

20 June 2016

The Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally

Dubbo Hospital Redevelopment Stages 3 and 4 Request for Secretary's Environmental Assessment Requirements

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) the purpose of this letter is to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed Stages 3 and 4 Redevelopment of Dubbo Hospital. To support this request, outlined below is an overview of the proposed development, the statutory context, and the key likely environmental and planning issues associated with the proposal.

Background and Recent Development

Dubbo Hospital forms a major component of the Western NSW Local Health District (WNSWLHD), which includes 41 facilities and hospitals generally across the Western NSW and Orana regions.

In February 2013, the then Department of Planning and Infrastructure granted consent for Stages 1 and 2 of the Hospital's redevelopment. The Stages 1 and 2 approval comprised a new building with approximately 9,574m² of additional floor space area, containing the following services, as well as a range of new internal linkages, plant and equipment:

- a new maternity unit;
- operating theatre suite;
- central sterilising department; and
- a day surgery unit.

In addition to the construction of the main building, consent was granted for:

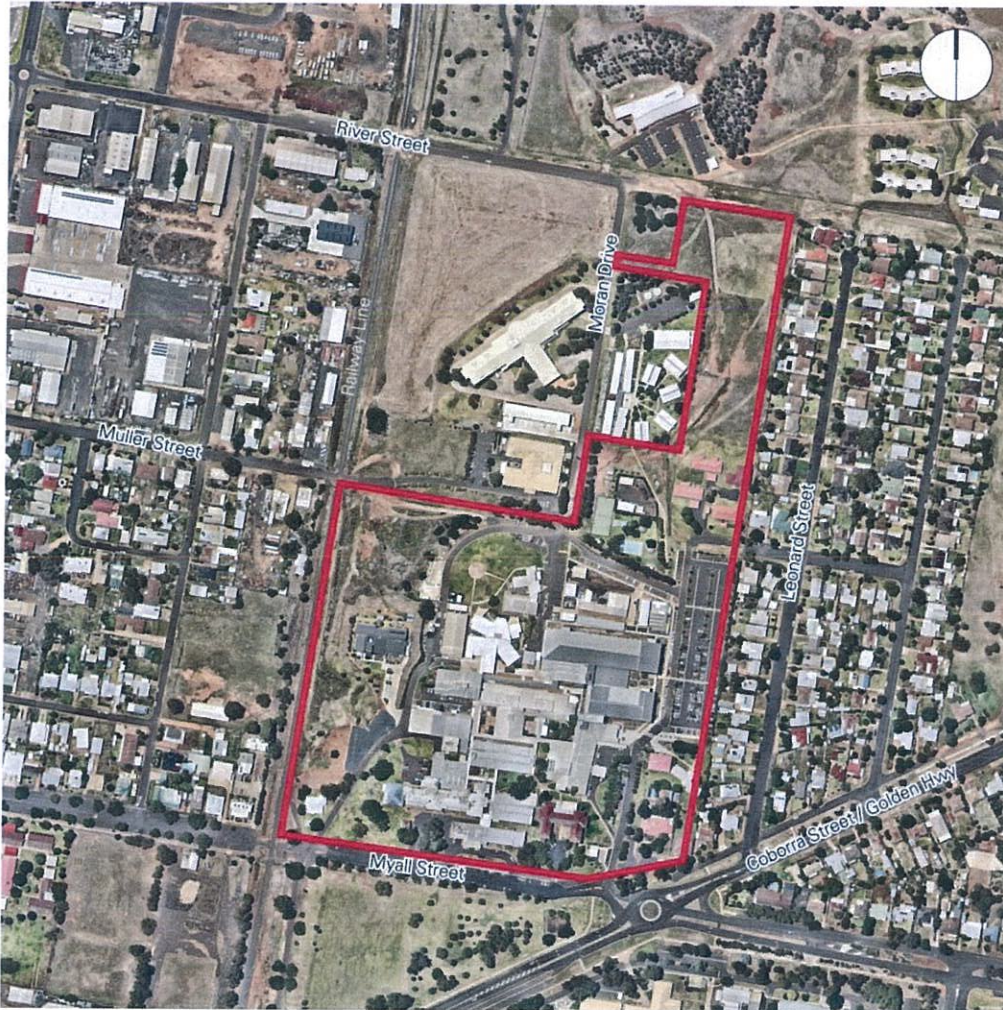
- refurbishment of existing admissions/outpatients and medical records building to accommodate a new front of house area;
- refurbishment of existing theatre building to accommodate an expanded renal dialysis unit;
- demolition of the existing maternity building and construction of new car parking spaces on the footprint of the existing maternity building; and
- provision of new landscaping.

These works are now nearing completion, as shown in the aerial photograph at Figure 1. Notwithstanding the Stages 1 and 2 works, parts of Dubbo Hospital are still lacking in services to enable the provision of quality health care to the region. This is exacerbated by

Health Infrastructure
ABN 89 600 377 397

Level 8, 77 Pacific Hwy, North Sydney NSW 2060
PO Box 1060 North Sydney NSW 2059
Tel. (02) 9978 5402 Fax. (02) 8904 1377
Website: www.hinfra.health.nsw.gov.au

the great variation in the quality of existing building stock, poor building services and a lack of building efficiency. The proposed development seeks to overcome some of these deficiencies, and represents Stages 3 and 4 of the Hospital's masterplan.



 Dubbo Base Hospital Site

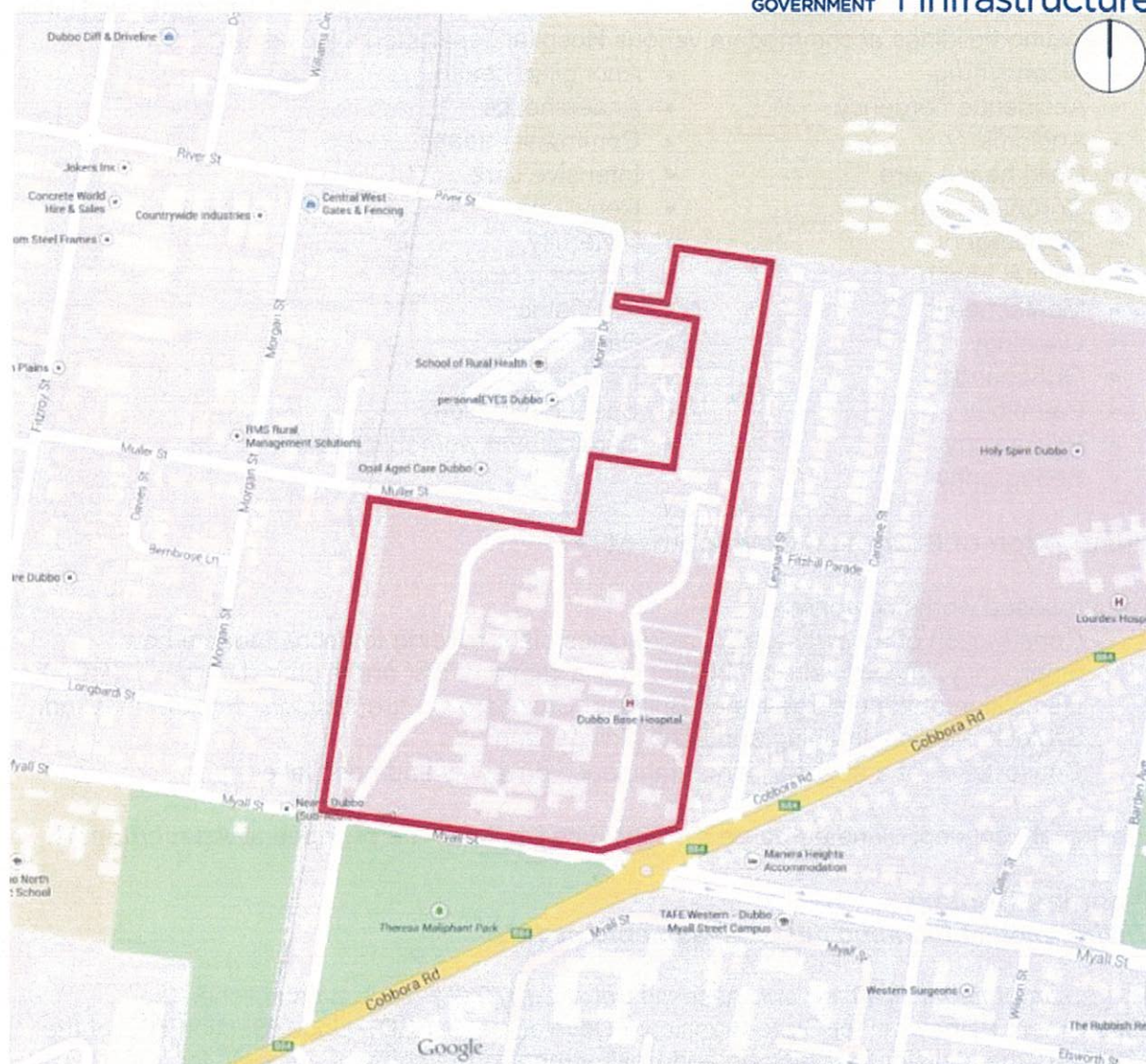
Figure 1 Aerial photograph of the site (December 2015) showing the Stages 1 and 2 works

Source: Nearmap

The Site

Site Location and Context

The Dubbo Hospital is located on the northern fringe of the Dubbo town centre, approximately 1.5km north-east of Dubbo CBD. It is bounded by Myall Street and Cobbora Road to the south, River Street and the Charles Sturt University Campus to the north, Leonard Street to the east and the Coonamble rail line to the west (refer to Figure 2).



 The Site
Figure 2 Locality plan
Source: Google Maps

Site Description

The Dubbo Hospital site is L-shaped and covers an area of approximately 13.48ha. The site is owned by the former Macquarie Area Health Service, now the Western NSW Local Health District, and is legally described as Lot 12 in DP 1159243. The site is zoned SP2 Infrastructure 'Hospital' under Dubbo Local Environmental Plan 2011 (DLEP 2011).

Existing Development

Dubbo Hospital is an existing medical facility, comprising several buildings, including the main single storey Hospital building fronting Myall Street, the two storey building on the corner of Myall Street and Cobbora Road and the Nursing Home fronting Muller Street.



The existing buildings accommodate various Hospital departments including:

- Alcohol/drug
- Accident/emergency
- Audiometry
- Child health care
- Coronary care
- Day surgery
- Mental health
- Mental health
- Oncology
- Orthopaedic
- Pathology
- Psychology
- Sonography
- Aboriginal health
- Anaesthetics
- Community health
- Intensive care
- Renal unit
- Maternity
- Ophthalmology
- Paediatric
- Psychiatric
- Radiology
- Speech pathology
- Surgical and women's health

Description of Proposed Development

The proposed works comprise:

- Construction of a new three (3) storey plus plant building to accommodate new emergency, imagery and ambulatory care departments, and a critical care unit (CCU);
- Demolition of the George Hatch Building, Childcare Centre, Doctors' Accommodation, S-Block, Medical Imaging and ED buildings; and
- Construction of a new car park, ambulance driveway and hospital entry.

Preliminary concept plans prepared by HDR Rice Daubney are provided at **Attachment A**.

Planning Context

Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for State Significant Development (SSD). Under Section 89D of the EP&A Act the Minister for Planning and Environment is the consent authority for SSD. Section 78A(8A) requires that a development application for SSD is to be accompanied by an EIS in the form prescribed by the Regulations.

State Environmental Planning Policy (State and Regional Development) 2011

The State and Regional Development SEPP identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the policy provides that the proposed development as described herein is SSD, as follows:

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 proposal is for the purposes of a hospital, and has a total estimated Capital Investment Value (CIV) in excess of \$30 million, it is considered SSD.

Other Planning Policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SDD application:

- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33);
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55);
- State Environmental Planning Policy Infrastructure 2007 (SEPP Infrastructure); and
- Orana Regional Environmental Plan No 1– Siding Spring (deemed SEPP).

Local Environmental Plan

Dubbo Local Environmental Plan 2011

Table 1 below summarises the key provisions from Dubbo LEP 2011 that apply to the site. These matters will be addressed further as part of the EIS.

Table 1 – Key provisions from Dubbo LEP 2011 Dubbo Local Environmental Plan 2011

Clause 2.2 – SP2 Infrastructure ‘Hospital’	Dubbo Hospital is zoned SP2 Infrastructure ‘Hospital’ in DLEP 2011. Permissible uses in the SP2 zone include <i>“the purpose shown on the Land Zoning Map, including any development that is ordinarily incidental or ancillary to development for that purpose”</i> . As the Stages 3 and 4 works are considered to be part of the main function of the Hospital, the proposed works are permissible.
Clause 4.3 Height of buildings	There is no maximum building height applying to the site.
Clause 4.4 Floor space ratio	There is no maximum FSR applying to the site.
Clause 5.10 Heritage Conservation	The site is identified as containing a heritage item under DLEP 2011. A Heritage Impact Statement will accompany the EIS, and will take into consideration any potential impacts on the site’s significance.
Clause 5.11 Bushfire hazard reduction	The site is not identified on Council’s bushfire prone land map.
Clause 7.1 Flood Planning	No areas within the site are identified as being flood prone on the Flood Planning Maps included in DLEP 2011.
Clause 7.5 Groundwater Vulnerability	The site is identified as having moderate to high groundwater vulnerability (the lowest level of vulnerability). A Groundwater Impact Assessment will accompany the EIS, and will take into consideration any potential impacts on the site’s significance.
Clause 7.7 Airspace operations	There is no obstacle limitation surface (OLS) map, however clause 7.7 provides that: (2) <i>If a development application is received and the consent authority is satisfied that the proposed development will penetrate the Obstacle Limitation Surface, the consent authority must not grant development consent unless it has consulted with the relevant Commonwealth body about the application.</i> (3) <i>The consent authority may grant development consent for the development if the relevant Commonwealth body advises that:</i> (a) <i>the development will penetrate the Obstacle Limitation Surface but it has no objection to its construction, or</i> (b) <i>the development will not penetrate the Obstacle Limitation Surface.</i>

	(4) The consent authority must not grant development consent for the development if the relevant Commonwealth body advises that the development will penetrate the Obstacle Limitation Surface and should not be constructed. (5) The consent authority must not grant development consent for development that will penetrate the Obstacle Limitation Surface unless the consent authority is satisfied that the development will not create an obstruction, hazard or other potential hazard to aircraft accessing the airport (including a hazard or potential hazard relating to light sources or bird strike).
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Preliminary Impact Identification and Risk Assessment

Based on our preliminary environmental assessment, the potential impacts associated with the proposal are summarised below and will be addressed in detail in the EIS.

Heritage

Whilst the whole of the Dubbo Hospital site is identified as a heritage item, as outlined in the extract of the Statement of Significance below, only the main hospital building is identified as having heritage significance:

Dubbo Hospital was built in 1907 and is a marvellous individual Edwardian style building of local historical interest. Architectural and streetscape interest is seriously undermined by additions. Could be greatly improved upon by removal of unsympathetic front additions.

The majority of the proposed Stages 3 and 4 works are separated from the 1907 building, and so will not have any adverse impacts on the site's heritage significance. The demolition of the George Hatch building is not expected to raise any issues from a heritage perspective. The EIS will be accompanied by a Heritage Impact Statement to assess the heritage significance of the site, and any potential impacts associated with the proposed development.

Traffic and parking

Additional parking has been provided as part of the Stages 1 and 2 redevelopment, however it is acknowledged that traffic, and in particular parking, are existing issues on the main Hospital campus. The proposed Stages 3 and 4 works will accommodate additional patient beds and so may increase parking demand on the site.

The proposal accommodates additional parking to cater for this new demand. A traffic and parking study will accompany the EIS. It will assess the parking requirements for the campus, the feasibility and impacts of the proposed circulation and parking changes on the surrounding road network, as well as the functioning of nearby intersections.

Groundwater impacts

The Hospital site is identified as having moderate to high groundwater vulnerability (the lowest level of vulnerability). A Groundwater Impact Assessment was undertaken for the site by Douglas Partners as part of the Stages 1 and 2 redevelopment. The Assessment indicated that groundwater was not encountered within 5 metres of the ground surface. As



the groundwater level is well below the ground surface levels on the site, it was determined that the development would not involve groundwater extraction, and that any groundwater impacts associated with the proposed development would be very low.

Aviation impacts

An Obstacle Limitation Surface (OLS) is defined for Dubbo Airport to ensure flight path and navigation clearance for air traffic. Based on information provided with the Stages 1 and 2 SSD DA, the maximum height of development at Dubbo Hospital under the OLS is between 325m AHD and 340m AHD. Based on an approximate typical surface level at the hospital of 276.5m AHD, the height limit of buildings before penetration of the OLS would be in the order of 63m.

Given the low-rise character of the Hospital campus and the indicative scale of the proposed development, it is not anticipated that the OLS will pose any foreseeable restriction upon development, and the development would not require further CASA approval.

Overall, the impacts of the proposal are minimal as development is largely concentrated within the existing campus. All of the impacts are considered able to be mitigated.

Request for SEARs

The proposed development will enable the continuation of the redevelopment of the Dubbo Hospital, and will further support and strengthen the medical services provided in Western NSW. As the proposal meets the criteria identified in Schedule 1 Clause 14 of the State and Regional Development SEPP with a CIV ie Project Cost (Capital Portion) of approximately \$101,000,000.00, Health Infrastructure formally request that the Department of Planning and Environment issue the Secretary's Environmental Assessment Requirements to facilitate the preparation of the Environmental Impact Statement for Stages 3 and 4 of the Dubbo Hospital redevelopment.

If you require any additional information, please contact Leone McEntee on 0410432505.

Yours sincerely

Sam Sangster
Chief Executive

- NEW CONSTRUCTION - 3 STOREYS
- MEDICAL IMAGING DEPARTMENT
- EMERGENCY DEPARTMENT & AMBULANCE BAY
- AMBULATORY CARE DEPARTMENT & RENAL
- CARDIAC CATH LAB
- CCU & STROKE WARD
- ICU / HDU WARD
- FRONT OF HOUSE, LOBBY & CAFE
- EMERGENCY DEPARTMENT SHORT STAY UNIT



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709	PROJECT DESCRIPTION	710	PROJECT NAME	711	PROJECT LOCATION	712	PROJECT TYPE	713	PROJECT VALUE	714	PROJECT STATUS	715	PROJECT CONTACT	716	PROJECT DATE
717	PROJECT DESCRIPTION	718	PROJECT NAME	719	PROJECT LOCATION	720	PROJECT TYPE	721	PROJECT VALUE	722	PROJECT STATUS	723	PROJECT CONTACT	724	PROJECT DATE
725	PROJECT DESCRIPTION	726	PROJECT NAME	727	PROJECT LOCATION	728	PROJECT TYPE	729	PROJECT VALUE	730	PROJECT STATUS	731	PROJECT CONTACT	732	PROJECT DATE
733	PROJECT DESCRIPTION	734	PROJECT NAME	735	PROJECT LOCATION	736	PROJECT TYPE	737	PROJECT VALUE	738	PROJECT STATUS	739	PROJECT CONTACT	740	PROJECT DATE
741	PROJECT DESCRIPTION	742	PROJECT NAME	743	PROJECT LOCATION	744	PROJECT TYPE	745	PROJECT VALUE	746	PROJECT STATUS	747	PROJECT CONTACT	748	PROJECT DATE
749	PROJECT DESCRIPTION	750	PROJECT NAME	751	PROJECT LOCATION	752	PROJECT TYPE	753	PROJECT VALUE	754	PROJECT STATUS	755	PROJECT CONTACT	756	PROJECT DATE
757	PROJECT DESCRIPTION	758	PROJECT NAME	759	PROJECT LOCATION	760	PROJECT TYPE	761	PROJECT VALUE	762	PROJECT STATUS	763	PROJECT CONTACT	764	PROJECT DATE
765	PROJECT DESCRIPTION	766	PROJECT NAME	767	PROJECT LOCATION	768	PROJECT TYPE	769	PROJECT VALUE	770	PROJECT STATUS	771	PROJECT CONTACT	772	PROJECT DATE
773	PROJECT DESCRIPTION	774	PROJECT NAME	775	PROJECT LOCATION	776	PROJECT TYPE	777	PROJECT VALUE	778	PROJECT STATUS	779	PROJECT CONTACT	780	PROJECT DATE
781	PROJECT DESCRIPTION	782	PROJECT NAME	783	PROJECT LOCATION	784	PROJECT TYPE	785	PROJECT VALUE	786	PROJECT STATUS	787	PROJECT CONTACT	788	PROJECT DATE
789	PROJECT DESCRIPTION	790	PROJECT NAME	791	PROJECT LOCATION	792	PROJECT TYPE	793	PROJECT VALUE	794	PROJECT STATUS	795	PROJECT CONTACT	796	PROJECT DATE
797	PROJECT DESCRIPTION	798	PROJECT NAME	799	PROJECT LOCATION	800	PROJECT TYPE	801	PROJECT VALUE	802	PROJECT STATUS	803	PROJECT CONTACT	804	PROJECT DATE
805	PROJECT DESCRIPTION	806	PROJECT NAME	807	PROJECT LOCATION	808	PROJECT TYPE	809	PROJECT VALUE	810	PROJECT STATUS	811	PROJECT CONTACT	812	PROJECT DATE
813	PROJECT DESCRIPTION	814	PROJECT NAME	815	PROJECT LOCATION	816	PROJECT TYPE	817							

