlines the key issues/matters raised by community members and stakeholders during the preparation of the Scoping Report, SEARs and EIS.

Table 11 Summary of Stakeholder Views

Feedback received	EIS Section / Comment
Design	
Importance of sustainable design	Ecologically Sustainable Development (ESD) principles incorporated into design, as per ESD report. This is discussed further in Section 6.16 .
Access for community members, staff, ambulance and deliveries	The access and layout of the hospital has been designed through continuing consultation with hospital user groups and stakeholders.
Concern around the helipad location, noise and proximity to the residents	The project has undertaken noise assessments and numerous helicopter and helipad studies to determine the best location of the helipad considering the numerous environmental and social impacts, as well as the noise levels and how they can be mitigated. An aviation assessment is included at Section 6.20, and relevant mitigation measures are included at Appendix B.
Concerns around certain features (e.g., facility layout/design for function, connectivity, staff areas) in the building being included	Access to, and the layout of the site and facility, has been designed through continuing consultation with hospital user groups and stakeholders. Layout designed together with SNSWLHD and hospital users.
Incorporation of Indigenous design elements and supporting connection to Country	A Country centred design approach has been undertaken, including extensive consultation with local Aboriginal communities. This is discussed further in the design report at Appendix D .
Connectivity	
Concerns around connectivity and flow of departments	Layout designed together with SNSWLHD stakeholder and hospital users.
Coordination with Moruya bypass	Health Infrastructure is working with TfNSW to integrate planning of the Moruya bypass and new Eurobodalla Regional Hospital, including how access will be managed between the bypass, existing Princes Highway, Moruya town centre and the hospital site. A bypass of Moruya would not stop future expansion of the new hospital, noting that access via the bypass may assist in improving emergency access, reliability and response times.

	The hospital site entrance for all public and hospital vehicles, including ambulances, will be via a new roundabout off the Princes Highway. A secondary access point will also be provided at the north of the hospital site for emergency vehicles only.
Parking	
Concerns around lack of undercover parking and safe parking for less mobile people	DDA compliant parking will be provided. Accessible car spaces will be provided close to the facility. Undercover areas for rest will be provided along the footpath network from the carpark to the hospital, which has been identified in the Landscape Design Report (Appendix I).
Importance of closed / covered parking and walkways	While parking will not be covered, tree canopy and undercover areas for rest will be provided on the footpath network from the carpark.
Impacts of construction workforce parking needs – parking in local streets	Parking management will be considered as part of Construction Management approach to ensure local streets are not impacted.
Transport	
Concern around the access road and not coping with traffic	A Transport and Accessibility Impact Assessment has been prepared to consider the traffic impacts. This is discussed further at Section 6.3 , with all relevant mitigation measures included at Appendix B .
Need for public transport access across all times	Noted. A bus stop is intended to be provided on site and initial consultation has been undertaken with bus service provider within the region to modify existing bus routes to enable connection to the hospital.
Construction	
Concern around how long the project will take	The construction period is approximately 2.5 years. This is a standard construction period for a complex project such as this.
Concern about impact of noise, dust and vibration from construction on adjacent residents	To be managed as per legislative requirements and will be outlined in the Construction Management approach.
Noise	
Building design with noisier departments being closer to residents	Noise levels from hospital have been assessed in the Noise and Vibration Impact Assessment. This is discussed further at Section 6.7 .
Impact of helipad and helicopter noise on adjacent residents	Noise levels from hospital have been assessed in Noise and Vibration Impact Assessment (see Section 6.7). Flight paths and requirements are included in the Aviation Report (see Section 6.20).
Operation	
Recommendations on various specialties/services that should have been included	The project team has worked closely with SNSWLHD and hospital user groups over a long period of time to determine what would be offered at the hospital.
Safe spaces for mental health and mental health support important	Flexible mental health spaces will be available.
Privacy and discretion (when coming to hospitals) are highly valued	Privacy has been considered in a variety of ways, including a welcoming main foyer, separate Emergency Department access, and a discrete secondary access to Ambulatory Care.
Government Decision Making	
What happens to the decommissioned sites?	Once the Eurobodalla Regional Hospital is operational, the existing Batemans Bay and Moruya Hospitals will be shut down. The transition and decanting to the new hospital will be supported by a communications and transition plan.

	Funding to plan a new community healthcare hub in Batemans Bay was announced in August 2021. The new HealthOne facility will provide additional healthcare services to complement the new hospital and provide the people of Eurobodalla with greater access to care, closer to home.
Community consultation	
Not coming back and engaging with the local residents was a concern	Ongoing consultation has been undertaken since 2021. Refer to the Engagement Outcomes Report at Appendix O .
Residents wanted to know of other avenues they have to oppose the plans or give feedback	Via the consultation being run by Health Infrastructure for the SSDA and when the EIS is on exhibition.

5.2.1 Exhibition and Assessment

Following its submission, DPE will exhibit the EIS on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, DPE may require the Proponent to prepare a Submissions Report in response to issues raised. The Proponent will continue to liaise with DPE and stakeholders during the Project's assessment to address queries that may arise. This includes:

- Letterbox drop to the same distribution range as previously notified.
- Email to the project distribution list.
- Letters to key stakeholders.
- Updates to the project specific website.

A summary report highlighting stakeholder and community feedback received during the exhibition period.

5.2.2 Post-Approval

The Applicant will implement stakeholder consultation strategies consistent with any relevant Conditions of Consent requirements, as well as any additional consultation required to ensure that all stakeholders are able to engage and provide feedback appropriately throughout the post-approval process. The methods of this post-approval consultation will be defined based on the feedback and ongoing consultation requested by relevant stakeholders.

6.0 Assessment of Impacts

This section of the report assesses and responds to the environmental impacts of the proposed SSD Application. It addresses the matters for consideration set out in the SEARs (see **Appendix A**). The Mitigation Measures proposed to mitigate any environmental impacts are provided at **Appendix B** and complement the findings of this section.

6.1 Urban Design

6.1.1 Bulk and Scale

The proposed built form and massing is a result of the extensive design analysis undertaken by Conrad Gargett and the consultant team, aimed at achieving an optimum urban design outcome for the proposed hospital campus and its local context. Specifically, the site is constrained by a number of factors, which limits the suitability of parts of the site for development. These factors include:

- Topography – The site has a sloping topography and includes a level change of approximately 50m from the northwest to the southeast.
- Vegetation – Significant trees and vegetation are located throughout the site, this includes the Spring Forest which is located in the southeast corner of the site.
- Watercourses – A significant gully feature extends from east to west on the site and acts as a natural watercourse through the site.
- Flooding – The western portion of the site is inundated with flood impacts and is affected by the Probable Maximum Flood.
- Bushfire – Bushfire danger associated with the quantum and density of vegetation requires the implementation of an APZ.

Based on the existing site context, opportunities and constraints, the most suitable location for the proposed built form was determined to be the north eastern portion of the site. Accordingly, the project has been designed to situate the hospital development predominantly in the north-eastern portion of the site with the access road from the Princes Highway and following the natural contours of the topography to minimise cut and fill, and to retain as much vegetation as possible.

The Eurobodalla Regional Hospital includes a single hospital building made up of four wings that are connected via a central foyer component. The building is 3 storeys in height but presents as 2 storeys when viewed from the east as a result of the sloping topography. The building design responds to the surrounding landscape, opportunities for significant views and topology. It includes articulation and modulation to reduce the overall bulk and scale of the building while also promoting access to natural light and experience of nature from within the internal space. Overall, the hospital design provides appropriate connectivity and form that allows for efficient functionality and use of space.

In addition, the car park has been sited to minimise vehicle conflicts and queuing around the hospital entry or emergency department. The location and design of the car park has been driven by the proposed hospital building footprint, site access, the functional requirements for an at-grade car park and the site constraints described above. Accordingly, the car park will be located to the north east of the hospital building. It will also enable opportunities for expansion as part of separate planning applications if necessary.

The built form also maximises opportunities to Connect with Country including through material selection and building articulation. This is further discussed in the Design Report at **Appendix D**.

6.1.2 Setbacks

The proposed development is located in the north-eastern portion of the site and includes appropriate setbacks to the surrounding local context. There are no prescribed setback controls for the site, therefore, the setbacks have been provided with consideration of the existing constraints and opportunities.

The development is approximated to be set back from the boundary as follows:

- North: The helipad is approximately 5 metres from the boundary, and the main hospital building is approximately 80 metres from the northern boundary.

- South: The main hospital building is approximately 250 metres from the southern boundary.
- East: The carpark is at its closest, approximately 4 metres from the eastern boundary. The main hospital building is approximately 240 metres from the eastern boundary.
- West: The main hospital building is approximately 115 metres from the western boundary.

Overall, the proposed built form will respond to the natural topography of the site and will provide generous setbacks from the surrounding local context.

6.2 Environmental Amenity

6.2.1 Solar Access and Overshadowing

The proposed development is supported by shadow diagrams prepared by Conrad Gargett (**Appendix D**). The diagrams illustrate the overshadowing associated with the proposed building envelope at 9am, 12pm and 5pm on June 21 (winter solstice) and 21 December (summer solstice).

The shadow diagrams show that the project will not result in any impact to the surrounding areas as the shadowing will be wholly contained within the boundaries of the site. During the winter solstice, the built form will result in some overshadowing to the landscape areas. The greatest impact the landscape areas will not occur until 5pm to the eastern portion of the site. The design and orientation of the built form, as well as the inclusion of several landscape areas throughout the site will ensure that sufficient solar access to key parts of the site (such as open space and hospital rooms) is achieved throughout the day and that the development will provide a high level of amenity for patients, staff and visitors.

The overshadowing impacts are shown in **Figure 19** below.

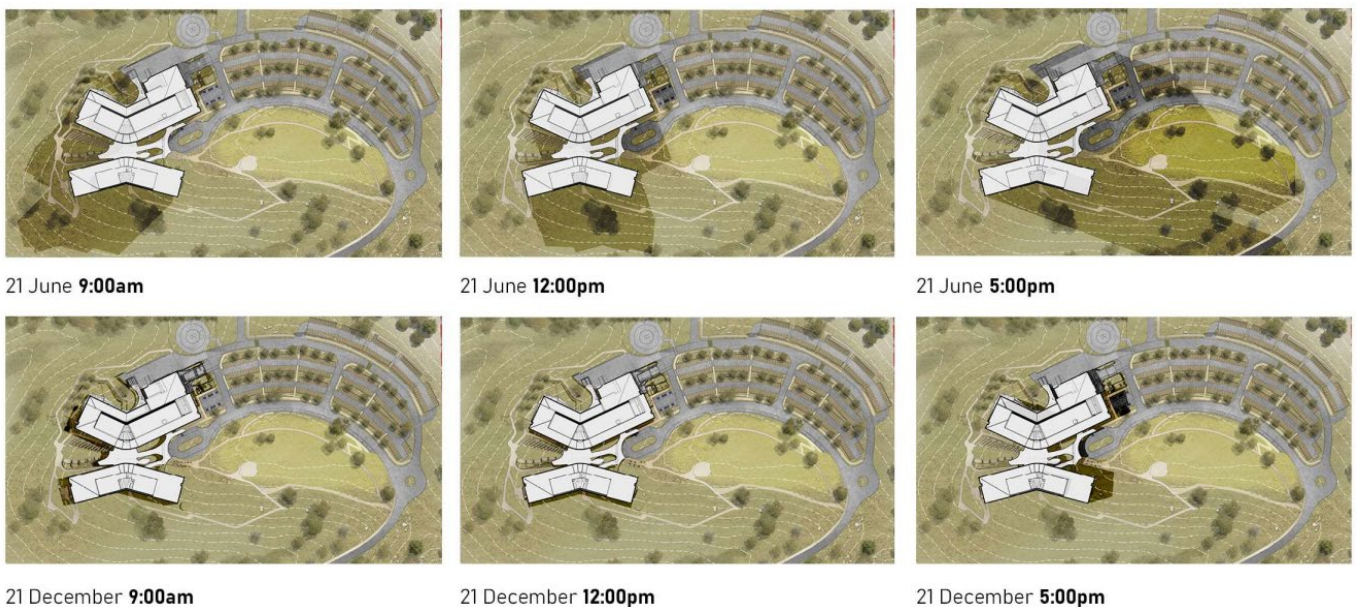


Figure 19 Overshadowing Impacts on 21 June (winter solstice) and 21 December (summer solstice)

Source: Conrad Gargett

6.2.2 Visual Privacy

The proposed built form has been designed to provide generous setbacks to the boundary and surrounding development context. The hospital building will achieve a minimum setback of approximately 80 metres to the northern boundary, providing sufficient separation to maintain privacy for adjacent residents. To further mitigate privacy concerns, the project incorporates vegetation along the site boundary to provide a natural privacy buffer at this interface. Given the location of the building, and the absence of any other adjacent sensitive uses, no other privacy impacts are anticipated.

6.2.3 View Impacts

Consideration has been given to the impact of the project on existing views from the surrounding area. Four key vantage points located within surrounding publicly accessible areas were selected for the view impact assessment. An analysis of the view impacts has been undertaken by Conrad Gargett at **Appendix D**.

A comparison of the existing and proposed views is shown in **Figure 20** to **Figure 23**.



Figure 20 Viewpoint 1: TAFE NSW

Source: Conrad Gargett



Figure 21 Viewpoint 2: Caswell Street

Source: Conrad Gargett



Figure 22 Viewpoint 3: Albert Street

Source: Conrad Gargett





Figure 23 Viewpoint 4: Princes Highway

Source: Conrad Gargett

Due to the complexity of the surrounding landscape, in particular the topography and existing site constraints, the area of greatest visual exposure to the project will be from Albert Street to the north and, to a lesser extent, Caswell Street and Princes Highway.

The development will change the character of the surrounding area due to the scale of the development on an existing greenfield site. However, the project incorporates a number of fundamental design measures that respond to the site context, that have been included in response to numerous SDRP sessions and guidance through the Connection to Country process. The development will include the use of substantial setbacks and vegetation screening to residential development to the north, which is considered acceptable when considering the site's topography and landscape values.

The project will change the character of the visual environment when compared to its existing context. Nonetheless, the visual impact is considered reasonable considering the needs of a major hospital. The project also incorporates primary measures which seek to avoid and minimise any potential significant adverse visual impacts, such as modulation, articulation and landscaping. It is noted that in the absence of the hospital project, the area is earmarked for residential subdivision and, therefore, there has been a longstanding expectation by the planning framework that the site would be developed for urban purposes.

On this basis, the project is assessed as having an acceptable visual impact and no further mitigation measures are required.

6.2.4 Lighting Impacts

Due to the 24-hour nature of the hospital use, lighting will be required throughout the night. The primary sources of light spill from the building will come building entrances and areas of higher glazing. Due to the location of the new entrances and vegetative screening at the interface of sensitive receivers surrounding the site (including residential uses to the north, 24-hour illumination of the hospital is not expected to have an impact on surrounding receivers. All lighting will be designed to comply with the requirements of AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting.

6.2.5 Internal Amenity

The proposed design will achieve high levels of internal amenity for patients, staff and visitors. The provision of double height windows will allow natural light into interior spaces, while also ensuring that the glazing does not impact on surrounding landscaped or public spaces. The placement of the windows within the central foyer, at the end of each corridor and within patient bedrooms will achieve visual privacy and also maximise views to key landscape elements surrounding the site.

Finally, balconies will be provided at the end of each corridor, adjacent to lounge areas. These balconies will maximise daylight ingress into the lounge areas and also provide an external and protected place for patients to dwell and experience the landscape.

6.3 Traffic, Access and Parking

A Transport and Traffic Impact Assessment has been prepared by Bitzios Consulting and is included at **Appendix H**. The assessment includes details around traffic movements, car parking and access arrangements. Further, the report outlines the existing surrounding road network arrangements and conditions and provides an assessment of the traffic and parking impacts associated with the project. A summary of the assessment is provided below.

6.3.1 Operational Parking

A parking demand study has been prepared for the proposed development to understand the projected parking requirements at the Eurobodalla Regional Hospital. It is based on an analysis of the following:

- The minimum parking requirements for a hospital contained within Council's Development Control Plan.
- Peak parking accumulation based on the *RMS Guide to Traffic Generating Developments*.
- Equivalent car parking rates provided for the recently approved Tweed Valley Hospital, given the similar regional context and dependency on private vehicle transport.
- Parking and traffic surveys of the existing hospital sites at Batemans Bay and Moruya.
- Forecasted staff numbers, hospital beds and consumer demand.

The analysis identified that the development would have an average parking demand for 384 car parking spaces. At the absolute peak, the project will create the demand for up to 484 car parking spaces.

The project will provide a total of 478 car parking spaces on site – comprising 384 spaces within the car parking area and a further 94 informal spaces for overflow parking. The 384 formalised bays align with the forecast average parking demand. Peak demand levels are experienced in the short period of staff shift change, for which the overflow parking spaces are aligned to the peak demand. Additionally, the implementation of the Green Travel Plan which will encourage carpooling and the use of public transport to further reduce and manage parking demand.

HI will continue to monitor the demand for parking on site and if required, additional parking can be provided as part of a separate planning application.

6.3.2 Operational Traffic Impact

Traffic generation for the site has been based on SNSWLHD clinical planning data. Future staff projections have also been based on the growth in full time staff (FTE) as per SNSWLHD forecasting. Current projections indicate that the site will have 518 FTE staff at the time of opening which will increase to 594 FTE staff in 2036. A summary of the trip generation estimates for the project is provided in **Table 12**.

Table 12 Traffic Generation Estimation

Year	Morning Vehicle Trips	Evening Vehicle Trips	Peak Vehicle Trips
2025	70	162	189
2035	94	162	233

The results indicate that by 2035, the project could generate up to 233 vehicle trips during peak times. This represents an increase of 44 vehicle trips when compared to the 2025 peak.

Intersection Performance

The primary access to the site is proposed to be through a new, single-lane roundabout intersection on the Princes Highway, which was approved as part of a separate planning approval (see **Section 1.6**). The operational performance of this roundabout has been modelled in SIDRA (**Appendix H**) and summarised below. 2026 modelling is based on a scenario where the proposed hospital is operational and the 2036 modelling is based on a scenario where additional works are undertaken on the site to increase the hospital services and beds. During 2026 and 2036, modelling of the intersection performance found that the roundabout will operate at an acceptable performance, with an overall 'A' Level of Service (LOS) during both the AM and PM peak. The only exception is the right turn from the site which will operate at a 'B' LOS during the PM peak due to the number of vehicles exiting the site during this time. Notwithstanding this, the intersection will maintain an average delay of less 6 seconds and an acceptable 95th

percentile queue, being 26.9m in 2026 and 29m in 2036. From a capacity perspective, the roundabout is suitable to provide access to the site and will not give rise to any unacceptable traffic impacts.

6.3.3 Accessible Parking

The proposed development will include 9 accessible parking spaces. Once operational, HI will monitor the demand for accessible parking and if required, will provide additional spaces as part of future planning applications.

6.3.4 Emergency Services

The development will provide ambulance parking bays which are to be designed in accordance with NSW Ambulance Specifications for Hospitals. Ambulances will reverse into the parking bays which will provide the adequate spatial requirements for each ambulance to load/unload from either the rear or side doors.

6.3.5 Loading Facilities

A loading dock will be located at the rear of the hospital building. Access to the loading dock will be provided via the orbital loop that runs around the carpark. The loading dock will be designed to accommodate vehicles up to a 19m articulated vehicle for oxygen and gas deliveries, and smaller service vehicles (between 6.4m to 12.5m) for a range of other deliveries and servicing requirements.

6.3.6 Active and Public Transport

A bus stop is intended to be provided on site and will connect to existing bus routes within the region (subject to further consultation with the service providers).

Pedestrian paths will be provided throughout the hospital campus to provide connection between key areas such as the car park, bus stop, hospital building and key landscaped areas. In addition, a path will be constructed to connect the site with the existing pedestrian infrastructure on Caswell Street and in the wider Moruya area.

6.3.7 Green Travel Plan

A Preliminary Green Travel Plan (GTP) has been provided by Bitzios Consulting and is included at **Appendix H**. The GTP provides a series of measures aimed at promoting sustainable travel and reducing reliance on the private car. The following potential measures and initiatives could be implemented to encourage more sustainable travel modes:

- Provide high quality and prominent bicycle parking and change/ shower facilities.
- Encourage cultural change through:
 - Creating a bike user group (targeting staff living within five kilometres of the hospital).
 - Events such as an annual 'car free' day.
 - Providing information detailing opportunities and facilities available to staff, such as maps of cycling routes to and within the hospital.
- Provide prioritised carpool parking spaces on-site, including consideration for incentives such as prices, location and proximity to services.
- Implement parking time limits and allocated parking to prioritise use of specific parking areas for particular users.
- Encouraging staff that drive to work to carpool through creation of an online carpooling register.
- Liaise with TfNSW and bus service providers to increase the service frequencies of existing bus routes and to provide a bus stop directly adjacent to the hospital site.
- Prepare a Travel Access Guide (TAG) ensure that it is publicly available to all staff and visitors. The TAG should be displayed on information boards to inform staff and visitors of alternative transport options.
- Work with TfNSW and transport providers to provide public transport concession card for staff that use the bus to commute daily to work.

6.3.8 Construction Traffic

A Preliminary Construction Traffic Management Plan has been prepared by Bitzios Consulting and is included at **Appendix H**. It details a number of initiatives to be implemented as part of the construction works.

It is expected that on a typical day, a total of 240 heavy vehicle movements will occur on site. These movements will be spread across the day in order to dissipate the impact. Light vehicle traffic generation would be largely generated by construction worker traffic movements to and from the site. In a worst-case scenario, there will be a total of 400-500 daily vehicle movements during the construction phase. Accordingly, any construction worker traffic movements will generally be outside of peak periods and disruption during peak periods will be avoided. Carpooling will also be encouraged to minimise trip generation.

It is not anticipated that an on-street Works Zone would be required during the construction works. If a Works Zone is required, the contractor would be required to obtain approval from the relevant authority (being Eurobodalla Shire Council for local roads and TfNSW for the Princes Highway).

6.3.9 Construction Parking

At the peak of the construction activities, it is anticipated that there will be a maximum of 300 workers on site at any given time. Construction parking will be provided within designated parking areas on site (assigned at the time of construction) which will be accessible via the Princes Highway. Given the availability of public and active transport options, private motor vehicles are expected to be the key mode of transport. Carpooling will therefore be encouraged.

6.4 European Heritage

A Heritage Impact Statement (HIS) has been prepared by Comber Consultants and is included at **Appendix Q**. The HIS has been prepared to assess the potential heritage impact of the proposed development.

There are no heritage items located on site or within the vicinity of the site. The project will have no impact upon the surrounding area or heritage items in the wider area (including local heritage item A11 *Site of Braemar Farm, formerly comprising Farmhouse remains and Outbuildings, and Bunya Pine* located approximately 1km further northwest of the site). Accordingly, the project will not result in any impact to European heritage.

In addition, the site holds both Aboriginal and archaeological significance. This is further discussed in **Section 6.5** and **Section 6.6** below and a series of mitigation measures have been developed by Comber Consultants to ensure that the project will not result in any impacts to the significance of the site. Refer to **Appendix B**.

6.5 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment has been prepared by Comber Consultants and is included at **Appendix P**. In addition, an Aboriginal Heritage Assessment was undertaken by Comber Consulting to determine the archaeological potential of the site and to ensure that the Aboriginal archaeological significance of the site is not adversely impacted upon by the proposed works.

The assessment has been prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH [now DPE] 2011), *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW* (OEH [now DPE] 2010), and the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (the Consultation Guidelines) (DECCW [now DPE] 2010).

A search of the Aboriginal Heritage Information Management System (AHIMS) was undertaken on 17 May 2021 and revealed six Aboriginal sites located within the site. These comprise:

- AHIMS ID 58-4-1104 – located in the northeastern corner of the site.
- AHIMS ID 58-4-1317 – located in the central portion of the site.
- AHIMS ID 58-4-1318 – located in the northeastern corner of the site.
- AHIMS ID 58-4-1319 – located in the eastern portion of the site.
- AHIMS ID 58-4-1320 – located in the central portion of the site.
- AHIMS ID 58-4-1321 – located outside the site boundary, immediately west of the site.

A site inspection was undertaken by Comber Consultants and members of the Cobowra Local Aboriginal Land Council on 3-4 June 2021. The AHIMS sites were not identified due to low ground surface visibility conditions, however, three Aboriginal scarred trees were identified in the southeastern corner of the site. Notwithstanding this, the trees are not located within the developable areas on site and will not be impacted by construction works.

The inspection also revealed that the creek running along the western boundary of the site had potential to be a source of aquatic animals and plant foods and the dry ridge lines had potential to be used as occupation sites. However, it is highly likely that any Aboriginal sites in this area have been disturbed through natural processes and from agricultural activities.

As described in **Section 1.6** of this report, the ACHAR prepared as part of the Soil Conservation REF recommended that Aboriginal archaeological salvage be undertaken prior to the commencement of the soil conservation works. The salvage will be undertaken in consultation with the Registered Aboriginal Parties will be undertaken prior to the SSDA approval. Accordingly, Comber Consultants confirmed that the SSDA will not result in any impacts to the Aboriginal sites and no further archaeological testing or salvage is required. Provided the mitigation measures (**Appendix B**) are carried out, the project will not result in any unacceptable impact to the Aboriginal significance of the site.

6.6 Archaeological Heritage

A Historical Archaeological Assessment (**Appendix S**) was undertaken by Comber Consultants to determine the archaeological potential of the site, to assess the significance of any identified or potential historical archaeological resources and to investigate the potential impact of the proposed works on those archaeological resources.

The Historical Archaeological Assessment confirms the following:

- There is no evidence (either in historic records or site inspection) of built structures being on the property.
- There is evidence to indicate that non-Aboriginal activity has occurred on the site. These are associated with the historical use of the site for grazing and agriculture and the staged military exercises which occurred in the 1970s.
- Overall, the archaeological potential of the site has been assessed as low.
- Remnant fences were identified, however, these are not rare or unusual and are in a poor condition. Similarly, the foxhole trenches are in a very poor condition and are not an unusual feature. These features do not meet the criteria to be considered relics under the NSW Heritage Act 1977 and can be removed if required.

Based on the above, there are no constraints on the proposed development in respect of historical archaeology. If required, archaeological features that have been identified on site as part of this assessment can be removed (provided the removal complies with the recommendations set out in **Appendix B**).

6.7 Noise and Vibration

A Noise and Vibration Impact Assessment has been prepared by Arup and is included at **Appendix T**. The report includes an assessment of the noise and vibration impacts associated with the construction and operation of the proposed development. The site monitoring and receiver locations are shown respectively in **Figure 24** and **Figure 25** below.



Figure 24 Noise Monitoring Locations

Source: Arup



Figure 25 Noise Sensitive Receiver Locations

Source: Arup

6.7.1 Construction Hours

The recommended standard hours for construction, as proposed in the Interim Construction Noise Guideline (ICNG), are:

- Monday to Friday 7:00am to 6:00pm.
- Saturday 8:00am to 1:00pm.
- No work on Sundays and Public Holidays.

All construction work will be undertaken during the standard construction hours.

6.7.2 Construction Noise Impacts

The construction noise impacts from residential receivers will be highest in the area directly north of the site. In a worst-case scenario, that construction noise is predicted to exceed noise affected levels during standard hours for both receivers during all stages of construction. In addition, the Highly Affected Noise Levels criteria will be exceeded by up to 5dB during piling works for both receivers, and to a lesser extent during bulk earthworks and site establishment from the R2 receiver.

The exceedance of the noise levels is not unusual given the heavy plant and equipment that must be used, such as excavators and hammers, and the proximity to sensitive receivers (the closest being 80m from the development site). Construction works are temporary in nature and any potential noise impact on the community and the surrounding environment will not be permanent or continuous. Where the predicted noise level is predicted to exceed the relevant requirements, all feasible and reasonable work practices would be applied. This will ensure that any adverse noise impacts to surrounding receivers are minimised. Mitigation measures are provided at **Appendix B** and include the preparation of a Construction Noise and Vibration Management Plan.

6.7.3 Construction Vibration Impacts

Based on the scope of works and typical equipment required, it is anticipated that vibration undertaken during construction will be perceivable by humans. As a result, a comprehensive Construction Noise and Vibration Management Plan (CNVMP) will be prepared by the engaged Contractor. The CNVMP will consider proposed plant, equipment and construction methodology, prior to the commencement of the project.

6.7.4 Operational Noise Impacts

Arup has identified that the mechanical plant, loading dock, noise from traffic and operation of the helipad will be the primary source of operational noise for the project. Overall, Arup has determined that the impact of the operational noise impacts is expected to be relatively minor and can be mitigated through the successful implementation of the recommendations in **Appendix B**.

Mechanical Plant

The mechanical plant and equipment associated with the operation of the development is to be controlled to ensure external noise emissions are not intrusive and do not impact on the amenity of the surrounding sensitive receivers. As is typical for this stage of the design development, final plant selections have not been made, and therefore a detailed assessment has not been carried out. Notwithstanding, an assessment will be undertaken once the detailed design of the plant has been completed. A preliminary review of the plant finds that it is able to comply with relevant controls, with a number of design strategies incorporated to reduce acoustic impact where appropriate.

Loading Dock

With regards to the loading dock, Arup assumes that no more than 10 vehicles will use the loading dock on any given day and that the use of the loading dock will generally only occur during the day. In a worst-case scenario (being 1 AV and 1 HRV arriving and reversing into the loading dock at the same time during the day period), the use of the loading dock is anticipated to exceed the relevant noise criteria by 2bB for the nearest sensitive receiver (90m). This minor exceedance is considered acceptable due to the relative short nature of the event, noting that no loading dock activities will take place outside of the daytime period. It is also considered highly unlikely that more than 1 AV and 1 HRV would arrive at the loading dock at the same time within a 15-minute period.

Traffic

The project is anticipated to result in a minor increase to the traffic on the Princes Highway during operation. Considering the existing traffic numbers along Princes Highway, the project represents an insignificant effect on the ambient noise environment in this area. In addition to this, the assessment has determined that the traffic noise

generation relating to the proposed ambulance bays, emergency department pick up/drop off and the carpark will be below the relevant operational noise emissions criteria.

Helipad

There are several critical safety and environmental considerations aviation experts must make when selecting a site for a helipad. The design and location of helipads must comply with Civil Aviation Safety Standards and Recommended Practices. They must avoid:

- Restricted airspace.
- High terrain on approach and departure paths.
- Vertical structures, obstacles and hazards, such as buildings and mobile phone towers.

Further critical safety elements that influence the selection of helipad sites include:

- Alignment with direction of average, annual and prevailing winds.
- Avoidance of flying animals and bird colonies.
- Availability of emergency landing areas.

Other desirable factors consider how the helipad will affect amenity/quality of life. These include:

- Whether the siting of the helipad can avoid populous areas and areas sensitive to noise and vibration.
- Avoidance of ecologically and environmentally sustainable areas.
- Avoidance of culturally and spiritually sensitive areas.

With consideration of the site constraints, aviation requirements and feedback from consultation with Moruya airport, Council and the Community, the Project Team (Aviation consultant and Architect) developed seven helipad options on the site for assessment.

Following the helipad option development, a Helipad Clinical Project Working Group was established with representation from Clinicians across the SNSWLHD, NSW Ambulance and Air Ambulance to assess each of the options from a clinical perspective.

Assessment criteria included:

- Helipad delivers a compliant on-grade solution to Australian Aviation Standards.
- Helipad provides a direct access to the emergency department within 100m.
- Location minimises acoustic impacts to existing residences.
- Location minimises acoustic impacts to patient amenity/rooms.
- Location minimises operational impacts i.e. closure of access roads, paths and carparking.
- Location aligns with site masterplan including future development ones, Connecting with Country principles, visual impact and ecological zones.

Two meetings were held with the Helipad Clinical Project Working Group to evaluate each of the options and determine the preferred helipad option. Given the above, the current location was the only feasible location for a helipad. It was selected on the basis that it would provide adequate proximity between the helipad and the hospital entrance while keeping somewhat remote from pedestrian and vehicular activity within the campus.

The noise impacts associated with the emergency helicopter retrievals have been assessed in accordance with precedent projects in NSW and relevant standards. Due to the highly unpredictable nature of helicopter medical retrievals, it is not possible to accurately forecast the number of helicopter movements to and from the site. For the purpose of this assessment, it is assumed that helipad will be used for one retrieval a day – comprising one approach and one departure movement.

It is also understood that a typical helicopter “noise event” includes the following components:

- Helicopter Arrival:
 - 1 minute approach and land.
 - 2 minute engine idle (then shutdown).
- Helicopter Departure:

- 1 minute start up.
- 1 minute hover and back up.
- 1 minute departure.

The use of the helipad will result in some minor exceedances (up to 11dB) of the L_{AMAX} night criteria for sensitive receivers to the north and the south of the site, given the location of the proposed flight paths. This presents a low to moderate risk for regular sleep disturbance. Notwithstanding this, the impact of helipad use will be short lived and will last for a total elapsed time of approximately 6 minutes per movement. It is strongly emphasised that the use of the helipad is highly variable and may only be used intermittently. In fact, historical data from the existing Bateman's Bay and Moruya Hospitals shows that on average a total of 242 helicopter transfers occur per year (being 87 at Bateman's Bay and 155 at Moruya), but only 54 of these helicopter movements occurred between 10pm and 6am. Arup anticipate that the consolidation of hospital services to a single site will reduce the overall number of retrievals. Therefore, there is a low to moderate risk for regular sleep disturbance impact.

Overall, the use of the helipad for emergency retrievals is also an integral component of the hospital operations. Meaning, that the noise impact as a result of the helipad is acceptable. As far as practical, all attempts will be made to minimise overflight and the noise impact resulting from the use of the helipad. Mitigation measures are included at **Appendix B**.

Cumulative Impact

The cumulative noise impact to surrounding receivers considers all the operational noise sources. It is considered that the likelihood of all noise sources concurrently operating at their maximum and impacting the receivers cumulatively is low, due to the intermittent nature of several operational noise sources. At a worst-case scenario, the noise sources impacting the receivers would be highly infrequent and only for short durations.

6.8 Contamination

This SSD Application is supported by a Detailed Site Investigation prepared by JKEnvironments and included at **Appendix M**. The reports detail the procedures and standards to be followed in order to remove the risks posed by the identified in-ground contamination issues, to make the site suitable for the proposed development while ensuring the protection of human health and the surrounding environment.

The assessment included a review of historical information and sampling from 42 borehole locations. The site has historically been used for grazing purposes.

Based on a review of the available contamination assessments and works undertaken at the site, only minor detectable concentrations of PAHs were encountered. Notwithstanding this, the concentration of the PAHs is low and does not exceed the Site Assessment Criteria (SAC) thresholds. All other contaminants of potential concern were reported at low concentrations, well below the SAC, or at levels below the laboratory detection limits.

Accordingly, the risk of unexpected, contamination-related finds is considered to be highly unlikely and can be successfully mitigated through the provision of an unexpected finds protocol which is shown at **Appendix B**.

6.9 Hazards and Risks

State Environmental Planning Policy (Resilience and Hazards) 2021 (formerly SEPP 33) establishes a protocol for planning for development that can be categorised as Potentially Hazardous or Potentially Offensive Development. DPE's SEPP 33 Guidelines (2011) establish screening thresholds for Dangerous Goods stored on site. A Preliminary Hazard Analysis has been prepared by Solanum (**Appendix N**) to identify hazardous materials and risks associated with the use of such materials in the hospital.

The following chemicals and hazardous substances will be used as part of the future hospital development:

- Liquid Oxygen;
- Toxins, including clinical waste;
- Radioactive Isotopes;
- Diesel Generator Fuel;
- Medical Gases;
- Alcohol Sanitisers;

- Caustic Detergents; and
- Lithium-Ion Batteries.

In a worst-case scenario, it is anticipated that the quantity of and vehicle movements associated with transporting liquid oxygen, toxins and radioactive isotopes will exceed the relevant SEPP 33 thresholds. Further analysis of these hazardous materials has been undertaken by Solanum and included at **Appendix N**.

Overall, the Preliminary Hazard Analysis confirms that the proposed design and operation complies with the relevant Australian Standards. The hazardous materials will present a very low risk to people, both on and off site, due to the low volumes of hazardous materials being transported and that they will be stored inside a secure building. Notwithstanding this, it is essential that a number of mitigation measures (**Appendix B**) are implemented to ensure the protection of individuals and the biophysical environment is upheld.

Provided the mitigation measures are implemented, the risks associated with hazardous substances at the proposed development will be successfully alleviated and the proposed development can be carried out.

6.10 Geotechnical Implications

A Geotechnical Investigation has been prepared by JKGeotechnics and is included at **Appendix E**. The Investigation identifies that the ground conditions on the majority of the site comprises topsoil and residual clay overlying shallow weathered granite bedrock. Bedrock levels vary throughout the site between 1.8m and 20.15m.

Groundwater was encountered during the borehole investigations, with observations made between 2.6m and 15.2m below surface level. The groundwater table will not be encountered during the proposed excavations, however, groundwater seepage will likely occur at the soil/rock interface or through joints and defects within the rock, particularly during or immediately following periods of wet weather. JKGeotechnics consider this can be suitably managed using conventional sump and pump techniques.

Based on the results of the investigation, the report provides advice on the proposed civil and structural design. Recommendations have been provided and relate to earthworks, excavation, batter slopes, foundations, disposal of material and specific geotechnical input will be sought during the construction phase of the project. Further discussion is provided in **Appendix E** and the mitigation measures are provided in **Appendix B**.

6.11 Waste Management

6.11.1 Construction Waste Management

A Construction Waste Management Plan (CWMP) (**Appendix W**) has been prepared to assess the volumes and management of waste during the construction phase in accordance with the *Protection of the Environment Operations Act 1997* and the *NSW EPA Waste Classification Guidelines, Part 1: Classifying Waste*.

The CWMP details the type, volume and disposal methods for all waste material during the construction phase. It provides details regarding the responsibilities of the principal contractor to lawfully dispose of waste and ensure that reports on the management and capacity of facilities to receive waste are recorded. Records will be kept of all wastes and recyclables generated and either used on the site or transported off-site during the demolition. Further discussion is provided in **Appendix W**.

6.11.2 Operational Waste Management

An Operational Waste Management Plan (OWMP) (**Appendix X**) has been prepared by JBS&G to provide specific waste management procedures to be undertaken during the operational phase. The WMP will be compliant with all relevant policy and legislation for waste management, including generation, handling, storage and disposal of all forms of waste.

The total estimated waste generation for the project per week is:

- 8,800 litres of general waste.
- 23,500 litres of recycling waste.
- 5,200 litres of clinical waste per week.

Waste generated on site will be transported to the waste storage area (located adjacent to the loading dock) by a cleaner or hospital staff and sorted into the relevant bin where it will await collection by the waste contractors. Further detail is provided at **Appendix X**.

6.12 Crime Prevention Through Environmental Design

The development implements the principles of Crime Prevention through Environmental Design (CPTED), as identified in the Department's guidelines titled Crime Prevention and the Assessment of Development Applications 2001 are discussed below and in the CPTED Report at **Appendix Y**.

Principle 1 – Natural Surveillance

Good surveillance means that people can see what others are doing. People feel safe in public spaces when they can easily see and interact with others. Would-be offenders are often deterred from committing crimes in areas with high level of surveillance. The development provides adequate natural surveillance in accordance with this principle.

The development has been designed to incorporate natural surveillance through the incorporation of design features that maximise visibility of people using public spaces. This will promote the reality and/or perception that open spaces are under casual surveillance during both the day and night. The well-lit nature of the hospital environment will also enhance passive surveillance and provide continuous activation throughout the site. The following principles and strategies will be adopted to enhance natural surveillance:

The following principles and strategies will be adopted to enhance natural surveillance:

- The precinct will leverage the established key spaces to create active hubs for movement and people.
- Activity will be promoted across various times of the day to ensure activated and safe spaces.
- The approach to vehicular interface will offer spaces that are predominately pedestrianised.
- Clear sight lines will be established through the precinct and between key spaces.
- Blind spots will be avoided.
- Visibility to and from internal and external spaces will be offered for passive surveillance.
- Lighting will be considered for both comfort and safety.

Principle 2 – Access Control

Access controls use physical and symbolic barriers to attract, channel or restrict the movement of pedestrians. As noted in Crime Prevention and the Assessment of Development Applications, effective access controls make it clear where people are permitted to go or not go, and makes it difficult for potential offenders to reach and victim people and damage property.

The development has been designed to incorporate natural barriers such as roadways and landscape, electronic and physical barriers through the use of the following:

- Limiting the number of public entries into the hospital and securing these after hours.
- Provision of CCTV monitoring of public areas to the hospital linked back to a security monitored point.
- Provision 24 hour security station at the Emergency Department that can respond to other parts of the hospital during occasions of duress.
- Providing electronic access points of entry and intercoms.
- Providing access control to clinical departments after hours.
- Providing 24-hour access control to engineering service areas and other sensitive sections of the hospital.

Principle 3 – Territorial Reinforcement

Territorial reinforcement refers to the clear identification of public spaces, and the creation of a sense of community ownership over such spaces. As noted in the Crime Prevention and the Assessment of Development Applications, people feel comfortable in, and are more likely to visit places which feel owned and cared for. Well used places also reduce opportunities for crime and increase risk to criminals.

Through the definition of space, territorial reinforcement provides social regulation. The proposed development has been designed with the integration of the following principles:

- Establishing a hierarchy of public and private spaces.
- Utilising informal devices such as landscaping and avoid more formal devices like high fencing and cautionary signage to define spaces.
- Design features will be considered, including art work and landscaping.
- Clearly defining spaces into public and back of house through physical barriers or appropriate directional means.
- Not mixing public, patient and back of house activity in the same space and therefore causing confusion in the diverse users of the spaces.
- Clearly identifying control points to clinical areas.
- Ensuring that circulation patterns are unambiguous and do not create confusion in offering too many options for travel.
- Reinforcing public areas by introducing amenities such as seating to attract desired users of the space and therefore deter undesirable activity.
- Clearly defining zones for public lifts and non-public (clinical) lifts to allow staff secure movement without the need to cross non-secure public zones.

Principle 4 – Space Management

Space management refers to providing attractive, well maintained and well used spaces. As noted in Crime Prevention and the Assessment of Development Applications, space management strategies include site cleanliness, rapid repair of vandalism and graffiti and the removal of damaged physical elements.

To achieve effective place management and maintenance, the proposed development will incorporate the following:

- Designing external spaces with robust finishes that require minimal maintenance.
- Ensuring clear observation lines to open areas that would be of high risk to the public such as loading docks and staff parking zones.
- Restricting access to sensitive areas such as goods lifts.

6.13 Water Cycle Management

A Civil Engineering Report has been prepared by Bonacci Group and is included at **Appendix F**. A summary of the assessment is provided below.

6.13.1 Stormwater

A number of stormwater works are proposed as part of the project and are discussed in **Appendix F**. Three dual purpose bio retention/detention basins will be constructed to reduce peak stormwater discharge from the proposed development. It will decrease the runoff from the developed site to less than the pre-development peak flow. The layout has been DRAINS to meet pre to post discharge and to satisfy Council's DCP stormwater requirements.

As per the Eurobodalla Shire DCP, stormwater pollutant removal efficiency targets are as follows:

- Total Suspended Solids: 80%
- Total Phosphorus: 45%
- Total Nitrogen: 45%
- Gross Pollutants: 70%

The average results expected from the basins on site in relation to pollutant reduction is shown in **Table 13**.

Table 13 Pollutant Reduction Targets

Pollutant	Target	Reduction
Total Suspended Solids	80%	83.4%

Total Phosphorus	45%	58.2%
Total Nitrogen	45%	47.2%
Gross Pollutants	70%	100%

Water Sensitive Urban Design (WSUD) has been adopted in the stormwater design, by minimising impervious areas, providing infiltration opportunity for runoff from impervious areas and through treatment of runoff by various methods. As a result of the WSUD and based on the above table, the proposed stormwater strategy will exceed the stormwater pollutants reduction target of the Eurobodalla Shire DCP.

6.13.2 Water and Wastewater Management

In order to reduce the demand on local water and wastewater infrastructure, the proposed development will consider the following potable water demand reduction strategies, where possible:

- Provision of low flow taps and sanitary fixtures.
- Provision of water meters to monitor water demands and leaks.
- Provision of a rainwater harvesting system to provide storage capacity and enable rainwater reuse.
- Install a water efficient irrigation system that is sub-soil drip irrigated with moisture sensor overrides.

6.13.3 Riparian Zone

The site does not contain any flowing water or natural riparian areas. However, on a site visit in February 2021, the project ecologist identified that there is a natural spring at the south of the site, which flows northward to a small dam. This flow path is being maintained in the proposed development.

The development will provide an opportunity to regenerate the site and return the watercourse area to a more natural riparian state. This is shown on the Landscape Plans at **Appendix I**.

6.14 Flooding

An assessment of the flood impacts on site has been undertaken by Bonacci Group at **Appendix F**. In general, there is a low flood risk during the 1% Average Exceedance Probability (AEP). The extent of inundation is confined to the western portion of the site. The proposed development will not be inundated as a result of the Probable Maximum Flood (PMF) event.

As part of the project, increased peak flows will be addressed through the provision of detention within the dual-purpose bio-retention/detention basins. These will be located under the loading dock. This will limit peak flows from the site post-development to pre-development levels (or less) for a range of storm events up to the 1% AEP event.

It is also considered that the project will not result in any changes to flood levels (both on-site and off-site) and the development on site will not be affected by flooding given that only minimal works will be undertaken in the flood affected portion of the site. This is subject to implementation of the recommendations at **Appendix B**.

The proposed development will be located well above the PMF. Specifically, the lowest proposed hospital floor level is RL 13.80 which is well above the PMF level of RL 8.97. This would also allow for a shelter in place approach to be implemented in the event of a flood. A preliminary Emergency Management Plan has been provided within the Civil Engineering Report at **Appendix F**. A final Emergency Management Plan would be prepared and implemented prior to the commencement of hospital operation. This is reflected in the mitigation measures at **Appendix B**.

6.15 Sediment and Erosion Control

Bonacci Group have identified a number of erosion and sediment control measures at **Appendix F**. These will be put in place to during construction to minimise the risk of sediment being washed into neighbouring properties and to avoid erosion from occurring on the site. The proposed controls will include:

- A sediment fence/catch drain (or diversion bund) around the site.
- Sandbag/Geotextile pit filters to be placed at stormwater inlet pits.
- Temporary access to site with shaker pad.

- Stockpile areas with sediment fence around it during construction.
- The stockpile must be located out of water flow paths (and be protected by earth banks/drains as required).

The design of these measures will be undertaken in accordance with the Landcom “Blue Book”. The excavation of the dual purpose bio-retention/detention basins will act as sediment basins during construction to minimise risk of sediment laden water leaving the site and to further improve water quality.

Prior to the commencement of works and once a contractor is appointed for the project, a detailed Construction and Environmental Management Plan (CEMP) will be prepared for the proposed development and will be provided as a condition of development consent. The CEMP will be prepared in accordance with the relevant applicable Australian Standards and Occupational Health and Safety requirements. It will address the following:

- Site access control, public safety, amenity and security;
- Construction hours;
- Noise and vibration control;
- Material management, waste and material re-use;
- Sediment and erosion control;
- Construction traffic management;
- Dust suppression; and
- Notification of surrounding properties and complaints handling.

The perimeter of the site is to be fully delineated and secured during construction. Whilst the construction methodology will be determined once the contractor has been appointed, the main construction activities will include:

- Bulk earth works;
- In-ground services;
- Erection of structure;
- Fit out and finishes;
- Landscaping; and
- Car parking, road works, paving and associated external works.

6.16 Ecologically Sustainable Development

An Ecologically Sustainable Development (ESD) Report has been prepared by Arup and is included at **Appendix Z**. The environmental performance of the development has been assessed against Clause 193 of the EP&A Regulations. The initiatives and targets that relate to the proposed development are as follows:

- The project will meet Health Infrastructure NSW Design Guidance Notes 58 (DGN58) which acts as a formalised framework for delivering sustainability initiatives.
- Aligning with NSW Government’s Net Zero Plan to achieve net zero emissions by 2050 with a 50% reduction in emissions by 2030, the project is seeking to transition to a fully electric building to eliminate fossil fuel use on site.

Furthermore, the proposed development is consistent with the four accepted principles of ESD. The Regulation lists four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle.
- Intergenerational equity.
- Conservation of biological diversity and ecological integrity.
- Improved valuation and pricing of environmental resources.

An analysis of these principles is provided in **Section 7.1**.

The ESD Report does not include any specific mitigation measures to be implemented as part of the project. Further opportunities for ESD will continue to be investigated, including the exploration of stretch targets as part of the project lifecycle.

6.17 Biodiversity

A Biodiversity Development Assessment Report (BDAR) has been prepared by Abel Ecology and is included at **Appendix L**. The BDAR aims to assess any biodiversity impacts associated with the project in accordance with the requirements of the *Biodiversity Conservation Act 2016* (BC Act) and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The assessment confirms that one plant community type (PCT) of native vegetation is located on the site, being *PCT 834 Forest Red Gum - Rough-barked Apple - White Stringybark grassy woodlands on hills in dry valleys, southern South East Corner Bioregion* (Southeast Lowland Grassy Woodland). The Southeast Lowland Grassy Woodland and pasture are also listed as a critically endangered ecological community (CEEC) under both the BC Act and EPBC Act.

The BDAR indicates that PCT 834 will be directly impacted and will result in the clearing of 1.56 hectares of woodland. Based on the calculation utilising the Biodiversity Assessment Method Calculator, the purchase and retirement of 57 ecosystem credits are required to offset the 1.56 hectares of unavoidable impacts to the PCT on the site.

In addition, the BDAR identified five fauna species which were assumed to be present, given that they are generally found in the region and that the site contains suitable habitat. These species are:

- White-bellied Sea-Eagle (*Haliaeetus leucogaster*).
- Southern Myotis (*Myotis Macropus*).
- Powerful Owl (*Ninox strenua*).
- Brush-tailed Phascogale (*Phascogale tapoatafa*).
- Austral Toadflax (*Thesium australe*).

The purchase and retirement of 297 species credits are likely to be required to offset the unavoidable impact to these species.

Based on the purchase of the necessary species credits, Abel Ecology has identified their support for the proposed development. Mitigation of impacts on biodiversity has been partially achieved by the relocation and reinstallation of salvaged hollows from all trees proposed for removal. The project has been referred to the Federal Department of the Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval.

A series of mitigation measures have also been identified in order to minimise the potential impacts of the project on local biodiversity values and will be implemented during the construction and operational phases. The mitigation measures are included at **Appendix B**.

6.18 Tree Removal and Tree Canopy

An Arboricultural Impact Assessment has been prepared by Abel Ecology and is provided at **Appendix AA**. The report provides an assessment of all trees expected to be impacted by the project.

An assessment carried out by Abel Ecology identified the presence of 332 trees on the site. Existing trees on the site are proposed to be retained where possible. However, the removal of 86 trees (including the removal and subsequent relocation of 16 hollow-bearing fauna habitat trees) is required to accommodate the project. This also includes 62 trees which are required to be removed on the adjoining road reserve to accommodate the proposed access road and helipad. The majority of trees to be removed have been assessed as being in poor condition or having a low retention rating.

However, the project has a significant landscaping strategy that will include the creation of additional new landscaped areas with up to 10,046m² of new tree canopy proposed to be planted. This will ensure that the design of the development will appropriately offset the required tree removal.

Abel Ecology has provided a number of mitigation measures to ensure that tree removal is appropriately carried out and will not result in any unacceptable impacts. These measures are discussed at **Appendix B**.

6.19 Bushfire

Abel Bushfire has prepared a Bushfire Assessment Report which is included at **Appendix BB**. A summary of the assessment is provided below.

The site is located on land mapped as being bushfire prone. The proposed development is considered a Special Fire Protection Purpose (SFPP) development under Section 100B of the *Rural Fires Act 1997*. Abel Bushfire has assessed the proposed development against the Specific Objectives, Performance Criteria and Acceptable Solutions prescribed for SFPP development within the Planning for Bushfire Protection 2019 (PBP).

Abel Ecology found that the dominant fire hazard on the site is the unmanaged grassland located across the site, however, this will be cleared as part of the project. The large patch of Dry Sclerophyll Forest (Spring Forest) located in the southeastern corner also carried a significant fire risk, however, this is located some 140m from the proposed development and therefore is not anticipated to increase the risk of fire on site. Notwithstanding, the hospital occupants represent a high-risk cohort and, therefore, the project will require the inclusion of an APZ that complies with the PBP Performance Criteria '*Radiant heat levels of greater than 10kW/m² (calculated at 1200K) will not be experienced on any part of the building*'. The project is capable of achieving all APZs, which will be contained wholly within the boundaries of the site. In addition, the proposed Class 9a & 9b buildings will be built in accordance with the NCC and will comply with all relevant Australian Standards.

Overall, Abel Ecology have considered that the site is not sterilised by bushfire threat. A series of mitigation measures have been included at **Appendix B** to further minimise the overall risk of bushfire for the proposed development.

6.20 Aviation

An Aviation Report has been prepared by AviPro at **Appendix G**. This SSDA proposes the construction and use of an on-grade helicopter landing site (HLS) adjacent to the northern boundary of the site. The proposed location of the HLS is suitable for use, with regards to prevailing wind conditions, proximity to the hospital and distance from any environmental constraints. The HLS will result in a small amount of overflight of populated areas, which is unavoidable in such a facility in a large regional city with surrounding residential areas. However, this has been minimised as much as possible.

The construction and operation of the Eurobodalla Regional Hospital will have no impact on the Moruya Airport OLS and will have no impact on any aviation communications, navigation or surveillance infrastructure. AviPro confirm that aviation safety will not be compromised by the project.

The Aviation Report does not include any specific mitigation measures to be implemented as part of the project.

6.21 Social Impact

Ethos Urban has prepared a Social Impact Assessment (**Appendix CC**) in accordance with the *Social Impact Assessment Guideline for State Significant Projects (2021)*. The purpose of Social Impact Assessment is to assess the impacts of the development, both positive and negative, for all stages of the project lifecycle for key stakeholders and the broader affected community.

The assessment methodology includes:

- A baseline analysis of the existing socio-economic environment, involving:
 - Study area definition, including primary and secondary geographic areas likely to be impacted.
 - Demographic analysis, including socio-economic characteristics of current communities and population forecast.
 - Review of relevant background information, along with relevant local and state policy frameworks.
- Stakeholder and community engagement: Findings of stakeholder and community consultation undertaken by Health Infrastructure have been reviewed to identify community and stakeholder aspirations and values.
- Scoping of issues: Analysis of potential impacts during and post-construction, with each of the directly affected communities and other stakeholders identified in relation to the way they may be affected. Both positive and negative potential issues are identified.
- Identification of impacts: The assessment ultimately appraises the significance of each identified impact based on its duration, extent and sensitivity of impact "receivers."
- Identification of mitigation strategies to manage impacts and enhance benefits of the development.

Overall, the assessment determined that the potential negative amenity and way of life impacts arising from the operation of the facility in the immediate locality can be well managed and mitigated. Provided the impacts associated with construction are well mitigated, the operation of the Eurobodalla Regional Hospital will ensure positive social

outcomes for the broader community. Broader benefits of the investment in this significant new regional scale health facility and associated community infrastructure will be widespread, significant and long term.

The assessment identifies various mitigation measures to be implemented during the construction and operational phases of the development. The mitigation measures are included at **Appendix B**.

6.22 Access

An Access Capability Statement has been prepared by Philip Chun and included at **Appendix DD** to review the capability of the proposed design to meet the requirements of the BCA, Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), relevant Australian Standards as they relate to access to development. Overall, it is considered that the design is generally capable of meeting the relevant requirements, subject to normal design development.

6.23 BCA Compliance

A BCA Report has been prepared by Philip Chun and included at **Appendix U** to review the capability of the proposed design to meet the requirements of the Building Code of Australia 2019 (BCA). Overall, it is considered that the design is generally capable of meeting the deemed to satisfy provisions and performance requirements of the BCA.

7.0 Project Justification

7.1 Ecologically Sustainable Development

The EP&A Regulation lists four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation and pricing of environmental resources.

An analysis of these principles follows.

7.1.1 Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to the project. The proposal will deliver a high standard of ESD outcomes and initiatives at the site, as described above, and will minimise environmental impacts in areas of energy, water, and materials efficiency.

7.1.2 Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The project has been designed to benefit both the existing and future generations by:

- Ensuring the health, diversity and productivity of the environment are maintained through the implementation of passive and active design measures that reduce operational energy and water use from the project.
- Reducing energy, water and waste to ensure that the health, diversity, and productivity of the environment is maintained for the benefit of future generations, including:
 - Reducing greenhouse gas emissions through utilising energy efficient building systems and on-site renewable energy.
 - Minimising water use through rainwater harvesting and reuse for irrigation and through reducing stormwater discharge.
 - Identifying any climate risks on site and incorporating mitigation measures to improve building resilience.
 - Encouraging activity transport uses through the provision of end of trip facilities and secure bicycle parking.
 - Reducing waste during the construction process through using locally sourced materials and by aiming to divert at least 90% of construction waste from landfill.
- Implementing safeguards and management measures to protect environmental values during construction and operation, including reduced waste to landfill and reduced portable water consumption.
- Facilitating job creation in the regions.
- Improving health outcomes of the community.

The project has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

7.1.3 Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration.

The project would not have any significant effect on the biological diversity and ecological integrity of the study area, as addressed in **Section 6.16** above. A detailed Construction Management Plan will also be in place to ensure works do not adversely affect environmentally sensitive parts of the site, including measures to protect the trees which are to be retained.

The project is also in alignment with the NSW Government's Net Zero Plan which aims to achieve net zero emissions by 2050 with a 50% reduction in emissions by 2030, the project is seeking to transition to a fully electric building to eliminate fossil fuel use on site.

7.1.4 Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a project, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

As outlined in the ESD Report (**Appendix Z**), the project will conduct life cycle cost analysis to evaluate cost effective measures to reduce on site operational carbon emissions. A key design criterion of the development also includes the sustainable selection of building systems and materials. Materials are selected based on a life cycle assessment which considers the cradle-to-grave environmental impact of materials. Mechanical, lighting and vertical transportation systems are being designed for low energy consumption and their components will be selected considering whole-of-life costs.

Additional measures will be implemented to ensure no environmental resources in the locality are adversely impacted during the construction or operational phases.

7.2 Likely Impacts of Development

Social and Economic

The social and economic impacts and benefits associated with the proposed development include:

- A development that will provide a significant piece of social infrastructure, increasing the provision and quality of health services within the region. The design and capacity of the development is anticipated to have positive impacts on the overall health outcomes of the region.
- Improves access to an extensive range of health services and facilities for people in the SNSWLHD.
- Provides additional social benefits for the region in terms of providing increased employment opportunities in the area.
- The proposed development is also anticipated to create employment in consultancy, construction and operation.
- Stimulus to economic investment by delivering a key anchor development that will encourage and attract additional allied businesses and uses to the Eurobodalla Regional Hospital campus and surrounding area, including providing co-location benefits with TAFE NSW.
- To not invest in the development would exacerbate the service offering and capacity constraints of the existing health infrastructure in the region.

Biophysical

The environmental impact assessment of the proposed development has demonstrated that:

- The development will not have significant impacts on any threatened flora or fauna species.
- The risks associated with the development are capable of being appropriately mitigated through the mitigation measures outlined in **Appendix B**.

7.3 Suitability of the Site

Having regard to the characteristics of the site and its location in Moruya the proposed development is considered suitable in that:

- The project will transform the use of the existing greenfield site to a hospital which caters to the growing demand for health services within the SNSWLHD.
- The scale, height and form of the proposed building envelope is appropriate for the hospital development and the built form has been designed to minimise any impact to surrounding areas and the public domain.
- The site will have access to all utility services to accommodate the demand generated by the proposed development.
- The local road network and key intersections have been assessed to be able to accommodate the traffic volumes generated by the proposed dwelling yield, without adverse impact on performance or safety.
- The proposed development will not result in any unacceptable or material environmental impacts in relation to adjoining and surrounding properties, particularly in terms of overshadowing, views, privacy and solar access.

7.4 Public Interest

The proposed development is in the public interest for the following reasons:

- The project will increase the capacity of the SNSWLHD to deliver clinical services in order to meet the needs of the local population.
- The project will improve active and public transport connections within the local area through the provision of a bus stop on site and pedestrian paths which connect to the wider pedestrian infrastructure network.
- The proposed redevelopment will provide updated facilities and services in line with the contemporary standards of care.
- The project will reduce the pressure on the existing facilities within the wider SNSWLHD.
- Overall, the project will provide an efficient work environment for staff and a high standard of care and amenity for patients.

8.0 Conclusion

The Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the proposed Eurobodalla Regional Hospital. The EIS has addressed the issues outlined in the SEARs (**Appendix A**) and accords with Schedule 2 of the EP&A Regulation.

Having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The project will facilitate the development of a new state-of-the-art health facility which will further support and strengthen the services and facilities provided within the SNSWLHD.
- The project represents a significant investment in the Eurobodalla region, which will deliver approximately 306 direct jobs during the construction phase and 518 operational jobs at the time of opening.
- The development will support a significant piece of social infrastructure, increasing the number of hospital beds and health workers to Moruya.
- The site allows for the provision of new health facilities that meet the special design requirements for the future proposed uses, whilst not resulting in impacts on surrounding uses that cannot be managed.
- The project will facilitate health uses on the site and is entirely consistent with the NSW State Priorities and relevant strategic planning objectives by providing opportunities for future precinct activation and increased and improved health facilities.
- The project will facilitate the delivery of new landscaped areas and tree planting, as well as retention of trees which have been identified as having Aboriginal significance.
- The assessment of the project has demonstrated that the development will not result in any environmental impacts that cannot be appropriately managed and consistent with the relevant planning controls for the site.
- The project is consistent with the principles of ecological sustainable development as defined by clause 193 of the EP&A Regulation.

Given the merits described above it is recommended that the application be approved subject to conditions requiring the implementation of the mitigation measures outlined at **Appendix B**.