

6 December 2017

Ms C McNally
Secretary
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally

Lismore Base Hospital Redevelopment - Request for Secretary's Environmental Assessment Requirements (SEARs)

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), Health Infrastructure (HI) request the issue of Secretary's Environmental Assessment Requirements (SEARs) for the State Significant Development (SSD) application for Stage 3C - North Tower Extension (NTX) at Lismore Base Hospital (LBH).

Further, pursuant to section 7.9 (2) of the *Biodiversity Conservation Act 2016*, HI request the Department of Planning and Environment and the Office of Environment and Heritage to consider providing an exemption to preparing a biodiversity development assessment report for the proposal on the basis that the NTX is a vertical extension to an existing building.

1. Site Analysis

Regional Context

The site is located within the catchment of the Northern New South Wales Local Health District (NNSW LHD) which extends from the Clarence Valley in the south to Tweed in the north. The figure below shows the extent of the NNSW LHD.



Figure 1 NSW Health NNSW LHD (Source: NSW Health)

The NNSW LHD comprises two (2) health service groups, being the Byron Tweed Health Service Group (BT HSG) and the Richmond Clarence Health Service Group (RC HSG). LBH is located within the RC HSG and is a major referral hospital in the region.

The high level of specialist services offered by LBH contributes to its significant role in providing health services on a regional level. Some of these services include:

- A formalised Retrieval Service
- Specialist Paediatric Medicine
- Critical Care Services
- Specialist emergency and elective surgical services
- Renal Dialysis and Peritoneal Dialysis procedures and training
- Integrated Cancer Care Centre
- Diagnostic Cardiology
- Mental Health and Drug and Alcohol Services
- High level Radiology
- Teaching Services

These services are offered to a wide area within the region with patient flows extending from LGAs outside of the Richmond Catchment, including the Tenterfield and Byron LGAs.

Local Context

The site is located in Lismore, approximately 1km east of the town centre.

The following figure is a plan showing the location of the site with regard to Lismore town centre.



Figure 2: Location Plan of the Site. Lismore Town Centre marked by the blue star

The North Tower Extension (NTX) Site

This proposal relates the extension of the "north tower", approved as part of Stage 3B (SSDA 6848). The location of this tower can be seen at Figure 3 below, identified as Stage 3B2.

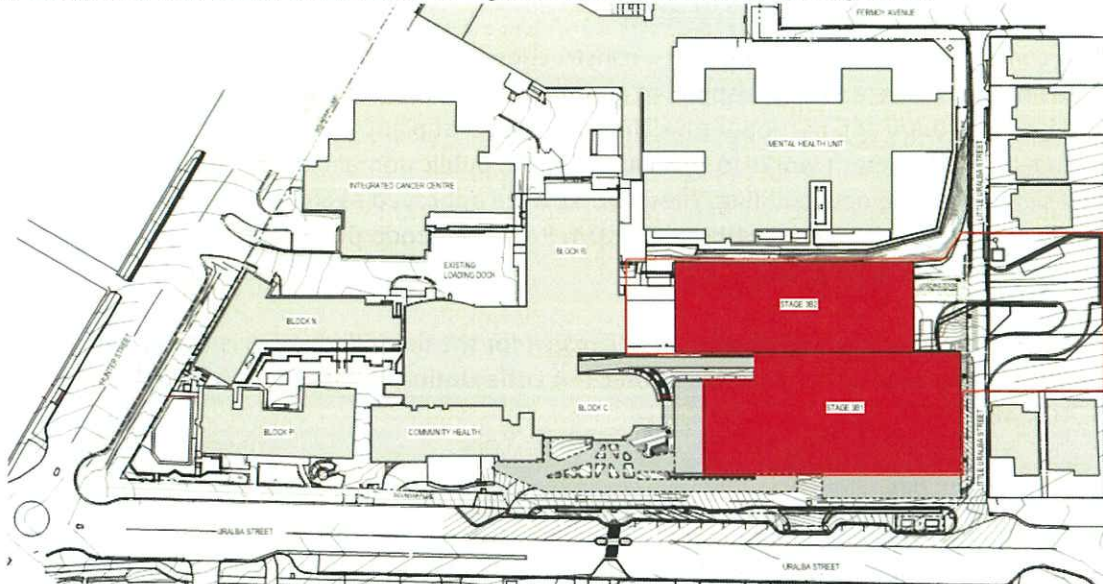


Figure 3: Site Plan showing the specific location of the north tower. (Woods Bagot Drawing No. DA1000)

Legal Description

The NTX development site comprises the following allotments:

- Lot 1 DP 511444;
- Lot 21 DP 589890; and
- Lot 22 DP 589890.

2 Relevant Planning History

The relevant planning history for LBH is outlined below:

Stage 1: MP 06_0078 was approved on 25 January 2007 for a three (3) storey mental health facility with 48 beds at the northern end of the campus. This building has been constructed. This approval also included car parking, vehicular access and landscaping.

Stage 2: MP 07_0136 was approved on 29 October 2008 for a three (3) storey integrated cancer centre with links to the main clinical hospital buildings (Block A) and associated infrastructure and landscaping. This centre has been constructed and is located along Hunter Street on the western boundary. This stage also approved parking.

Stage 3: Stage 3 comprises a range of "sub-stages", including the proposed works.

The relevant parts of Stage 3 that have been approved are below:

Stage 3A early works

"Development without consent" works were approved by HI under Clause 58 of the Infrastructure SEPP for the following:

- Demolition of Block H, Block J and Block T;
- Demolition of car parking within the undercroft area of the mental health unit building (Block Z) and removal of at grade car parking;
- Construction of facilities for the pathology unit within the undercroft of Block Z;

- Construction of temporary facilities for the maternity unit to the east of Block A; and
- Removal of 95 trees and shrubs surrounding the demolished buildings

Stage 3A main building works (SSD 5816)

This comprised site preparation works, construction of a new five (5) storey hospital building with linkages to the existing hospital, to accommodate the emergency department, renal services, mortuary and peri-operative shell and a level of plant above the "shell". Stage 3A also included refurbishment works to Level 4 of Block C, public domain and road works, landscaping and signage for the new building. These works were approved as SSD by the Minister for Planning and Environment on 13 March 2014. It is understood that construction for this stage was completed in June 2016.

Lismore City Council issued development consent for the demolition of existing dwellings, structures and vegetation on 9, 11, 15 and 15A Little Uralba Streets on 7 May 2014 under DA 5.2014.46.1.

Stage 3B main building works and new car park (SSD 6848)

Stage 3B of the redevelopment consists of construction of five additional storeys above the approved five storey Stage 3A building (resulting in a 10 storey building) and a five storey addition to the north of Stage 3A. The Stage 3B works also include site preparatory works, fit-out and expansion of the upper levels of Stage 3A, partial closure of Little Uralba Street for the new loading dock and driveway and construction of a helipad on the roof of the new hospital building. The project had a capital investment value (CIV) of approximately \$114 million. It is understood that the south tower is due for completion in September 2017 and the north tower is due for completion in 2019.

3 Description of Proposed Development

The NTX proposal generally involves the construction and fit out of four (4) new storeys above the existing four (4) storey north tower, the alteration of the existing north tower façade to provide a complimentary façade design across all eight storeys and associated works to facilitate efficient connectivity between existing and proposed portions of the site.

In detail, the proposal will provide:

- Construction of a four (4) storey extension above the existing four (4) storey north tower (to be described as Levels 7 - 10);
- A new ICU providing approximately 16 rooms at Level 8;
- New in-patient accommodation providing approximately 60 beds (net gain of 21 beds in the project) across Levels 9 and 10;
- Additional treatment rooms, staff workstations, staff rooms, offices and meeting rooms across Levels 8 - 10;
- New storage facilities (including sterile storage) across Levels 7 - 10;
- An additional lift well identified as "Lift 7", as well as two additional patient lifts for the north tower;
- Façade changes to north tower Levels 4 - 6;
- New connections between the north and south towers at Levels 7 - 10 and a stairway connecting the north tower roof to Level 12 of the south tower; and
- A generator installed externally at Level 7 of the south tower.

The NTX proposal will increase the existing height of the north tower (approved pursuant to SSD 6848 Mod 3) by approximately 17.126m to a total of approximately 32.726m, with an increase of approximately 3,528.9m² gross floor area (GFA). It should be noted that the NTX does not exceed the height of the South Tower. Architectural plans prepared by Conrad Gargett at Appendix 1 provide further detail.

Operational Need for the NTX Proposal

The proposed works are driven by a need for increased ICU and inpatient facilities at LBH. This need is closely linked to the continued expansion of LBH as a major referral hospital in the RC HSG of the NNSW LHD. In September 2016, a new emergency department (ED) was opened at LBH acting as an entry point to inpatient services. The Healthcare Quarterly released by the Bureau of Health Information (BHI) for January to March 2017 indicated that the number of ED presentations at LBH compared with the same quarter last year has increased by almost 10% (refer to Figure 4).

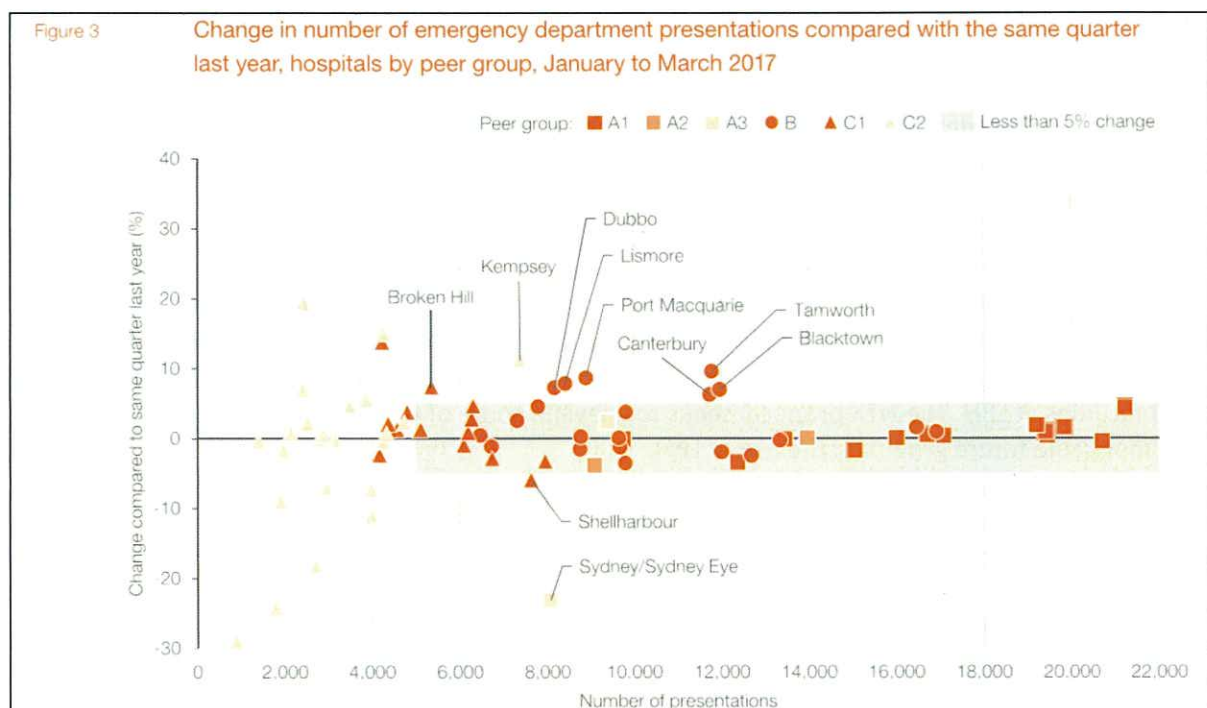


Figure 4: Extract from BHI 'Healthcare Quarterly – January to March 2017' illustrating the "Change in number of emergency department presentations compared with the same quarter last year, hospitals by peer group, January to March 2017". (Source: BHI 2017)

Increased ED presentations at LBH has contributed to a high level of admissions activity. The Healthcare Quarterly for January to March 2017 shows that LBH has the second highest total "episodes" (almost 60% of which were unplanned) and the second highest average length of stay in the NNSW LHD (refer to Figure 5).

Appendix table 1: NSW Hospital admission activity measures by local health district

NSW admitted patient activity by hospital and local health district, January to March 2017.

	All episodes			Acute episodes			
	Total episodes	Planned	Unplanned / other	Same-day	Overnight	Total acute bed days	Average length of stay (days)
Northern NSW Local Health District (NNSWLHD)							
Ballina District Hospital	2,468	1,352	1,116	1,829	483	4,109	1.8
Casino and District Memorial Hospital	600	205	395	258	311	1,593	2.8
Grafton Base Hospital	3,579	1,965	1,614	2,111	1,398	7,169	2.0
Lismore Base Hospital	7,542	3,048	4,494	3,418	3,987	21,943	3.0
Maclean District Hospital	1,243	152	1,091	764	427	2,848	2.4
Murwillumbah District Hospital	1,354	477	877	745	471	2,905	2.4
The Tweed Hospital	8,657	3,054	5,603	3,943	4,551	21,097	2.5
Other NNSWLHD	1,346	189	1,157	497	773	4,051	3.2
Total NNSWLHD	26,789	10,442	16,347	13,565	12,401	65,715	2.5

Figure 5: Extract from "Appendix table 1: NSW Hospital admission activity measures by local health district" from BHI 'Healthcare Quarterly – January to March 2017'. (Source: BHI)

The high level of admissions activity noted above, is accompanied by a large number of elective surgical procedures. In the first quarter of 2017, 34.5% of elective surgeries in the NNSW LHD took place at LBH

The expansion of the north tower is a response to the continued expansion of LBH as a major referral hospital in the RC HSG of the NNSW LHD, characterised by a new and growing ED, a high level of admissions activity and high level elective surgical procedures when compared with other hospitals throughout the NNSW LHD. This has created an increase in demand for inpatient beds and ICU facilities at LBH. The NTX proposal seeks to alleviate some of this demand whilst accommodating for inevitable future growth in the use of LBH.

The operational need identified in this Section is closely linked with the Strategic Planning Context established at Section 5 below.

4 Capital Investment Value

The estimated Capital Investment Value for the proposed work is approximately \$32,154,637 (excl. GST). This figure will be confirmed in a detailed Quantity Surveyors Cost Report that will accompany the application. A preliminary cost estimate report accompanies this application at Appendix 2.

5 Strategic Planning Context

North Coast Regional Plan 2036

The North Coast Regional Plan 2036 (NCRP) was finalised in March 2017, providing the NSW Government's strategy for guiding land use planning decisions for the North Coast region. As seen in Figure 6 below, the plan creates four (4) regional cities and focusses on establishing clear inter and intra-regional connections from these regional cities to surrounding centres, strategic centres and regions.

The NCRP expressly recognises the role of LBH as a "catalyst for growth of the health services industry". The NTX proposal clearly responds to this function by providing additional ICU and inpatient facilities capable of enabling the efficient long-term function of LBH as a major referral hospital in the RC HSG of the NNSW LHD.

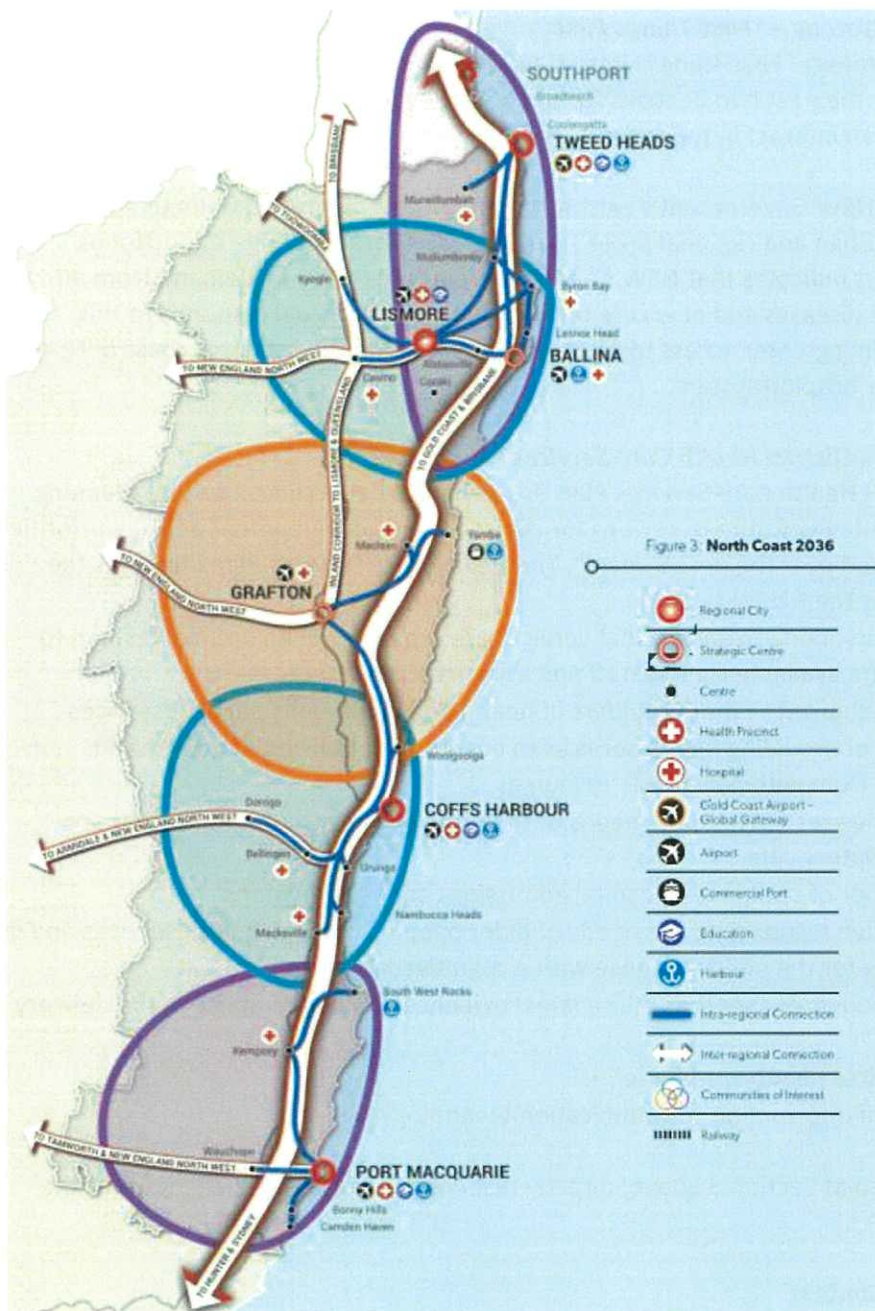


Figure 6: Extract showing North Coast Regional Plan 2036 (Source: North Coast Regional Plan 2036)

NSW State Plan

The NSW Premier has "re-written" the NSW State Plan to sharpen its focus on a dozen "Premier's priorities" and 18 "state priorities". These priorities aim "to grow the economy, deliver infrastructure, protect the vulnerable, and improve health, education and public services across NSW". The proposal will directly contribute to the achievement of three (3) of these priorities by:

- "Building infrastructure";
- "Creating Jobs" throughout construction and operation; and
- "Improving service levels in hospitals".

The State Infrastructure Strategy – “First Things First”

The State Infrastructure Strategy “First Things First” is an assessment of priority infrastructure problems and solutions for the next two decades for the NSW Government, the community, business and all who have an interest in the success of NSW.

The Strategy builds on the NSW Government’s existing public commitments and outlines a forward program of more than 70 urban and regional projects and reforms across a range of portfolios including health. The report indicates that NSW’s health system faces growing demand from an ageing population, lifestyle diseases and new care technologies. The proposal responds to this growing demand by providing greater access to health care services on the far north coast of NSW, reducing the burden on the hospital system.

Northern NSW Local Health District Health Care Services Plan

The Northern NSW (NNSW) Health Care Services Plan "is the highest level clinical service planning document for the LHD", outlining future directions for clinical service development and key priorities that need to be implemented over the next 5 years". The Health Care Services Plan identifies the following key challenges for the NNSW LHD:

- Utilising clinical networking to ensure that services are organised in an optimal fashion to make best use of the available clinical staff and infrastructure resources
- Working in partnership with other providers of health and community support services
- Managing the cost of providing health services to ensure the provision of quality and accessible services from within available resources
- Providing an effective response to the needs of the population with conditions that are amenable to ambulatory care
- Reducing the number of unplanned hospital admissions and readmissions
- Providing an effective response to the needs of older people across all health services and in particular providing for the needs of those with a cognitive impairment
- Introducing new models of care that utilise latest evidence and best practice in the delivery of healthcare
- Ensuring a sustainable health workforce
- Ensuring best use of information communication technology."

The NTX proposal, described at Section 3 above, directly responds to these key challenges for the NNSW LHD.

6 Statutory Planning Context***Lismore Local Environmental Plan 2012***

The Lismore Local Environmental Plan (LLEP) 2012 is the primary Environmental Planning Instrument (EPI) that applies to the site. As can be seen in the figure below, the site is zoned SP2 Infrastructure and is surrounded by land zoned R3 Medium Density Residential.

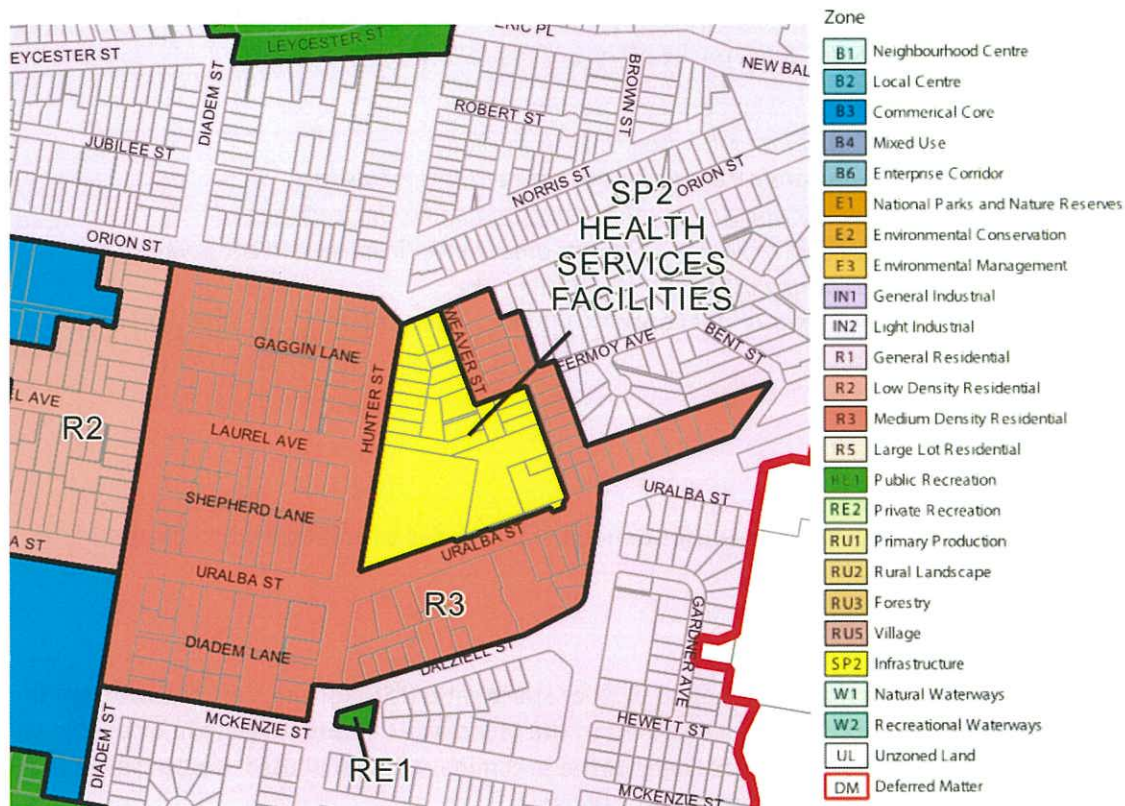


Figure 7: Zoning Map Extract, site marked in yellow (Source: LLEP 2012: Land Zoning Map – Sheet LZN_005AB)

Objectives and Permissibility

The Objectives of the SP2 zone are

- To provide for infrastructure and related uses.
- To prevent development that is not compatible with or that may detract from the provision of infrastructure.

The proposed works aim to enhance the site's existing hospital use and are therefore consistent with the objectives of the SP2 zone.

The LLEP defines a "hospital" within a broader definition of "health services facility". The definitions of these uses are extracted below.

health services facility means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following:

- a medical centre,*
- community health service facilities,*
- health consulting rooms,*
- patient transport facilities, including helipads and ambulance facilities,*
- hospital.*

hospital means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to

people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following:

- (a) day surgery, day procedures or health consulting rooms,
- (b) accommodation for nurses or other health care workers,
- (c) accommodation for persons receiving health care or for their visitors,
- (d) shops, kiosks, restaurants or cafes or take away food and drink premises,
- (e) patient transport facilities, including helipads, ambulance facilities and car parking,
- (f) educational purposes or any other health-related use,
- (g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),
- (h) chapels,
- (i) hospices,
- (j) mortuaries."

The proposed NTX is consistent with the uses defined above and is permissible with consent in the SP2 Zone.

Development Standards

The LLEP does not provide a maximum height or floor space ratio (FSR) for the site. Notwithstanding this, preliminary consideration has been provided to the objectives Clauses 4.3 (Height of buildings) and 4.4 (Floor space ratio) of the LLEP throughout the preliminary design phases. Responses to the relevant objectives are detailed in Tables 1 and 2 below.

Table 1: Response of the proposal to the height objectives in Clause 4.3 of the LLEP

Height Objective	Response
To establish a maximum height for buildings,	Not applicable as no maximum height applies under the LLEP.
To provide for taller buildings in the city centre and to enable a transition in building height in response to varying urban character and function	Although the boundaries of the "city centre" are unclear, the proposal provides for a bulk and scale that is compatible with the urban character and function of the site.
To protect the amenity of neighbouring properties and public places, with particular regard to visual bulk, scale, overshadowing, privacy and views	A preliminary review of potential amenity impacts relating to neighbouring properties suggests that they will be minor. The visual bulk and scale of the proposal will be complimentary to the existing south tower building.

Table 2: Response of the proposal to the FSR objectives in Clause 4.4 of the LLEP

FSR	Objectives Response
To establish the maximum site density for new development	Not applicable as no maximum FSR applies under the LLEP
To ensure that the scale and bulk of development does not have an unacceptable or adverse impact on streetscape and the character of the area in which the development is located	As noted in Table 1 the visual bulk and scale of the proposal will be complimentary to the existing south tower building and will not be visible from the south due to the location of the south tower. On this basis, a preliminary assessment of the NTX proposal indicates that it will not have an unacceptable or adverse impact on streetscape and the character of the area

Heritage

The site does not comprise any heritage or archaeological items and is not within a heritage conservation area. However, as seen in the Figure 8 below, the site is located within the vicinity of a local heritage item, being listing I67, known as Armstrong House ("Kiaora") at 83A Uralba Street.



Figure 8: Heritage Map Extract, site marked by the red star (Source: LLEP 2012: Zoning Map Extract, site marked by the red star (Source: LLEP 2012: Land Zoning Map - Sheet LZN_005AB)

Under the provisions of Clause 5.10 of the LLEP, the consent authority may, prior to granting consent, require a heritage management document which assesses the impact of a development on heritage items within the vicinity of the development site. Further consideration of heritage is provided at Section 7 below.

Infrastructure development and use of existing buildings of the Crown

Clause 5.12 of the LLEP 2012 relates to "Infrastructure development and use of existing buildings of the Crown". Clause 5.12 of the LLEP 2012 states:

- (1) *This Plan does not restrict or prohibit, or enable the restriction or prohibition of, the carrying out of any development, by or on behalf of a public authority, that is permitted to be carried out with or without development consent, or that is exempt development, under State Environmental Planning Policy (Infrastructure) 2007.*
- (2) *This Plan does not restrict or prohibit, or enable the restriction or prohibition of, the use of existing buildings of the Crown by the Crown.*

This clause applies to the NTX proposal at LBH.

Airspace operations

An Obstacle Limitation Surface ("OLS") is defined for Lismore Airport to ensure flight path and navigation clearance for air traffic. Clause 6.5 of the LLEP states that if a development penetrates the OLS, consultation with "the relevant Commonwealth body" is required prior to granting consent. Further consideration of airspace operations is provided at Section 7 below.

Essential services

Clause 6.9 of the LLEP states that consent must not be granted to development unless the consent authority is satisfied that the services are available or that adequate arrangements have been made to make them available when required. Further consideration of essential services is provided at Section 7 below.

7 Preliminary Site Investigations Carried Out to Date

Based on preliminary site investigations, the potential impacts associated with the proposal are summarised below and will be addressed in detail by the future SSD Application.

Visual Bulk and Scale

The NTX proposal will increase the height of the north tower (as currently approved pursuant to SSD 6848 Mod 3) by approximately 17.126m to a total of approximately 32.726m with an increase of approximately 3,528.9m² GFA. The north tower will comprise a total of eight (8) storeys and will directly adjoin the existing 10 storey south tower. Views toward the existing south tower from the surrounding locality are illustrated at Figures 9-12 below.



Figure 9: View of the south tower from the corner of Hunter Street and Orion Street (Source: Google Street View December 2015)



Figure 10: View of the south tower from near the corner of Hunter Street and Laurel Avenue (Source: Google Street View December 2015)



Figure 11: View of the south tower from near the corner of Hunter Street and Uralba Street (Source: Google Street View September 2016)

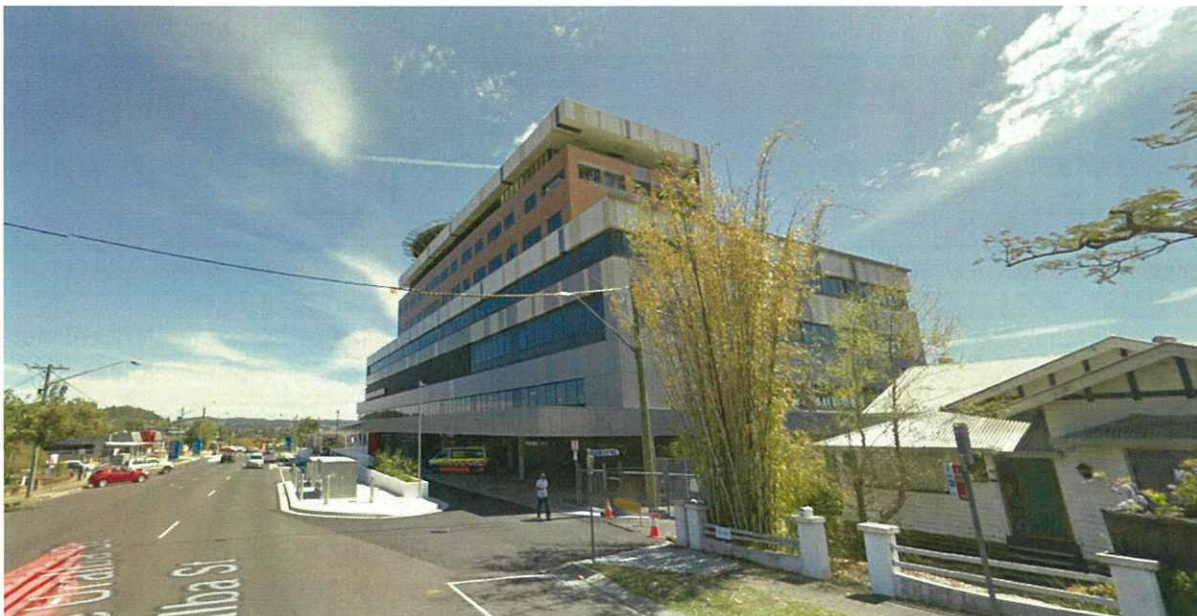


Figure 12: View of the south tower from near the corner of Uralba Street and Dibbs Street (Source: Google Street View September 2016)

The visual impact of the NTX will be largely mitigated by the location and materials of the existing south tower. In this respect, the following matters are noted:
Only oblique views of the north tower will be available from the south and west due to the location of the existing south tower.

The north tower will be visible from the northern end of Hunter Street and partially visible from Orion Street, Weaver Street and Fermoy Avenue. As can be seen in Figures 9 and 10 above, these views will be attained from distances ranging between 100m and 250m from the north tower site. The visual impact of the NTX from the north of the site will not be tangibly different to existing views of the south tower due to the application of similar façade treatments and the proximity of the two buildings.

Visual and shadow impact of the proposal on dwellings at Little Uralba Street will be considered in detail by the EIS. However, a review of the shadow analysis that accompanied the Part 3B EIS, extracted at Figure 13 below, suggests that the NTX will not have any unreasonable impact on surrounding dwellings and the majority of addition shadow affectation is likely to occur at the existing loading dock access point at 9, 11, 15 and 15A Little Uralba Street.

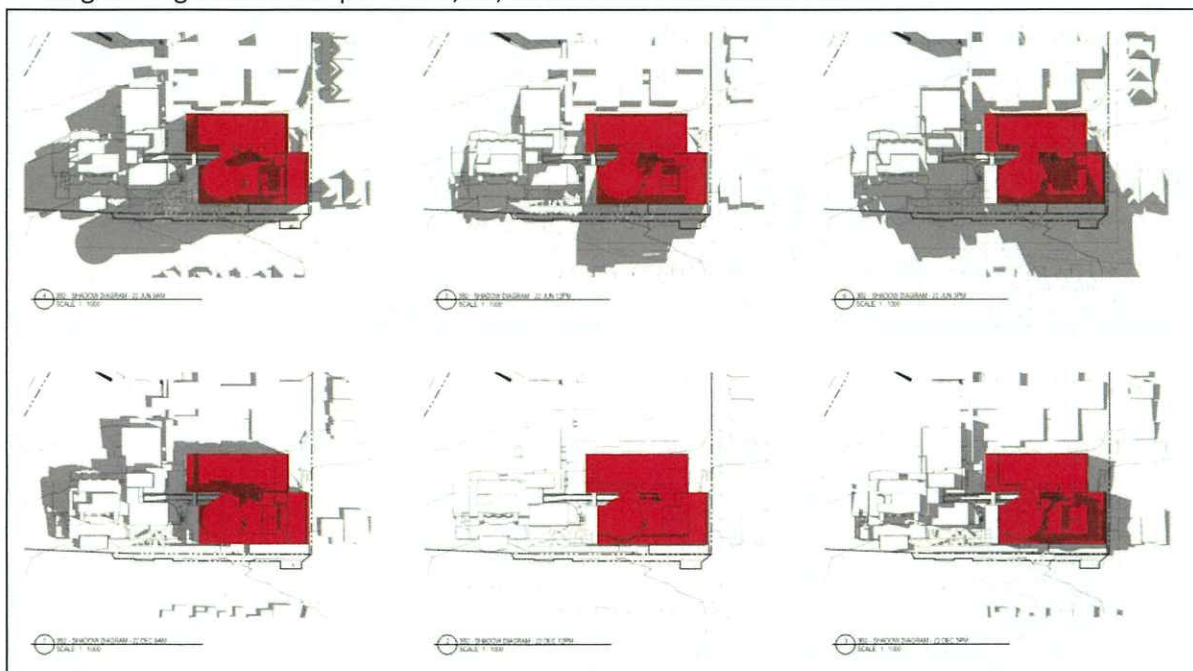


Figure 13: Extract of shadow diagrams accompanying the Part 3B EIS for the site (Source: Woods Bagot).

Based on the matters noted above, the preliminary site investigation indicates that the NTX will not have any major or unreasonable visual or amenity impacts on the surrounding locality. These matters will be investigated in detail as part of the EIS submission.

Heritage

As noted above the site is located within the vicinity of a local heritage item, being listing I67, known as Armstrong House ("Kiaora") at 83A Uralba Street. A HIS was submitted as part of the SSDA for Stage 3B. The relevant conclusions of the HIS for Part 3B are extracted below.

"It is further considered by City Plan Heritage that the proposed additional levels and new carpark will be negligible and will have no adverse impact on the assessed heritage significance of the existing hospital buildings, dwellings within the carpark site, streetscape views, or to Armstrong House. The increased height of the buildings have been suitably setback and articulated as not to dominate or otherwise negatively impact the streetscape."

The proposed new height of the development, although would make a notable difference to the present day streetscape presentation and character of its immediate streetscapes, considers the visual impact on the general character of the area, including Armstrong House. There will be no additional impact on the identified significant views and vistas of this heritage item. Likewise, the design of the carpark is suitably set into the existing topography of the site so as not to have any significant visual impact on Armstrong House. It has been designed in an architecturally pleasant manner and does not present as an intrusive utilitarian building."

It is unlikely that the NTX proposal would alter the above conclusion in any way. Figure 14 demonstrates that that only minor oblique views of the NTX would be available from Armstrong House.



Figure 14: View of the south tower construction from Armstrong House at the south-eastern corner of Uralba Street and Dibbs Street (Source: Google Street View December 2015)

Traffic and Parking

As the proposed addition will only result in an additional 21 beds across the hospital, the traffic impact of the proposal will not adversely impact on the surrounding traffic network and existing parking arrangements. As such, we propose to review the previous Traffic and Parking Report for Stage 3B and provide a supporting letter to assess the traffic and parking impacts of the proposal. Confirmation of this would be appreciated in the SEARs.

Noise and Vibration

An Acoustic Report prepared by Acoustic Logic was submitted with the previous DA for Stage 3B at Lismore Hospital. This report assessed the noise and vibration impacts of the full structure (including the NTX and the noise generated by the Westpac rescue helicopter service) on the amenity of residential uses nearby. As the previous report is still up to date, we propose to review the report and provide an updated statement to support the recommendations. Confirmation of this would be appreciated in the SEARs.

Airspace operations

The maximum height of development at LBH under the OLS is understood to be RL 54.5 (as nominated in the EIS for Stage 3B). Clause 6.5 of the LLEP states that if a development penetrates the OLS, consultation with "the relevant Commonwealth body" is required prior to granting consent. In this instance, the relevant body is CASA. The maximum height of the proposed NTX is RL 61.78 and will therefore penetrate the OLS.

Infrastructure and servicing

The site is adequately serviced with potable water, sewer, stormwater, electricity and telecommunications services. Consultation will be undertaken with all relevant service providers in relation to any required capacity augmentation of existing services to the site.

8 Consultation

Consultation will be required with various stakeholders in relation to the NTX proposal at LBH. In the preparation of the EIS consultation will be undertaken with relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular, consultation will be carried out with Lismore Council, Transport for NSW and Roads and Maritime Services. The EIS will describe the consultation process and the matters raised, and identify where the design of the development has been amended in response to any such matters.

To date, only preliminary consultation has been had with Lismore Council in relation to the application.

9 Request for Secretary's Environmental Assessment Requirements

On the basis that the proposal falls within the criteria identified in Schedule 1 of the SRD SEPP, including a CIV in excess of \$30 million, Health Infrastructure formally request that the Department of Planning and Environment issue the Secretary's Environmental Assessment Requirements (SEARs) to facilitate the preparation of the Environmental Impact Statement to accompany the concept SSD application for the NTX at LBH.

Further, given that the proposal involves an increase in height of an existing building, HI also seek a waiver from the requirements of the *Biodiversity Conservation Act 2016* in accordance with Section 7.9 of that Act.

If further information is required, please contact Leoné McEntee on 99785420 or 0410432505

Yours sincerely



Sam Sangster
Chief Executive

Att: Appendix A

Proposed Plans