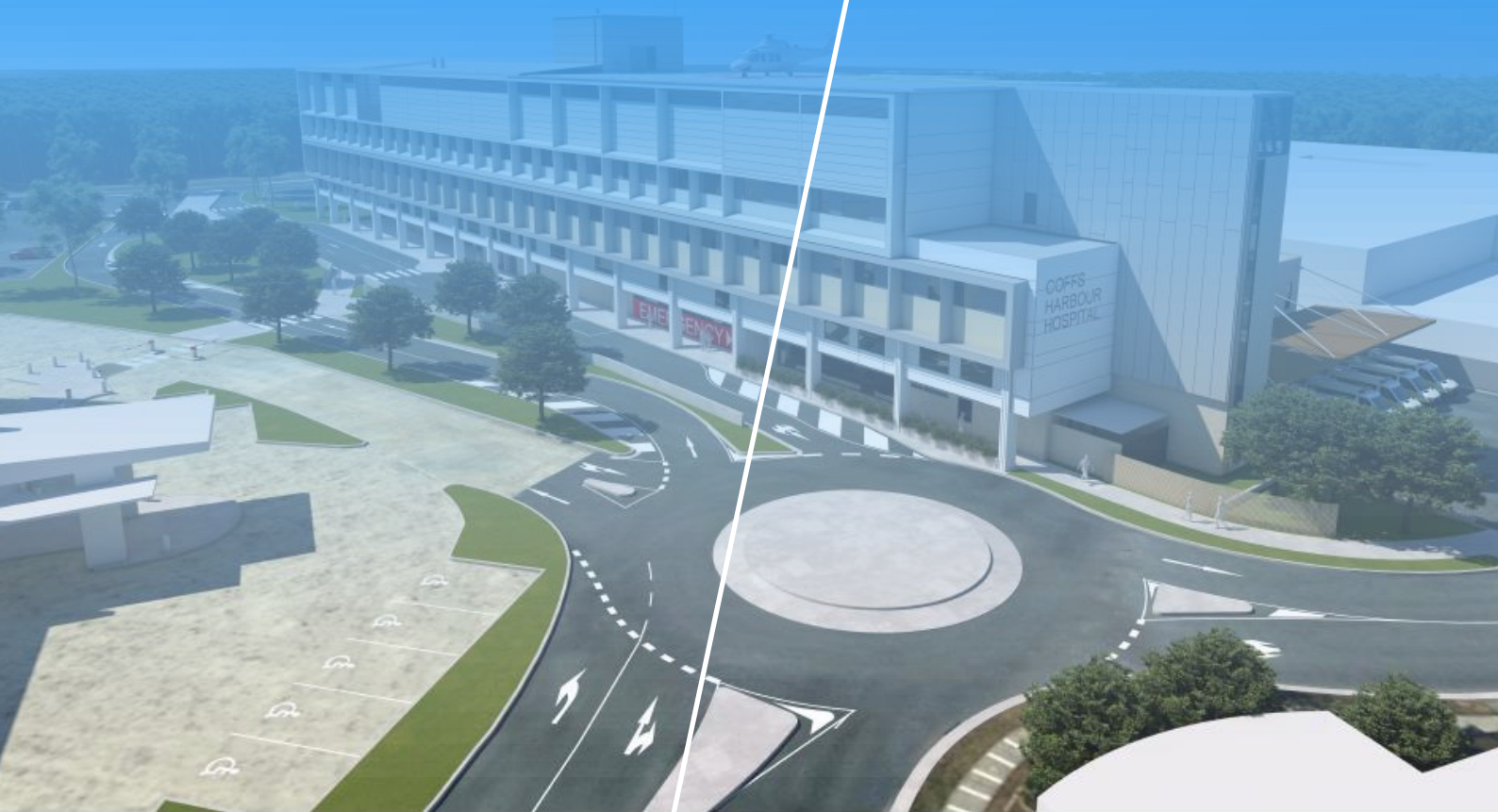




Coffs Harbour Hospital Expansion

*State Significant
Development Assessment
(SSD 8981)*



February 2019

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Cover photo

Photomontage of Coffs Harbour Hospital Expansion (Source: Applicant's RtS 2018)

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Glossary

Abbreviation	Definition
AHA	Aboriginal Heritage Assessment
AHD	Australian Height Datum
ASSMP	Acid Sulphate Soil Management Plan
AST	Aboveground Storage Tank
BC Act	<i>Biodiversity Conservation Act 2016</i>
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
BFHA	Bushfire Hazard Assessment
Coastal SEPP	State Environmental Planning Policy (Coastal Management) 2018
CEMP	Construction Environmental Management Plan
CHH	Coffs Harbour Hospital
CHHC	Coffs Harbour Health Campus
CHLEP	Coffs Harbour Local Environmental Plan 2013
CIV	Capital Investment Value
Consent	Development Consent
Council	Coffs Harbour City Council
CSB	Clinical Services Building
Department	Department of Planning and Environment
DPI	Department of Primary Industries
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
FIA	Flood Impact Assessment
FRNSW	Fire and Rescue NSW
GANSW	Government Architect NSW
LEP	Local Environmental Plan
LGA	Local Government Area
mbgs	Metres Below Ground Surface
Minister	Minister for Planning

Abbreviation	Definition
MNCLHD	Mid North Coast Local Health District
NPI	NSW Noise Policy for Industry 2017
OEH	Office of Environment and Heritage
PBP	Planning for Bushfire Protection
PCA	Preliminary Contamination Assessment
PMF	Probable Maximum Flood
REF	Review of Environmental Factors
Regional Plan	North Coast Regional Plan 2036
RMS	Roads and Maritime Services
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning and Environment or nominee
SEPP	State Environmental Planning Policy
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
VIA	Visual Impact Assessment



Executive Summary

Introduction

NSW Health Infrastructure (the Applicant) has lodged a development application (DA) and accompanying Environmental Impact Statement (EIS) seeking consent for the expansion of the Coffs Harbour Hospital (CHH) at 345 Pacific Highway, Coffs Harbour within the Coffs Harbour City Local Government Area (LGA).

The site is located approximately 3 kilometres (km) south-west of the Coffs Harbour town centre and covers approximately 25 hectares (ha) of SP2 Infrastructure (Health Services Facility) zoned land.

The Applicant's original proposal included the new main hospital entrance and reception area within the eastern part of the Clinical Services Building's ground floor only and the areas to the west of the main entrance were reserved for future expansion (see **Figure 1**).

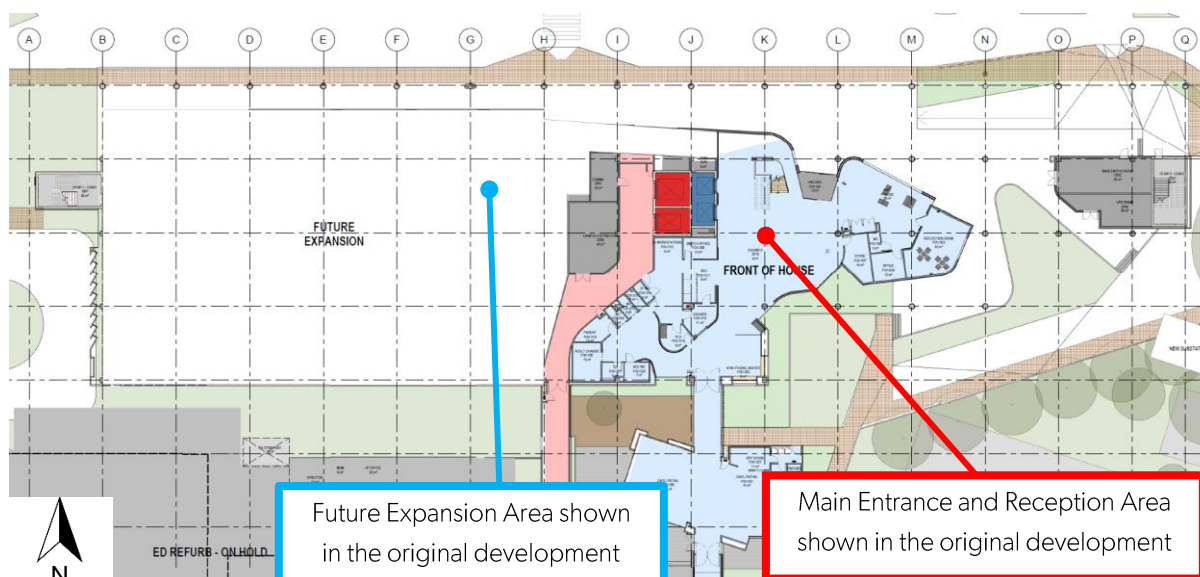


Figure 1 | Original Proposal included in the EIS

In the Response to Submissions (RtS), the Applicant amended the proposal to include a revised five-storey Clinical Services Building (CSB) containing a new Emergency Department and associated satellite medical imaging room on the ground floor which occupies the originally identified future expansion area (see **Figure 2**).

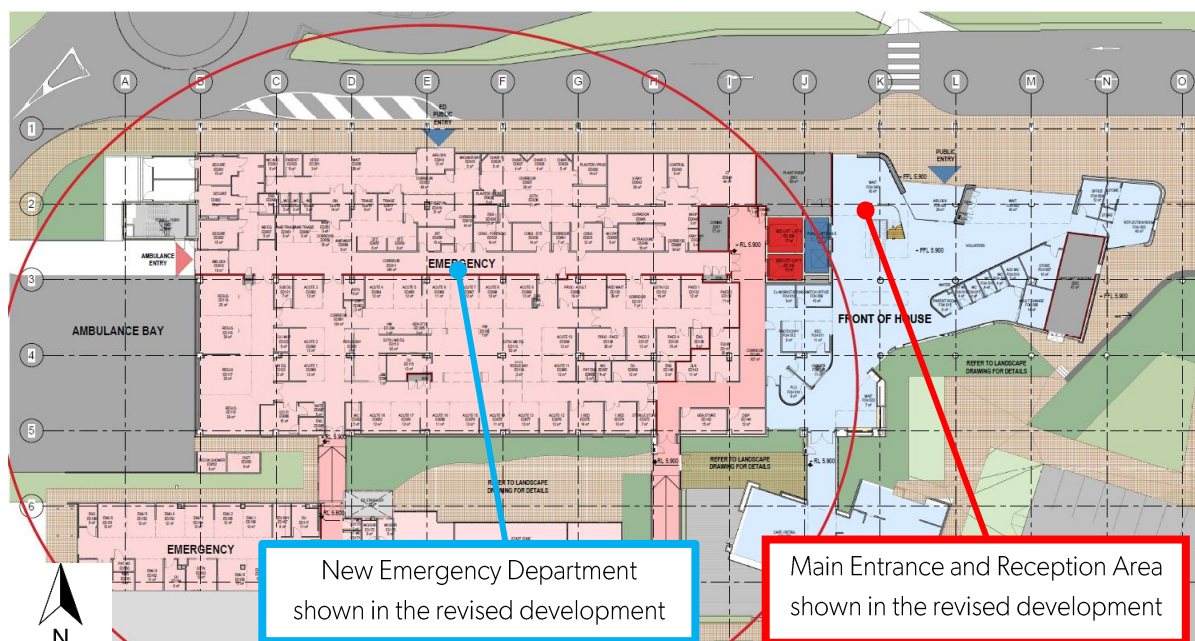


Figure 2 | Revised Development included in the RtS

Amended Proposal

In response to the community's needs for an efficient emergency medical service and an expanded Intensive Care Unit (ICU) at the CHH, the Applicant submitted a request to amend the development as part of the Response to Submissions (RtS) in accordance with Clause 55 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). The Department reviewed the request and concluded the amended development would allow the CHH to meet the growing demands for a modern public hospital from the Mid North Coast Region and support the CHH's role as a regionally significant health service provider. The Department is satisfied the Applicant has addressed the requirements of Clause 55 of the EP&A Regulation and agrees to the amendment.

The amended proposal (the development) includes construction of a new five-storey CSB with a rooftop helipad, refurbishment of the existing hospital Main Building A (MBA) and construction of a new bus stop. Additional ancillary works include landscaping, business identification and wayfinding signage and associated civil works are also proposed. The development will increase the CHH bed capacity from 321 to 440 beds representing a net increase of 121 beds.

The development has a capital investment value of \$120 million and is expected to generate 290 construction jobs and an additional 330 full-time equivalent operational jobs.

Besides the above components, infrastructure works including reconfiguration of the car park, works to the existing Coffs Harbour Health Campus (CHHC) internal roads, stormwater system diversion and augmentation, construction of a canopy over temporary ambulance bays and tree removal also forms part of the proposed expansion of the CHH. However, these infrastructure works do not form part of the State significant development and have been approved by the Applicant under a Review of Environmental Factors (REF) (15/2018) and subsequent modification (15/2018/A) under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in June and August 2018 respectively.

The development is classified as State significant development (SSD) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it involves construction and operation of a hospital with a Capital Investment Value (CIV) greater than \$30 million that meets the criteria in Clause 14 of Schedule 1 in State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). Consequently, the Minister for Planning is the consent authority for the development under section 4.5(1) of the EP&A Act.

Engagement

The Department of Planning and Environment (the Department) exhibited the EIS for the development from 5 July 2018 until 1 August 2018. A total of 12 submissions were received, including 11 from government authorities and Council and one from a special interest group.

Key concerns raised in the submissions relate to built form and landscaping, traffic and parking and flooding impacts. The Applicant submitted a Response to Submissions (RtS) on 18 October 2018 to address and clarify matters raised in the submissions. The RtS included amendments to the original proposal as described above. The Department reviewed the RtS in consultation with Council and the government agencies.

After reviewing the RtS including the revised proposal, Council and the Government Architect NSW (GANSW) reiterated their comments on built form and urban design, traffic and parking and flooding impacts. On 21 November 2018, the Applicant submitted a RtS Addendum responding to the comments made by Council and GANSW. The Department invited the relevant public authorities to provide comments on the RtS Addendum to advise whether it addressed their comments.

Council advised it was satisfied the development would not have a significant impact on the surrounding road network and any outstanding parking issues can be addressed through the recommended conditions of consent. However, Council remained concerned about the potential flooding impacts of the development and flood emergency plan outlining management measures responding to and recovering from flooding events. The GANSW advised that it remained concerned regarding the built form and public domain design.

Assessment

The Department has considered the merits of the revised development in accordance with relevant matters under Section 4.15(1) and the objects of the EP&A Act, the principles of Ecologically Sustainable Development, issues raised in all submissions, as well as the Applicant's responses to these issues. The Department identified the key issues of the assessment to be built form and urban design, traffic and parking impacts and flooding. These issues are discussed in detail in Section 6.

The Department considers the proposed building design would appropriately fit within the site context without having an adverse impact on the character of the locality. The development includes sufficient parking spaces to meet the estimated parking demands from patients, visitors and employees. The additional traffic generated by the development would not adversely impact on the efficiency and safety of the local road network. The flooding impacts caused by the development could be entirely held within the CHHC site boundaries. During Probable Maximum Flood (PMF) events, Phil Hawthorne Drive could provide emergency access for the expanded CHH. To mitigate the flooding impacts, the Department has recommended a number of conditions to ensure the new CSB would be designed and constructed with adequate mitigation measures in the event of a flood including during a PMF event.

The Department's assessment concluded the impacts of the development could be mitigated and/or managed to ensure an acceptable level of environmental performance, subject to the stringent recommended conditions requiring the Applicant prepare and implement a range of environmental management plans for construction and operation of the development. In summary, the development would:

- be compatible with the scale and form of the locality
- generate traffic that could be accommodated on the local and regional road network without any significant impacts on safety, capacity or efficiency
- include sufficient parking provisions meeting growing parking demands from patients, employees and visitors
- cause minor impacts on flood behaviours which would be entirely accommodated within the site boundaries

- facilitate a modern health care facility and upgrade the existing facility which would enhance the ability of CHH to deliver modern health care in a regional setting
- create 290 construction jobs and 330 full-time equivalent operational jobs
- be an anchor project which will enhance the role of CHH as a regional health care hub and facilitate future expansion opportunities.

The Department considers the development is in the public interest and recommends that the application be approved subject to conditions requiring further mitigation and management measures.



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1. Introduction

1.1 The Department's Assessment

This report details the Department of Planning and Environment's (the Department) assessment of a State significant development application (SSD 8981) for the proposed expansion of the Coffs Harbour Hospital (CHH). The Department's assessment considers all documentation submitted by NSW Health Infrastructure (the Applicant), including the Environmental Impact Statement (EIS) and the amended application and Response to Submissions (RtS), submissions received from government authorities, stakeholders and the special interest group. The Department's assessment also considers the legislation and planning instruments relevant to the site and the development.

This report describes the proposed development (the development), surrounding environment, relevant strategic and statutory planning provisions and the issues raised in submissions. The report evaluates the key issues associated with the development and provides recommendations for managing any impacts during construction and operation. The Department's assessment has concluded that the development is in the public interest and should be approved, subject to conditions.

1.2 Development Background

The Applicant is seeking development consent to expand the Coffs Harbour Hospital (CHH) in the Coffs Harbour City Local Government Area (LGA).

The Applicant's original proposal included the new main hospital entrance and reception area within the eastern part of the proposed Clinical Services Building (CSB) ground floor only and the areas to the west of the main entrance were reserved for future expansion.

During the preparation of the Response to Submissions (RtS), the Applicant identified the community's needs for improving the Emergency Department's performance and an upgrade to the Intensive Care Unit (ICU) at the CHH. The Applicant therefore submitted a request to amend the development in accordance with Clause 55 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). The amendment included a revised five-storey Clinical Services Building (CSB) containing a new Emergency Department and associated satellite medical imaging room on the ground floor occupying the originally identified future expansion area.

The Department reviewed the Applicant's request and concluded the revised CSB would support the sustainable growth of the CHH to meet the increasing demands for an uplifted health service facility in the Mid North Coast Region and is consistent with the CHH's role as a regionally critical health service provider. The Department is satisfied the Applicant has adequately addressed the requirements of Clause 55 of the EP&A Regulation and agrees to the amendment.

The amended development includes:

- construction of a new five-storey Clinical Services Building (CSB) with rooftop helipad
- refurbishment of the existing Main Building A (MBA)
- relocation of the Emergency Department in the new CSB
- associated landscaping, infrastructure and service works.

The hospital currently has 319 beds and provides specialist medical and surgical services to the community. The Applicant advised that presently the hospital is unable to meet projected population growth and there is an increased need for acute, sub-acute and mobile health services.

1.3 Site Description

The site comprises approximately 25 hectares (ha) of SP2 Infrastructure (Health Services Facility) zoned land located at 345 Pacific Highway, Coffs Harbour (see **Figure 3**) known as the Coffs Harbour Health Campus (CHHC). The site is legally described as Lot 205 in Deposited Plan (DP) 1206854 and Lot 14 in DP 261222. The site is approximately 3 kilometres (km) south-west of the Coffs Harbour town centre. The CHHC is irregular in shape and slopes down from the central part of the site towards Newports Creek to the north and a native vegetation reserve to the south.

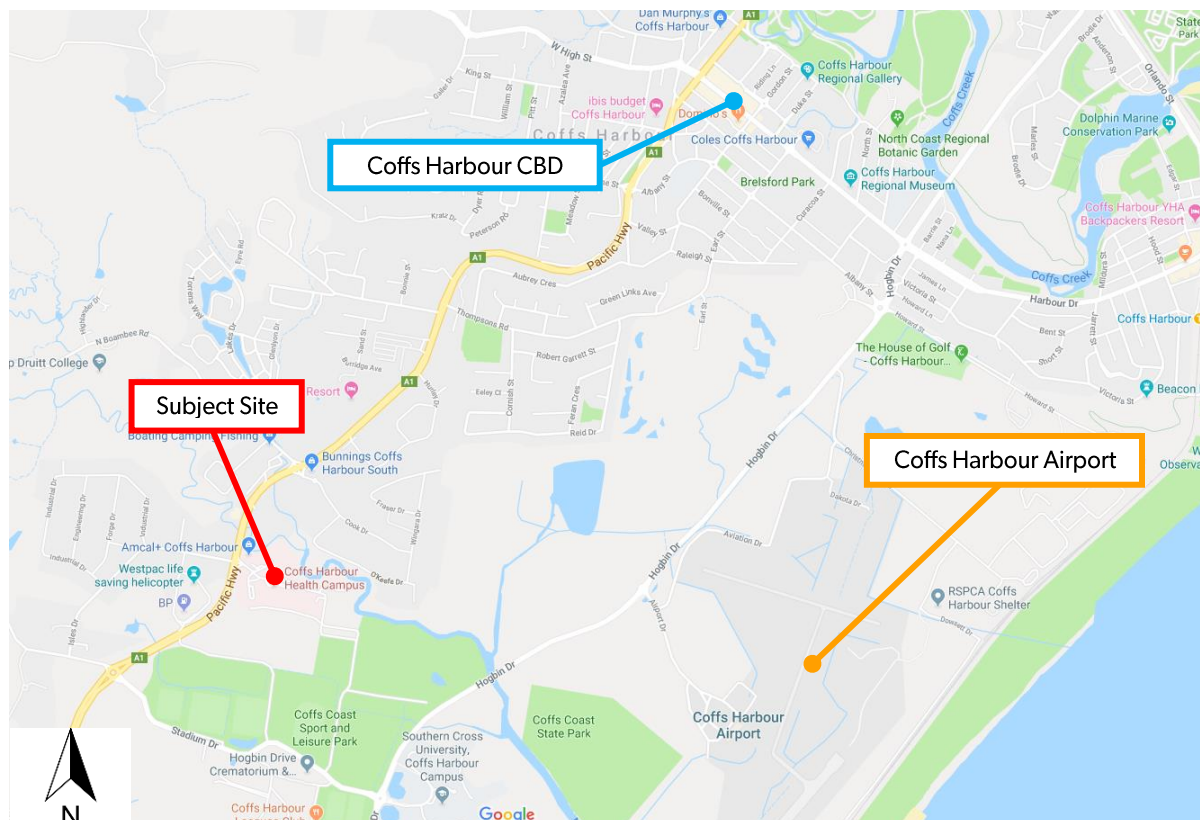


Figure 3 | Site Location

The CHHC was built in 2001 and is the major health precinct for the Mid North Coast Local Health District (MNCLHD), covering the LGAs of Coffs Harbour City, Bellingen, Nambucca, Kempsey and Port Macquarie-Hastings. The CHHC comprises the following facilities (see **Figure 4**):

- Coffs Harbour Hospital (CHH)
- Mid North Coast Cancer Institute
- UNSW Rural Clinical School
- Shearwater Lodge
- an ambulance station
- an at-grade helipad
- car parks/parking zones (see **Figure 5**).

The main entrance to the CHHC is via the Pacific Highway through a signalised intersection at Isles Drive. The main entrance is utilised by public and employee vehicles, loading and servicing vehicles and ambulances. Pedestrian footpaths are also available along the Pacific Highway and the CHHC internal roads. A secondary access via Stadium Drive to the south is primarily utilised by staff or patients with ongoing visitation/treatment.

The CHHC is directly serviced by 4 bus routes providing regular services to the Coffs Harbour town centre, Toormina, Urunga, Nambucca Heads, Bellingen, Bowraville and Macksville. While the site is not on any dedicated cycling path, the Pacific Highway Cycleway runs along the Pacific Highway, Stadium Drive and Hogbin Drive. This cycleway provides connection to Coffs Harbour town centre and is approximately 600 m to the south of CHHC.

The CHHC has a total of 1,133 parking spaces across seven car parks/parking zones (see **Figure 5**).



Figure 4 | Aerial Map of the Coffs Harbour Health Campus

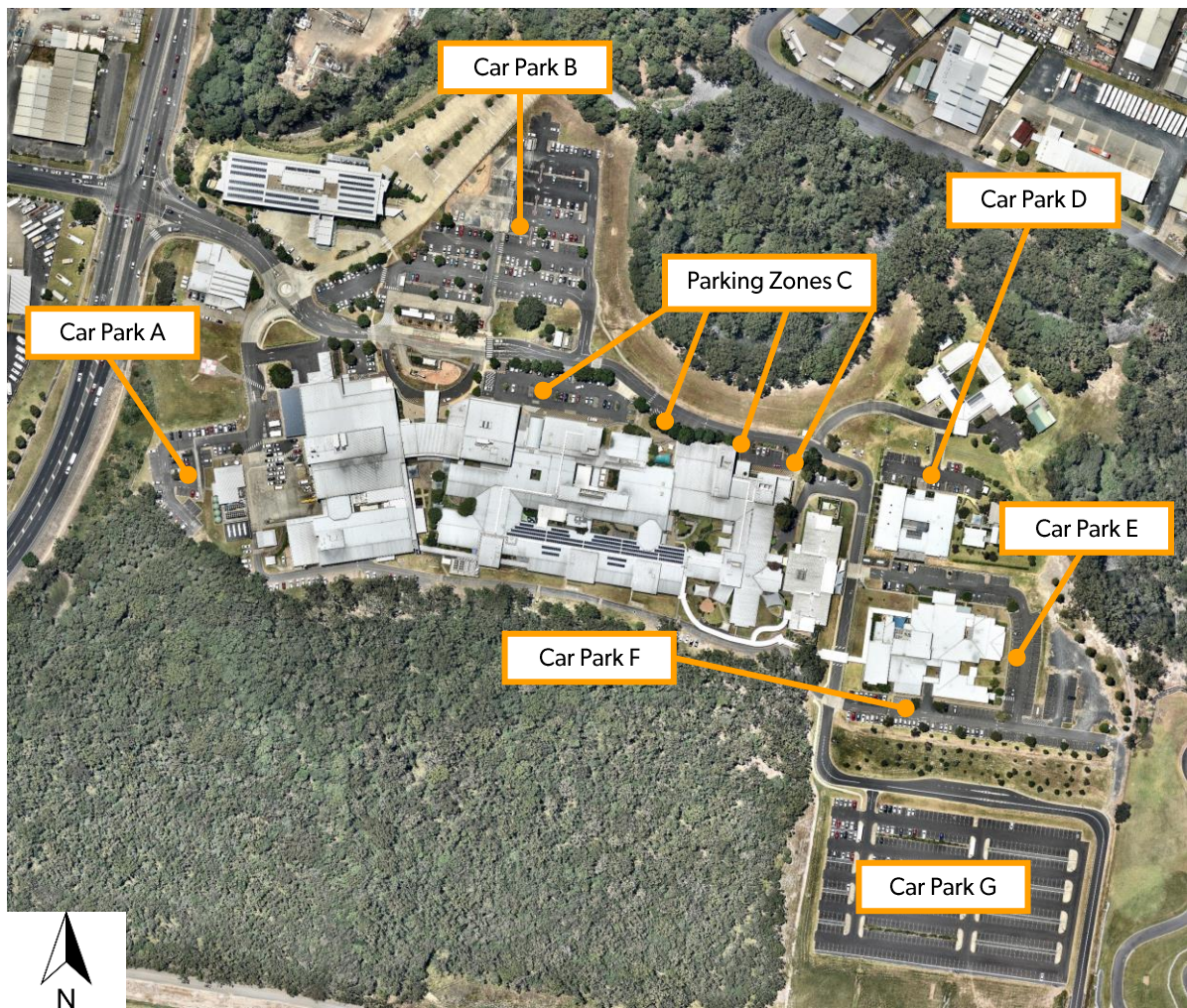


Figure 5 | Existing Car Parks/Parking Zones

1.4 Surrounding Land Uses

The land uses surrounding CHHC are mixed in nature and include industrial, retail, sports and recreation, education and aviation. The site is immediately bound by Newports Creek to the north, the F1 Kart Hire premises and Coffs Harbour Motocross Club to the east, a patch of native vegetation and the Coffs Coast Sport and Leisure Park to the south and the Pacific Highway to the west. Industrial estates, large format retailers and retail shops are located further to the north of Newports Creek and to the west of the Pacific Highway. Southern Cross University and Coffs Harbour Airport are approximately 1 km and 2.5 km to the south-east of the site respectively.

The surrounding development is shown in **Figure 6**.

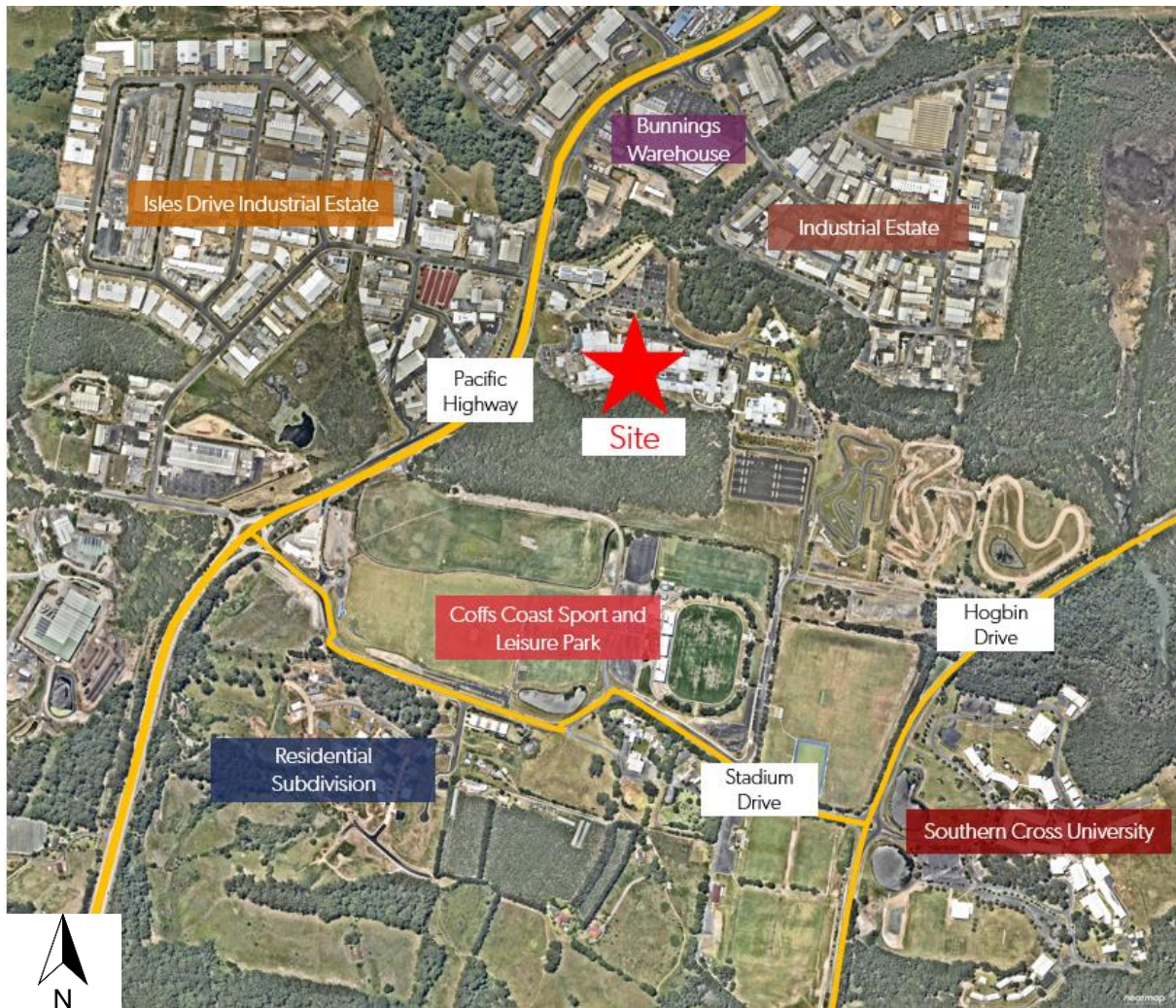


Figure 6 | Regional Context Map

1.5 Other Development Approvals

In June 2018, a Review of Environmental Factors (REF) (015/2018) was approved by NSW Health Infrastructure under Part 5 of the EP&A Act for infrastructure works at the CHHC. A subsequent modification to this REF (015/2018/A) was approved by Health Infrastructure in August 2018.

The approved works include:

- amendments to the access road and associated roundabout at the main access for the CHHC off the Pacific Highway, opposite of Isles Drive
- the construction of eight 15-minute parking spaces at the proposed MBA, 3 new drop-off-only spaces in front of the proposed CSB and a bus stop
- the relocation of the ambulance bays to the western side of the proposed CSB
- the removal of the 118 car parking spaces located in the proposed footprint of the CSB, to be replaced at the proposed new main entrance (25 spaces) and in a new western carpark (93 spaces of which 8 are accessible spaces).

While these infrastructure works facilitate the expansion of the CHH and are interconnected, they were assessed and approved under a separate REF (015/2018) and do not form part of this SSD application. At the time of writing this report, the Applicant has not commenced construction of these infrastructure works.



2. Project

2.1 Description of the Development

The Applicant is seeking development consent for the CHH expansion, including construction of a new five-storey CSB, the refurbishment of the existing hospital building and construction of associated landscaping, infrastructure and services on 345 Pacific Highway, Coffs Harbour. The major components of the development are summarised in **Table 1** and shown in **Figure 7**, and described in the Environmental Impact Statement (EIS), refined in the Response to Submissions (RtS) report included in **Appendix B**.

Table 1 | Main components of the project

Aspect	Description
Development Summary	Construction of a new five-storey CSB (including a new rooftop helipad) and associated landscaping and internal roadworks. Refurbishment of the existing hospital MBA to realign services, including relocation of the emergency department, associated landscaping, infrastructure and service works.
Built form	• The proposed CSB would be 27.7 m high with a gross floor area (GFA) of 15,238 square metres (m²). The CSB includes five levels with a helipad on the rooftop. The CSB is connected to the existing hospital buildings through three ramped pathways • A new ambulance bay and ambulance entrance is located to the west of the new Emergency Department within the proposed CSB • Refurbishment of the existing hospital MBA • Relocation of existing at-grade car parks.
Site area (CHHC)	• Approximately 25 ha
Uses	• Front of house (main entrance lobby, reception, office, café and shops and amenities) • Emergency department • Operating theatres • Surgical inpatient units • Maternity inpatient unit and birthing unit • Paediatric inpatient unit • Intensive Care Unit (ICU) • Administration spaces • A new rooftop helipad.

Aspect	Description
Access	Amended site accesses as approved under REF 015/2018 (to be constructed)
Car parking	Removal of 118 parking spaces. Construction of additional car parks including an additional 312 parking spaces to occur under REF 015/2018.
Public domain and landscaping	- Planting of 24 trees - New café proposed in the CSB opening onto a landscaped courtyard between the existing and new hospital buildings - Two new landscaped courtyards between the CSB and existing MBA - A new forecourt with landscaping and street furniture is proposed as a civic gathering place located to the east of the new main hospital entrance lobby. The CSB building (from Level 1 above) is designed to cantilever the northern part of the forecourt and pedestrian pathway providing weather protection for hospital users - The existing bus stop will be relocated to the north of the proposed CSB.
Hours of operation	24 hours per day, 7 days per week.
Construction period	Total construction time is 34 months, completed in two stages: - Stage 1 – construction of CSB (21 months) - Stage 2 – refurbishment of existing MBA (13 months).
Construction hours	7 am – 6 pm Monday to Friday 7 am – 5 pm Saturday (this is extended construction hours outside the standard hours of 8 am to 1 pm on Saturdays) - No works on Sundays or public holidays.
Signage	Building identification and wayfinding signage.
Jobs	290 construction jobs and 330 new operational jobs.
Capital Investment Vale (CIV)	\$120 million

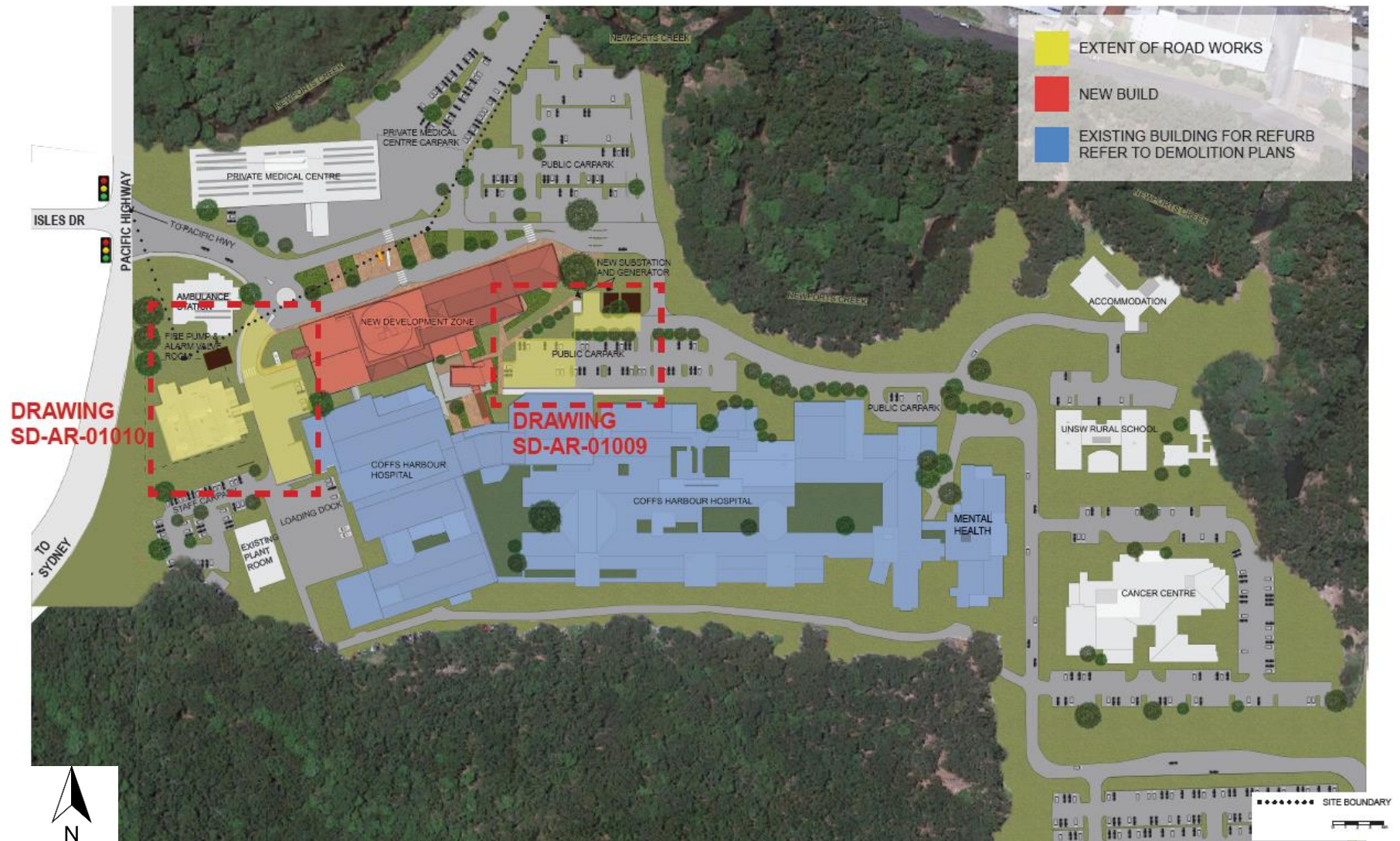


Figure 7 | Proposed Site Plan

2.2 Applicant's Need and Justification for the Development

The Applicant stated the development was required as the CHH at its current capacity would not be able to meet the current and projected population growth and demands for modern health services facility in the Mid North Coast Region.

The NSW Mid North Coast Local Health District (MNCLHD) identified a series of shortfalls in the existing CHH including insufficient hospital beds, operating theatre were operating at its full capacity, failure of meeting emergency treatment and elective surgery performance targets, increasing demands for treatments from chronic and complex patients and patients requiring palliative care and additional spaces for ambulatory services.

The Applicant also advised the CHH was experiencing medical specialist shortfalls which resulted in difficulty of establishing a sustainable workforce and expected the provision of a modern health care facility would assist in recruiting and sustaining staff.



3. Strategic Context

The CHH is part of the MNCLHD and plays a key role in providing specialist services to the region. It is the major referral hospital for the Mid North Coast region.

The expansion of the CHH has been informed by the Coffs Harbour Hospital Expansion Business Case, Coffs Harbour Hospital Clinical Services Plan and Coffs Harbour Hospital Expansion Masterplan, Concept and Schematic Designs.

3.1 North Coast Regional Plan 2036

The North Coast Regional Plan 2036 (the Regional Plan) sets regional priorities and provides guidance and direction for regional and local planning decisions.

The development is consistent with the following direction and priority in the Regional Plan:

- Direction 6: develop successful centres of employment
- Regional Priorities for Coffs Harbour: develop health, education and aviation precincts at Coffs Harbour.

The Regional Plan identifies major hospitals as a major anchor which will shape growth by delivering important services while providing high-skilled job opportunities. The development would also promote the further development of successful centres of employment in the Coffs Coast region. The development would represent an investment of \$120 million in the region and would provide 290 construction jobs and 330 new operational jobs.

3.2 NSW Future Transport Strategy 2056 and State Infrastructure Strategy 2018-2038

The Department considers the development is appropriate for the site as:

- it is consistent with the NSW Future Transport Strategy 2056 providing improved health care services to meet the predicted population growth in a highly accessible location
- it is consistent with State Infrastructure Strategy 2018 – 2038 Building the Momentum as it would provide an upgraded health care facility in a regional centre.



4. Statutory Context

4.1 State significant development

The development is State significant development pursuant to section 4.36 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it is a hospital with a CIV in excess of \$30 million (\$120 million) which meets the criteria in clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP).

4.2 Permissibility

The site is zoned SP2 Infrastructure (Health Services Facility) under the Coffs Harbour Local Environmental Plan (CHLEP) 2013. Hospitals are permissible with consent in the SP2 zone. Therefore, the Minister or a delegate may determine the carrying out of the development.

4.3 Consent Authority

The Minister is the consent authority for the development under section 4.5 of the EP&A Act. On 11 October 2017, the Minister delegated the functions to determine SSD applications to the Executive Director, Key Sites and Industry Assessments where:

- the relevant local council has not made an objection and
- there are less than 25 public submissions in the nature of objections and
- a political disclosure statement has not been made.

Of the 12 submissions received, one objected to the development. Council did not object to the development. No reportable political donations were made by the Applicant in the last two years and no reportable political donations were made by any persons who lodged a submission.

Accordingly, the application can be determined by the Executive Director, Key Sites and Industry Assessments under delegation.

4.4 Other Approvals

Under Section 4.41 of the EP&A Act, a number of other approvals are integrated into the State significant development approval process, and consequently are not required to be separately obtained for the development.

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent (see **Appendix D**).

4.5 Mandatory Matters for Consideration

Section 4.15 of the EP&A Act sets out matters to be considered by a consent authority when determining a development application. The Department's consideration of these matters is set out in Section 6 and **Appendix C**. In summary, the Department is satisfied the development is consistent with the requirements of section 4.15 of the EP&A Act.

4.6 Environmental Planning Instruments

Under section 4.15 of the EP&A Act, the consent authority, when determining a development application, must take into consideration the provisions of any environmental planning instrument (EPI) and draft EPI (that has been subject to public consultation and notified under the EP&A Act) that apply to the development.

The Department has considered the development against the relevant provisions of several key EPIs including:

- State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)
- State Environmental Planning Policy (Coastal Management) 2018 (Coastal SEPP)
- State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33)
- State Environmental Planning Policy No 44 – Koala Habitat Protection (SEPP 44)
- State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55)
- State Environmental Planning Policy No 64 – Advertising and Signage (SEPP 64)
- Coffs Harbour Local Environmental Plan 2013 (CHLEP 2013)
- draft State Environmental Planning Policy (Environment) (draft Environment SEPP)
- draft State Environmental Planning Policy (Remediation of Land) (draft Remediation SEPP).

Development Control Plans (DCPs) do not apply to SSD under Clause 11 of the SRD SEPP. However, the Department has considered the relevant provisions of the Coffs Harbour DCP 2015 in its assessment of the development in Section 6 of this report.

Detailed consideration of the provisions of all EPIs that apply to the development is provided in **Appendix C**. The Department is satisfied the development generally complies with the relevant provisions of these EPIs.

4.7 Public Exhibition and Notification

In accordance with section 2.22 and Schedule 1 to the EP&A Act, the development application and any accompanying information of an SSD application are required to be made publicly exhibited for at least 28 days. The application was on public exhibition from **Thursday 5 July 2018** until **Thursday 1 August 2018**. Details of the exhibition process and notifications are provided in Section 5.1.

4.8 Objects of the EP&A Act

In determining the application, the consent authority should consider whether the development is consistent with the relevant objects of the EP&A Act. These objects are detailed in section 1.3 of the EP&A Act. The objects of relevance to the merit assessment of this application include:

- to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*
- to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*
- to promote the orderly and economic use and development of land,*
- to promote the delivery and maintenance of affordable housing,*
- to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,*
- to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),*
- to promote good design and amenity of the built environment,*
- to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,*

- (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,
- (j) to provide increased opportunity for community participation in environmental planning and assessment.

The Department has fully considered the objects of the EP&A Act, including the encouragement of Ecologically Sustainable Development (ESD), in its assessment of the application (see **Section 4.9**).

Table 2 | Considerations of the Objects of the EP&A Act

Object	Consideration
(a)	The development forms part of a wider program for the delivery of improved and modern health care and associated services in the MNCLHD. The development would facilitate the provision of additional health care facilities that would be properly managed for the benefit of the community and the State. The improved health care facilities, with increased efficiency and effectiveness of service delivery, would provide significant social and economic benefits to the community.
(b)	The development considers the principles of ESD set out in the EP&A Regulation and includes measures to deliver ecologically sustainable development (refer to Section 4.9).
(c)	The development would deliver additional public hospital facilities.
(d)	Not applicable as the development does not involve provisions of affordable housing.
(e)	The development is located on a previously developed and disturbed site. It would not result in the loss of any threatened or vulnerable species, populations, communities or significant habitats.
(f)	The development is not anticipated to result in any impacts upon built and cultural heritage, including Aboriginal cultural heritage.
(g)	The development has been reviewed by the Government Architect NSW (GANSW).
(h)	The development would promote proper construction and maintenance subject to recommended conditions of consent.
(i)	The Department publicly exhibited the development (refer to Section 5.1) which included consultation with Council and other public authorities and provided consideration of their responses (Section 5).
(j)	The Department publicly exhibited the development as outlined in Section 5.1 , which included notifying adjoining landowners, placing a notice in newspapers and displaying the development on the Department's website and at Council's office during the exhibition period.

4.9 Ecologically Sustainable Development

The EP&A Act adopts the definition of ESD found in the Protection of the Environment Administration Act 1991. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- (a) the precautionary principle

- (b) *inter-generational equity*
- (c) *conservation of biological diversity and ecological integrity*
- (d) *improved valuation, pricing and incentive mechanisms.*

The potential environmental impacts of the development have been assessed and, where potential impacts have been identified, mitigation measures and environmental safeguards have been recommended.

As demonstrated by the Department's assessment in Section 5 of this report, the development is not anticipated to have any adverse impacts on native flora or fauna, including threatened species, populations and ecological communities, and their habitats.

The Department has considered the development in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the development. To ensure that appropriate ESD measures are incorporated into the development, the Department has recommended conditions requiring certification of a minimum 4 Green Star rating from the Green Building Council Australia or adoption of ESD measures equivalent to an accredited rating scheme to the satisfaction of the Planning Secretary.

4.10 Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

Under the EPBC Act, assessment and approval is required from the Commonwealth Government if a development is likely to impact on a matter of national environmental significance (MNES), as it is considered to be a 'controlled action'. The EIS for the development included a preliminary assessment of the MNES in relation to the development and concluded the development would not impact on any of these matters and is therefore not a 'controlled action'. As such, the Applicant determined a referral to the Commonwealth Government was not required.

5. Engagement

5.1 Department's Engagement

The Department undertook a range of consultation activities throughout the preparation of the Planning Secretary's Environmental Assessment Requirements (SEARs), including consultation with Council and state government authorities.

After accepting the SSD and EIS for the development, the Department:

- made it publicly available from Thursday 5 July 2018 until Thursday 1 August 2018:
 - on the Department's website
 - at the Service NSW Centres and
 - at Coffs Harbour City Council's office (2 Castle Street, Coffs Harbour)
- notified landowners in the vicinity of the site about the exhibition period by letter
- notified relevant Commonwealth and State government authorities and Coffs Harbour City Council by letter
- advertised the exhibition in the Coffs Coast Advocate.

5.2 Summary of Submissions

The Department received a total of 12 submissions, including 11 received during the public exhibition which were all from Council and government agencies, with none objecting to the development. One special interest group submission was received after the public exhibition which objected to the development. A summary of the issues raised in submissions is provided in **Tables 3** and **4** below, with a copy of each submission included in **Appendix B**.

Table 3 | Summary of government authority submissions

Submitters	Number	Position
Government Agencies	10	
• Airservices Australia	1	Comment
• Civil Aviation Safety Authority (CASA)	1	Comment
• Department of Industry – Lands & Water Division (DoI L&W)	1	Comment
• Environment Protection Authority (EPA)	1	Comment
• Government Architect NSW (GANSW)	1	Comment
• Office of Environment and Heritage (OEH)	1	Comment
• Roads and Maritime Services (RMS)	1	Comment
• NSW Rural Fire Service (RFS)	1	Comment
• SafeWork NSW	1	Comment
• Transport for NSW (TfNSW)	1	Comment

Table 4 | Summary of Council and special interest group submissions

Submitters	Number	Position
Coffs Harbour City Council	1	Comment
Special interest group (note: received after the public exhibition)	1	Object
TOTAL	2	

5.3 Key Issues – Government Agencies

Airservices Australia noted that the development would not interfere with the approach or departure procedures at Coffs Harbour Airport.

CASA advised it had no concerns provided the proposed building would not penetrate the Obstacle Limitation Surfaces or instrument approaches for the Coffs Harbour Airport. CASA also provided matters for consideration regarding departure and approach procedures, applicable standards and aerodrome operations.

DoI L&W did not object to the development and provided matters for consideration including a Dewatering Management Plan and compliance with the NSW Aquifer Interference Policy Assessment Framework and Guidelines for Riparian Corridors (NRAR 2018).

EPA did not object to the development however recommended conditions of consent requiring the Applicant provide a noise verification report and a Construction Noise and Vibration Management Plan prior to commencement of operations and also validate the development's compliance with the *Air Navigation (Aircraft Noise) Regulations 2018*. In response to the findings of the Preliminary Contamination Assessment, the EPA also recommended a condition of consent which requires the CEMP to address potential soil contamination and include an Erosion and Sediment Control Plan.

The EPA also recommended the Applicant investigate options for decommissioning a holding tank under the emergency shower and connecting the drainage to the sewer system under a trade waste agreement.

GANSW supported the development and provided recommendations to further improve public domain, wayfinding, built form, internal amenity, sustainability and public art.

OEH did not object to the development however raised concerns regarding flooding and Aboriginal cultural heritage.

Regarding Aboriginal cultural heritage, the OEH requested the recommendations of the Aboriginal Cultural Heritage Assessment Report (ACHAR) be included in a Cultural Management Plan.

To address flooding concerns, the OEH recommended the design of the CSB be amended to ensure a minimum finished floor level of 5.9 m AHD and be protected to the probable maximum flood (PMF) level of 6.1 m. Further, OEH advised that works should be carried out in accordance with the Boambee – Newports Creek Floodplain Risk Management Plan.

RMS advised the EIS did not explore all feasible mitigation options and required further sensitivity testing and network analysis. The RMS also advised the Traffic Impact Assessment (TIA) did not meet RMS policy standards as no mitigation measures were provided to offset reduced intersection efficiency or excessive queuing on the Pacific Highway.

RMS requested the TIA be revised to include an assessment of cumulative traffic impacts, investigations into traffic signal phasing at the Pacific Highway/Isles Drive intersection, utilisation of the traffic model for the Coffs Harbour Bypass and consideration of emergency vehicles.

RMS also recommended conditions requiring the Applicant prepare a Traffic Management Plan prior to the commencement of construction.

RFS recommended standard conditions of consent regarding Asset Protection Zones, water and utilities, design and construction, access, emergency management and landscaping.

SafeWork NSW recommended fire safety conditions of consent, including the requirement for a Fire Safety Study (FSS).

TfNSW did not object to the development however raised concerns regarding the location of a bus stop. In relation to the proposed bus stop location, TfNSW raised concerns regarding passenger safety and compliance with the *Disability Discrimination Act 1992* as locating a bus stop on a curve restricts deployment of the wheelchair ramps. TfNSW also requested further information on the management of and access to the bus stop during construction.

5.4 Key Issues – Council and Special Interest Group

Council did not object to the development, however raised concerns regarding the potential flooding, traffic and parking impacts and requested additional assessments be undertaken. Further, Council advised that the stormwater management plan did not achieve required pollution reduction targets.

After the public exhibition, the Department received a special interest group submission (the adjacent Coffs Harbour Specialist Medical Centre (the Specialist Medical Centre)). The special interest group submission did not object to the overall proposed expansion of the CHH but objected to the following aspects of the development:

- insufficient information was included in the EIS regarding the proposed CHHC internal road realignment as it would traverse the Specialist Medical Centre owned land
- the development would compromise the existing access to and the future development potential of the Specialist Medical Centre
- inadequate consultation process undertaken by the Applicant.

5.5 Response to Submissions

On 19 October 2018, the Applicant provided a Response to Submissions (RtS) (**Appendix A**) to the issues raised during the exhibition of the EIS. The RtS also made amendments to the development, including:

- a new 31-bed Emergency Department with a satellite medical imaging room, located on the ground floor west of the proposed main entrance and reception area
- the fit-out of two Operating Theatres in the new CSB
- the expansion of the proposed Intensive Care Unit facility located on Level 3 of the new CSB to include an additional four beds
- a revised landscape design.

The RtS was made publicly available on the Department's website and was provided to key agencies to consider whether it adequately addressed the issues raised. A summary of the agencies responses is provided below:

- **Council** requested further information relating to flooding, including flood storage requirements, pre and post development stormwater impacts and hazard mapping. Council also reiterated its comments relating to traffic and car parking, advising that they had not been addressed

- **RMS** confirmed the RtS had addressed its concerns and provided no further comments
- **RFS** had no further comments with respect to the development
- **OEH** confirmed the RtS had adequately addressed comments raised in its original submission
- **GANSW** advised that the RtS only addressed some aspects of its original submission, and reiterated its previous comments regarding way finding, built form, internal amenity and public art
- **DoI L&W** recommended conditions of consent relating to water management during the construction phase of the development
- **TfNSW** provided no further comments.

The Applicant provided an addendum to the RtS in response to the submissions received. The RtS addendum included:

- updated and consolidated architectural and landscape plans, including a response to the GANSW's comments
- an arborist report identifying the onsite trees, proposed trees for removal, impact on trees to be retained and protection measures during construction
- the REFs for the approved infrastructure works
- information on flooding, traffic, parking and biodiversity impacts, in response to the Council's comments.

The Department also invited the relevant public authorities to provide comments on the RtS Addendum to advise whether it addressed their comments.

Council advised it was satisfied the development would not have a significant impact on the surrounding road network and any outstanding parking issues can be addressed through the conditions of consent. Council remained concerned regarding the potential flooding impacts of the development and flood emergency plan outlining management measures responding to and recovering from flooding events.



6. Assessment

The Department has considered the EIS, the issues raised in submissions and the Applicant's RtS in its assessment of the development. The Department considers the key issues associated with the development are:

- built form and urban design
- traffic and parking
- flooding.

A number of other issues have also been considered. These issues are considered to be minor and are addressed in **Table 5** under Section 6.4.

6.1 Built Form and Urban Design

The development involves the demolition of several existing structures and a helipad, construction of a new five-storey CSB, associated linkages to existing hospital buildings and the refurbishment of existing internal areas. The proposed CSB will have a maximum building height of 27.7 m and a total GFA of 15,238 m². The development also involves ancillary business identification and wayfinding signage, landscaping works (predominantly in the two new internal courtyards) and the building entrance forecourt.

6.1.1 Built Form and Scale

The original proposal included the new main hospital entrance and reception area within the eastern part of the CSB's ground floor only and the areas to the west of the main entrance were reserved for future expansion.

In the RtS, the Applicant submitted an amended and consolidated proposal. As shown in the revised development plan, the new CSB would be sited to the north of the existing MBA in place of the existing main entrance, public car park and bus stop, which will be relocated. A new 31-bed Emergency Department adjacent to the acute clinical operation units, the fit-out of two Operating Theatres and the expansion of the proposed ICU facility are also included in the amended CSB design. However, the amendments did not include changes to the original façade treatments.

The Applicant stated that the overall design and scale of the development has considered the need for improved efficiencies in the circulation of patients, staff and visitors. The design would also accommodate the consolidation of day to day operations and help facilitate modern health services.

The northern façade is broken into vertically variant sections including the ground level, medium rise and upper storeys. Each section is defined by a range of materials and finishes which were selected to reflect the site context, minimise maintenance requirements and address potential vandalism concerns. The ground floor is cantilevered by medium rise floors above with a north-facing colonnade form which together maximises the sunlight access and provides weather protection for patients, visitors and employees (see **Figure 8**).

At the new main entrance, the design includes a curved built form with clear glazing which the Applicant suggests defines the entry point and permits pedestrian circulation (see **Figure 9**). Robust materials were selected for the base of the building, including light sandstone brickwork, sandstone and wood cladding.

Above the ground floor, the medium rise and upper storeys are set back along the western elevation to minimise visual dominance when viewed from the Pacific Highway. The façades of the medium rise and upper storeys are designed with cladding materials of defined colours including grey and white. Aluminium forms vertical and

horizontal sun control projections on the northern façade. The Applicant suggests the proposed colours have been chosen to reflect the local character, including forest timber, sandstone rocks, sand dunes and ocean.

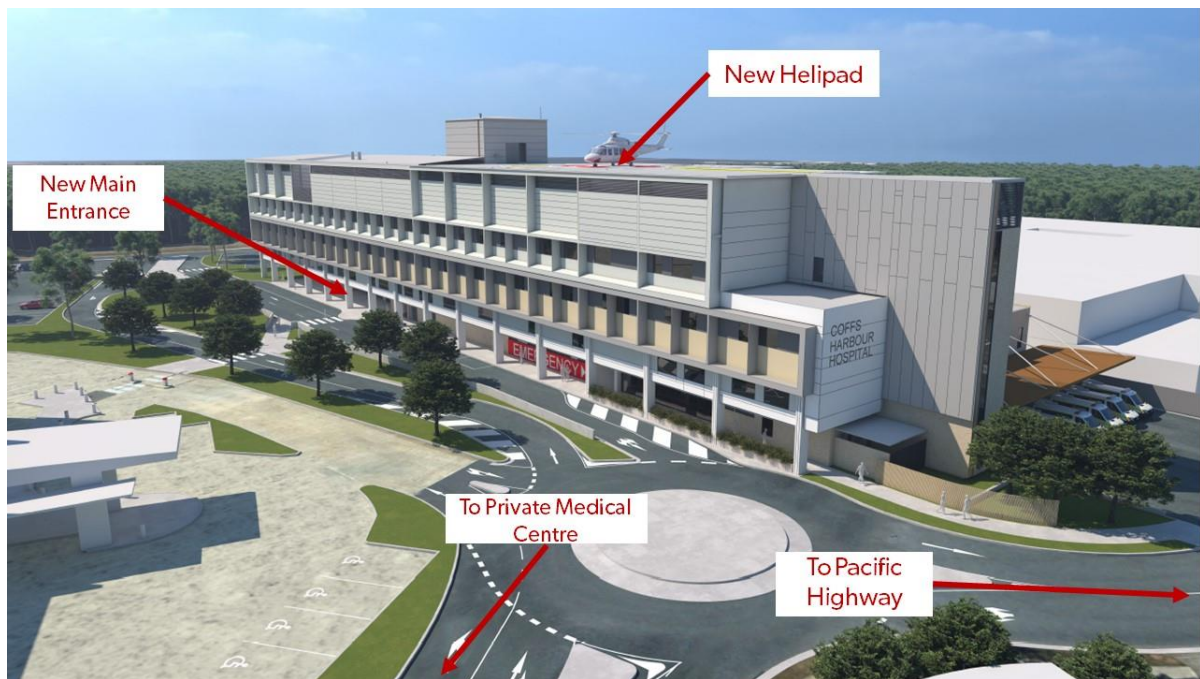


Figure 8 | New Clinical Services Building Photomontage

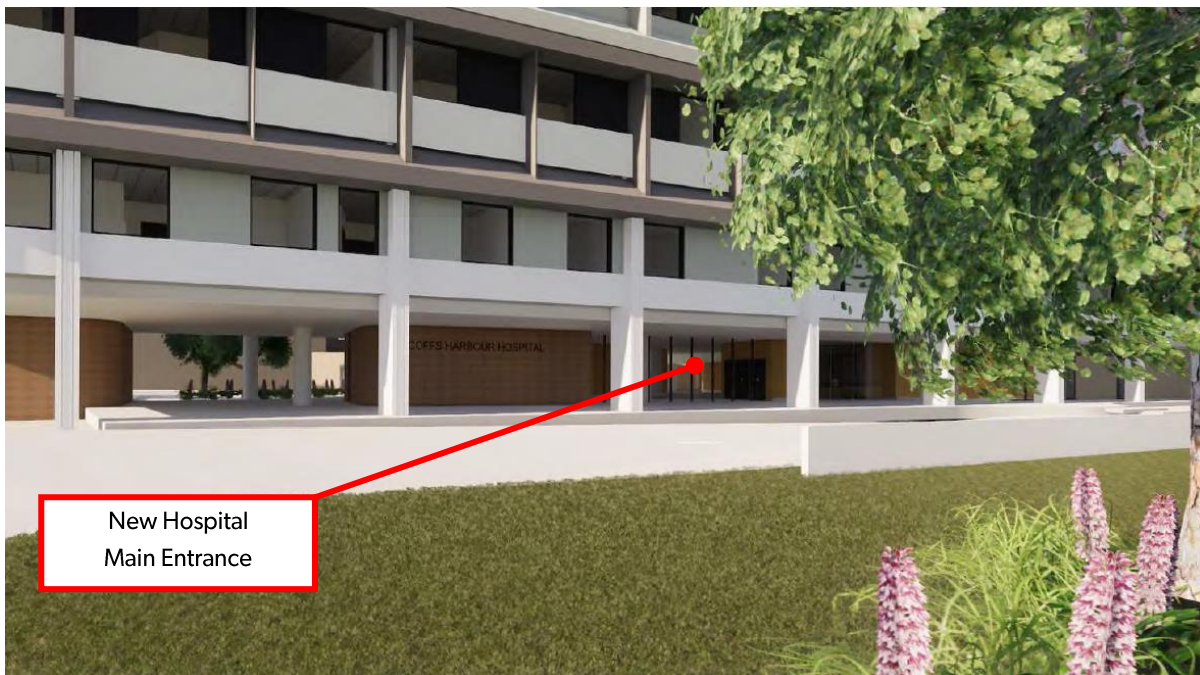


Figure 9 | New Hospital Main Entrance

During the exhibition of the development, the GANSW advised that it supported the overall design, however, recommended further consideration be given to the building façade, articulation of the plant room and stairs, the homogenous northern façade design and the need to clearly differentiate the main hospital and Emergency Department entrances.

After reviewing the revised design and the additional information provided, GANSW had some concerns regarding the distinction of the main entrance. However, the Applicant advised the design of the main entrance had been revised accordingly and adequately responded to GANSW concerns.

No comments were received from Council, other government agencies and the special interest group regarding built form and scale of the development.

The Department considers the built form is acceptable as the main entrance is defined by a well-articulated forecourt and the relocated Emergency Department is located immediately adjacent to the entrance. The Department considers the signage strategy utilising business identification and wayfinding signs can properly distinguish the Emergency Department from the hospital main entrance.

The Department's assessment concludes that the proposed building height, built form and design are compatible with the existing facility and site context. The selected external colours and materials are also considered acceptable for the site.

6.1.2 Landscaping and Public Art

Landscaping

The proposed landscaping works include two new internal courtyards, a main entrance forecourt and perimeter landscaping for the car parks and the expanded CHH. The Applicant advised the development was designed to address the role of CHHC as a critical civic infrastructure for the community, create a sense of place which respects human scale, connect the existing and proposed hospital buildings and soften the built form and hardstand areas.

Based on its review of the EIS and RtS, GANSW recommended the Applicant investigate options to provide additional landscaping, including: a larger garden with a paved 'shared zone' connection to the hospital, use of the hardstand area at the centre of the forecourt as a garden for hospital users and partially reclaim the existing carpark to the east of the café as additional landscaping with seating for people.

The Applicant amended the landscape design (see **Figure 10**) in accordance with the revised CSB design and to respond to the recommendations of the GANSW. The amended landscaping design consists of:

- a revised traffic island accommodating formal landscaping, street furniture and a paved pedestrian pathway connecting the new hospital main entrance to the public car park to the north
- a revised forecourt with a larger garden, consisting of soft landscaping and street furniture for hospital users
- two internal courtyards accessible from the new Emergency Department and café
- additional trees and plantings to the car park, site frontages and traffic islands to provide additional shading and screening.

GANSW reviewed the amended landscape design and was satisfied it adequately responded to the previous issues raised.

Council, other public agencies and the special interest group did not raised issues about the proposed landscaping.

The Department considers the development provides a well-designed public domain for patients, visitors and staff as it will improve the quality of the existing public domain, provide additional hard and soft landscaping, encourage social interaction and improve vibrancy within the CHHC. The works will also improve pedestrian connectivity within the site, including providing direct connection between the main entrance, bus stop and car parks to the north and east.



Figure 10 | Landscape Master Plan

Public Art

The EIS did not include a public art strategy for public domain. The GANSW commented the proposed expansion should support the specific needs and reflect the cultural heritage of the diverse community. To achieve this, GANSW suggested a public art strategy must be developed in consultation with the community to ensure cultural heritage is incorporated in the architectural and landscape design.

The Applicant confirmed in its RtS that a public art strategy was being developed in consultation with the local community to address the comments provided by GANSW regarding the community consultation.

The Council and special interest group submissions did not raised concern relating to the public art.

The Department acknowledges the importance of public art enhancing the public domain's vibrance and improving hospital users' experience. Accordingly, the Department has recommended conditions requiring the Applicant prepare and implement a public art strategy as part of the detailed landscape design for the development.

6.1.3 Visual Impacts

The development has the potential to impact the visual amenity of the locality as it involves an increase in the built form and scale of the CHH, which would be visible from public vantage points. The EIS included a Visual Impact Assessment (VIA) that assessed the visual impact of the development on the surrounding landscape and visual amenity.

The VIA identified the CSB would be mostly visible from the south and west of the site. The native vegetation adjacent to the site would provide a visual buffer for existing developments to the north and south. The main visual change would be experienced by passing pedestrians, drivers and cyclists on the Pacific Highway. Considering the nature of passing traffic, the users of the Pacific Highway would only be exposed to any visual change for a

short amount of time. As such, the VIA concluded the visual impacts on the Pacific Highway users would be minimal.

The VIA also considered the visual impacts of the development on hospital staff and visitors. Due to the introduction of a new five-storey building, hospital users would experience notable visual changes. However, the proposed building scale is compatible with the existing development and the development incorporates well-articulated built form integrated with the existing hospital building. Further, the proposed landscaping would help offset the visual impacts on hospital staff and visitors.

No comments were received from Council, government agencies or the special interest group regarding the potential visual impacts of the development.

The Department's assessment considers the CSB will have minimal visual impacts on surrounding developments as the proposed building height would be located within the centre of the large CHHC site with ample setbacks to the site boundaries. Further, the existing buildings and bushland in the site vicinity also provide visual transitions and buffers to the new CSB when viewed from public vantage points.

The Department notes there may be some views of the development from the Pacific Highway, however any impact is considered minimal as the view would be temporary. The hospital users would experience the increased building footprint, but this impact would be appropriately offset by the architectural features of the new building and the additional landscaping.

6.1.4 Conclusion

The Department notes the proposed building height is compatible with the existing developments in the locality. The CSB would be located within the centre of the large CHHC site with extensive setbacks to the site boundaries. Existing buildings, landscaping and bushland could provide adequate visual transitions and buffers to the surrounding properties and offset short lived visual impacts experienced by hospital users. The new landscaped forecourt and internal courtyards would provide improved pedestrian connectivity through the CHHC and facilitate an active and engaging public domain.

The Department's assessment concludes the proposed built form and public domain design positively respond to the site context and would commensurate the strategic importance of the CHHC as a regional health services hub.

6.2 Traffic and Parking

Construction and operation of the CSB would generate additional traffic movements to and from the site and have the potential to impact the safety, capacity and efficiency of the local and regional road network.

To support the development and respond to the issues raised by Council and state government agencies, the Applicant submitted a TIA prepared by SECA Solutions and supplementary information prepared by GeoLINK and GTA Consultants in the RtS and Request for Additional Information respectively.

6.2.1 Car Parking and Access

Car Parking

A substantial additional car park was approved under Part 5 of the EP&A Act in September 2014 (REF Approval No: 010/2014) in two stages for the CHHC. As part of the REF, GeoLINK prepared a TIA which concluded that 1,400 parking spaces were required to cater for the existing and future demand (once the development is operation) of the CHHC site. At the time, the CHHC contained 672 parking spaces which were often saturated during peak visitation periods. As such, Stage 1 of the car park expansion was completed immediately and provided 462 additional parking spaces (see **Figure 11**). The CHHC presently contains 1,133 parking spaces and

after Stage 2 of the car park expansion the site, will contain 1,452 parking spaces which is in excess of the amount forecasted to be required in the TIA.

Council initially raised concerns regarding the provision of adequate parking, however, after reviewing the GeoLINK TIA provided as part of the REF, suggested adequate parking could be facilitated through conditions of consent.

The Department notes in its current form, the CHHC presently has sufficient parking provision for patients, visitors and employees due to the construction of the Stage 1 car park. The Applicant has relied on the future Stage 2 car park expansion to meet the parking demand generated by the development. Consequently, the Department has recommended conditions of consent requiring the Applicant construct and operate the Stage 2 car park prior to the occupation of the CSB. This will ensure that the CHHC, including the development, has as an adequate supply of parking spaces to avoid over saturation.

The Department's assessment of parking concludes that an adequate supply of parking spaces would be available to ensure the efficient and orderly movement of vehicles through the CHHC site and avoid parking on the local road network once Stage 2 of the car park expansion is constructed.

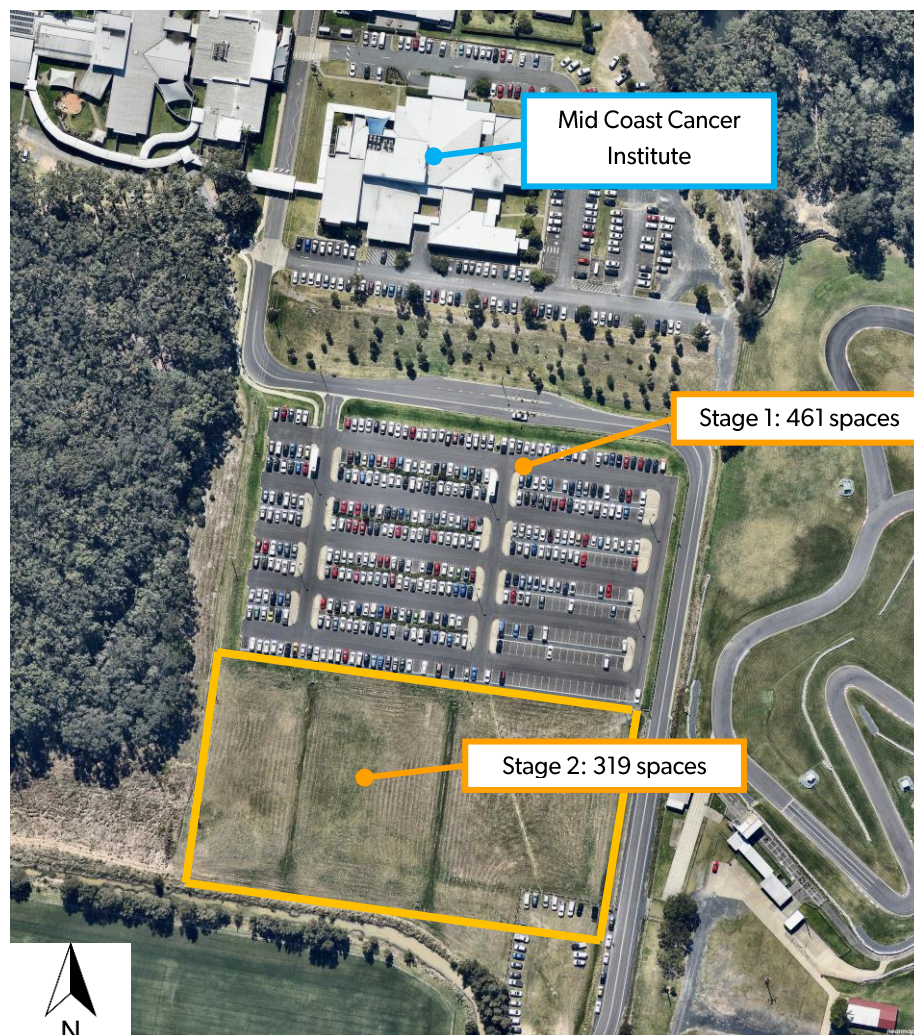


Figure 11 | Southern Car Park Development

6.2.2 Construction Traffic Impacts

Construction would take place across two stages over approximately 34 months. Stage 1 includes construction of the CSB (21 months) and Stage 2 includes refurbishment of the MBA (13 months). The Applicant prepared a draft

Construction Management Plan (OCMP) to demonstrate how the impacts associated with construction would be mitigated and the cumulative impact on the local road network would be minimised.

Construction vehicles would arrive onsite via the Pacific Highway and would utilise the signalised Pacific Highway/Isles Drive intersection. The existing access via Phil Hawthorne Drive and Stadium Drive would only be used by construction vehicles when required to minimise impacts on residential properties to the south of Stadium Drive. The SECA TIA anticipated 20 construction vehicle movements per day to/from the site.

The existing ambulance bay will be demolished for the construction of the CSB. In the interim, six temporary ambulance bays which were approved under the REF application 015/2018, will be located to the west of the existing MBA to be used during construction (see **Figure 12**).

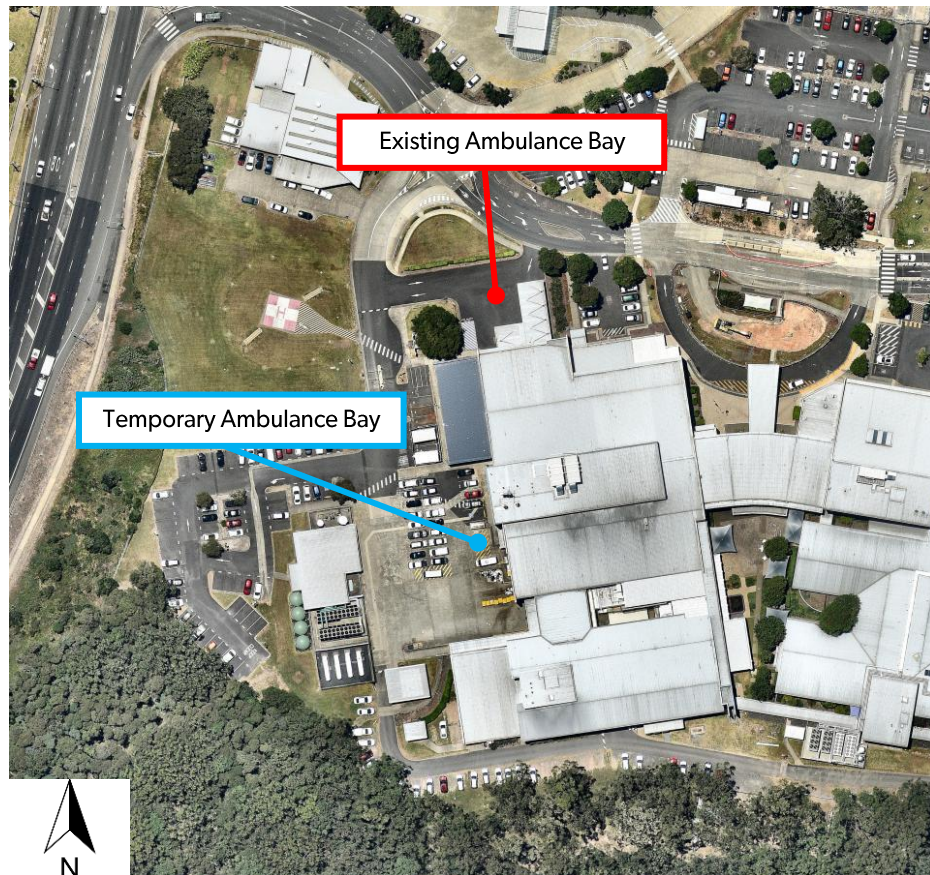


Figure 12 | Existing and Temporary Ambulance Bays Locations

The SECA TIA advised during construction, access to the CHH for pedestrians, patient and employee vehicles, ambulances and delivery vehicles would be maintained. The OCMP identifies the safety management measures that will be used to protect pedestrians during construction, including directory and warning signage, barricades, hoarding and safety fences. Traffic controllers will also be employed to manage the interface of construction vehicles with pedestrians, patients and employees.

RMS recommended the Applicant prepare a Construction Traffic Management Plan for the construction phase of the development. Council and other public authorities have not raised any objection or concerns in respect to construction traffic.

The Department is satisfied construction traffic impacts can be appropriately managed through the recommended conditions requiring the Applicant prepare a Construction Traffic and Pedestrian Management Plan (CTPMP) prior to the commencement of construction.

6.2.3 Operational Traffic Impacts

The development would result in a total net increase of 121 hospital beds and 330 additional full-time equivalent staff which would increase the potential traffic impacts of the CHHC and could impact the safety and efficiency of the road network.

The SECA TIA included SIDRA modelling of the Pacific Highway/Isles Drive intersection. The SIDRA modelling estimated in 2026 when the expanded CHH operates at full capacity, the overall performance of the intersection during morning peak hours would retain a Level of Service (LoS) C and during afternoon peak hours would improve from LoS D in 2017 to LoS C in 2026. The SIDRA modelling also noted the approaches at Pacific Highway/Isles Drive intersection would experience a LoS E and LoS F in 2026.

Council and the RMS raised concerns with the impact the development would have on the performance of the intersection approaches.

As part of the RtS, the Applicant argued the SIDRA modelling provided in the TIA did not provide an accurate representation of traffic impacts as it was based on 100% of vehicles accessing the site from the Pacific Highway and did not consider the utilisation of the Phil Hawthorne Drive access by employees and visitors. As such, the Applicant provided revised SIDRA modelling which considered approximately 40% of staff and 30% of hospital visitors would use the alternative access via Phil Hawthorne Drive access. The revised SIDRA modelling estimated the overall performance of the Pacific Highway/Isles Drive intersection, including approaches, would average a LoS C in 2026.

Further, the SECA TIA Addendum suggested the potential increase of delays at the Pacific Highway was due to the existing high traffic volumes and the traffic light signal phasing. By adjusting green light times at the intersection, the Pacific Highway/Isles Drive intersection would continue to operate at similar LoS to its current level with similar queue lengths after the development is fully operational.

To support the revised SIDRA Modelling findings and respond to Council's comments on the potential operational traffic impacts, GTA Consultants prepared an additional TIA which made following comments.

Phil Hawthorne Drive/Stadium Drive Intersection

It was estimated that every hour, the development would generate up to 143 vehicle trips, including 43 at the Phil Hawthorne Drive/Stadium Drive intersection, representing 30% of the total additional hourly vehicle trips. Compared with the existing hourly vehicles movements (1,000 vehicles), the increase generated by the development would be marginal.

Pacific Highway/Isles Drive Intersection

Up to 100 additional vehicle movements per hour would occur at the Pacific Highway/Isles Drive intersection. Based on the existing traffic volumes of over 3,000 vehicles per hour at this intersection, the additional vehicle movements represented less than 3% of the total traffic volume at the Pacific Highway/Isles Drive intersection.

After reviewing the SECA TIA Addendum and GeoLINK TIA, Council and the RMS advised they were satisfied the Applicant adequately responded to the previous issues raised.

The Coffs Harbour Specialist Medical Centre submission raised concern about the CHHC internal road realignment with associated potential impacts on the development potential of the Specialist Medical Centre. The Department notes the REF 015/2018 was amended in August 2018 to refine the internal road alignment and avoid works on the Specialist Medical Centre land. The development therefore would have minimal impacts on the access to the Specialist Medical Centre and its future developments.

The Department considers the Applicant has provided the necessary information to carry out a robust assessment of the operational traffic impacts of the development. The Applicant's SIDRA modelling and predicted traffic distribution has demonstrated that the local road network could accommodate the additional traffic generated by the development. The Department has recommended conditions of consent including the preparation of an Operational Traffic Management Plan to ensure traffic movements within the CHHC are adequately managed and encourage the use of the Phil Hawthorne Drive access by employees. The Department has also recommended a condition of consent requiring the preparation of a Green Travel Plan to encourage the provision and use of sustainable transport modes to reduce car dependence in consultation with Council and TfNSW.

6.2.4 Conclusion

The Department's assessment concludes that the development includes sufficient car parking provisions to meet the predicted parking demand.

The Department has considered the potential traffic impacts from construction and operation of the development including potential impacts on the operational performance and safety of the surrounding road network. The Department is satisfied that the construction traffic impacts of the development on the existing CHH operations would be appropriately managed through the preparation and implementation of a CTPMP.

The Department notes the Pacific Highway/Isles Drive intersection is estimated to maintain a LoS C in 2026 and the future traffic generation would be shared between the western site access at Pacific Highway and the southern site access at Phil Hawthorne Drive. The development would generate up to 100 and 43 hourly vehicle trips at Pacific Highway/Isles Drive intersection and Phil Hawthorne Drive/Stadium Drive respectively which are minor increase to the existing traffic volumes. By preparing and implementing a Green Travel Plan, the development would encourage use of sustainable traffic modes and reduce the potential traffic generation of the development.

6.3 Flooding

The site is within the Boambee-Newports Creek Catchment. There are no natural waterways within the site, but Newports Creek forms the northern boundary of the CHHC and is approximately 150 m north of the development footprint. The new CSB is identified to be impacted by flood waters during a 1% Annual Exceedance Probability (AEP) event.

The Applicant provided a flooding impact assessment (FIA) in the EIS and a supplementary FIA as part of the RtS which made the following conclusions:

Flood Behaviour Assessment for 5% AEP Events

- during a 5% AEP event, there would be minimal flood afflux within the site and the predicted flood afflux was concentrated in the south leg of the roundabout to the south of the private medical centre.

Proposed CSB Ground Floor Level Against the PMF Level

- the new hospital building is protected to the PMF level through the construction of the access road to a level higher than the PMF
- the proposed building would provide some protection to the existing hospital building as it is a barrier across the northern frontage, where the highest flood levels are located.

Impacts on Site Accesses

Western Hospital Access from the Pacific Highway

- the hospital access road from the Pacific Highway (to the north of the existing ambulance station) is at RL 5.4 m AHD and the PMF level at this road was approximately 6.7 m AHD. Therefore, the site access is presently subjected to a flood depth of 1.3 m during the PMF
- the development would increase the flood depth at the Pacific Highway access road by 100 mm representing a negligible increase and would not significantly decrease accessibility for emergency response vehicles during PMF events.

Southern Hospital Access from Phil Hawthorne Drive

- the development would reduce the PMF level at the southern access from Phil Hawthorne Drive, therefore the development would allow easier access during a PMF event to the hospital from Phil Hawthorne Drive.

Emergency Response Plan (ERP)

- presently, CHH has an existing ERP and the Applicant committed to revise the ERP in accordance with the revised flood modelling.

Impacts of the Development on Council's Flood Mitigation Works for 1 in 100 AEP Events

- it is predicted that the maximum flood afflux height in 1 in 100 AEP events was limited to the immediate area surrounding the hospital entirely within the site boundary, thus the development would not cause adverse impacts offsite.

Council raised a number of concerns including assessing downstream flooding impacts during all storm events, clarification of flood storage capacity of the landscaping area in the internal access road, hazard mapping and flooding behaviour assessments for 5% AEP and PMF events.

The Applicant provided additional information to address the concerns of Council including revised hazard mapping which showed the development would not increase the hazard classification of other areas of the CHHC site and adjacent lands during the PMF. To ensure the issues raised by Council were addressed and to better understand the impact the development could have on flood behaviour in the locality, the Department requested technical flood specialists at the OEH review the additional information. The OEH's review confirmed the issues raised by Council had been satisfactorily addressed based on the additional modelling and FIA conducted by the Applicant which demonstrated that Phil Hawthorne Drive would provide emergency access during a PMF event, the predicted flooding impacts would be contained entirely within the CHHC boundaries and the development had no adverse impacts on Council's flood mitigation works.

No other submissions raised issues about the potential flooding impacts of the development.

The Department is satisfied the Applicant has provided a sufficient assessment of the potential flood impacts of the development including a comprehensive assessment of flood behaviour during the PMF. As the site access is presently impacted during the PMF by 1.3 m of standing water, the CHH has an Emergency Response Plan (ERP) in place to provide for the movement of patients during flooding events, including the use of alternative accesses. The development would not alter the approach taken in the ERP as the increase in water depth at the access caused by the development (100 mm) would be negligible. The development is also expected to have a positive benefit to the CHH during flood events as the new entrances would be protected to the PMF flood level by the new elevated access road and raised floor heights. The Applicant has further shown that the development would not adversely impact adjacent landowners or other buildings within the CHHC through the dispersion of flood waters during up to and including the PMF event.

Conclusion

The Department acknowledges the concerns raised by Council and has endeavoured to resolve their outstanding issues by engaging flood experts at the OEH to review the FIAs and additional information prepared by the Applicant.

To ensure the development has minimal exposure to flooding impacts, the Department has recommended a number of conditions including:

- a minimum floor level of RL 5.9 m AHD for the CSB
- the CSB is to be protected by road kerbs to the PMF level of RL 6.1 m AHD
- the CSB is constructed with flood resilient materials
- all electrical utilities are located above the PMF level of RL 6.1 m AHD
- updating the Flood Emergency Response Plan.

Subject to the recommended conditions, the Department concludes the development would not result in significant impacts in the event of a flood including during a PMF event.

6.4 Other Issues

The Department's consideration of other issues is provided at **Table 5**.

Table 5 | Department's assessment of other issues

Findings	Recommended Condition
Noise and Vibration	
• The development has the potential to generate noise and vibration during construction and operation which could impact the amenity of the existing hospital and surrounding properties.	Require the Applicant: • prepare and implement a Construction Noise and Vibration Management Plan
<u>Construction</u> • Arup prepared a Construction and Operational Noise and Vibration Assessment (CONVA) report in accordance with relevant EPA noise policies and guidelines. • The proposed construction hours would be the standard construction hours per the Interim Construction Noise Guidelines (ICNG). • Construction noise levels were found to satisfy the Interim Construction Noise Guidelines (ICNG) at all private residential and industrial receivers as well as Coffs Coast Sport and Leisure Park. However, exceedances of between 14 dB(A) and 26 dB(A) were predicted at nearby health services facilities within the CHHC during construction. • The Department notes these exceedances were based on the worst-case scenario when all construction machinery and jackhammers operating simultaneously. Further, the exceedances would likely be experienced during site establishment works (approximately 1	• undertake a Noise Verification Report • ensure that noise generated during operation complies with the relevant policies and regulations • minimise noise from the development utilising best practice noise management measures.

months). Therefore, the prediction was conservative in nature and the construction noise impacts would be temporary and short lived.

- To mitigate the potential construction noise impacts, the Applicant committed a series of management measures including sealing of building openings, using of low noise generating machines and plant and locating stationary plant away from sensitive receivers.
- EPA recommended the Applicant develop mitigation measures and management processes for construction through a Construction Noise and Vibration Management Plan (CNVMP) as a condition of consent.
- The Department has recommended conditions requiring the Applicant prepare and implement a CNVMP which includes measures to decrease the impact experienced at receivers within the CHHC (that could include respite periods or noise attenuation) to mitigate any noise impacts during construction.

Operation

- As detailed equipment associated with the expanded CHH have not been determined, the CONVA did not include predicted noise levels at identified sensitive receivers and comparison of the predicted noise levels with the project noise trigger levels to determine the proposed noise mitigation measures.
- The CONVA did not include predicted noise levels generated by the aeromedical helicopter operations. The Department notes the development only includes relocation of the helipad without changes to the existing helicopter operations and considers the helicopter noise levels would be consistent as currently experienced.
- Neither the EPA or Council had concerns regarding operational noise impacts however the EPA advised the Applicant would be required to operate aeromedical helicopters in compliance with the *Air Navigation (Aircraft Noise) Regulations 2018*.
- The Department notes the Applicant has committed to undertake further detailed acoustic design following confirmation of building services equipment. Accordingly, the Department has recommended conditions requiring the Applicant confirm service equipment and undertake a noise verification report against the recommended project noise levels.
- The hospital is removed from residential areas which could be impacted by operational noise during night time periods. As such, the development is not expected to have an impact on sleep disturbance.

Findings

Recommended Condition

- The Department's assessment concludes that noise from operation of the development would comply with relevant policies and guidelines.
- Conditions have been recommended including the preparation and implementation of a CNVMP and undertaking a noise verification report to ensure potential noise impacts are mitigated or managed.

Stormwater

- The development has the potential to increase the quantity of stormwater runoff and alter the quality of stormwater discharging from the site.
- The EIS included a Civil Design Report prepared by Bonacci Group which provided an assessment of drainage and stormwater for the development.
- The report stated that the overall amount of impervious surface would not be altered significantly as the pervious surfaces lost to the CSB would be offset from the provision of additional landscaping. Further, the stormwater generated from the western carpark would be captured by bioretention basins and the nature reserve on the southern extent of the site.
- Council requested further consideration be given to restricting discharges for smaller rain events to ensure drainage patterns and peak flow rates are not altered. Council also advised the development did not meet all the pollutant reduction objectives outlined in Council's DCP.
- The Applicant responded in its RtS with additional DRAINS modelling results which demonstrated the pre- and post-development runoff flows would be consistent during 1%, 5% and 10% AEP events.
- The Applicant suggested the runoff from the roof would result in less pollutants than the existing runoff from the carpark. Further, runoff from western car park would meet Council's reduction targets through the use of permeable paving and pollutant removing vegetation.
- The Department is satisfied the Applicant has demonstrated the development would result in stormwater quantity and quality that is equal to or better than the existing conditions.
- The Department has recommended conditions requiring preparation and implementation of a Construction Soil and Water Management Plan and a Stormwater Operation and Maintenance Plan.

Require the Applicant:

- design and install a stormwater management system
- prepare and implement a Construction Soil and Water Management Plan
- prepare and implement a Stormwater Operation and Maintenance Plan.

Groundwater

- In the RtS, the Applicant clarified it was unlikely construction would intercept groundwater. Should dewatering be required during a rainfall event, it would be carried out in accordance with a Soil and Water Management Plan.
- DoI L&W advised a Dewatering Management Plan and a dewatering licence would be required and recommended the Applicant prepare and implement a Groundwater Management Plan should groundwater be intercepted.
- The Department is satisfied the Applicant has demonstrated groundwater is unlikely to be intercepted and incorporated DoI L&W's recommendations in the recommended conditions to ensure protocols are in place should groundwater be intercepted during construction.

Require the Applicant:

- prepare a CEMP including spills and leakages control measures, inspection regime for erosion and sediment controls and water quality monitoring regime
- prepare a Groundwater Management Plan in consultation with the DoI should groundwater be encountered during construction.

Crime Prevention Through Environmental Design (CPTED)

- The development has the potential to be impacted by concealed criminal behaviour and requires good surveillance through environmental design.
- The EIS included an assessment against the four principles of CPTED. The CPTED assessment concluded that the development provided adequate public and passive surveillance and did not provide opportunities for concealed criminal behaviour.
- The Department is satisfied that the principles of CPTED have been considered and incorporated into the design of the development through the provision of:
 - lighting, signage and CCTV security measures to provide access control and surveillance
 - indoor and outdoor gathering spaces for staff and visitors to encourage territorial enforcement
 - low maintenance planting and building materials to minimise opportunities for antisocial behaviour.
- The Department has included a condition which requires the proposed CPTED measures be incorporated in the Operational Environmental Management Plan (OEMP).

Require the Applicant:

- prepare and implement an OEMP including measures to ensure all wayfinding signage, CCTV security measures and landscaping is appropriately managed to ensure their ongoing effectiveness.

Contamination

- A Preliminary Contamination Assessment (PCA) was undertaken by Coffey Geotechnics prepared in accordance with the Contaminated Sites: Guidance for Consultants Reporting on Contaminated Sites

Require the Applicant:

Findings	Recommended Condition
and National Environmental Protection (Assessment of Site Contamination) Measure 1999 (as amended). • The PCA concluded that potential contaminants are below the Health Investigation Levels for commercial/industrial use, the site would be suitable for the ongoing use as a hospital and a Remedial Action Plan (RAP) would not be required. • During exhibition, the EPA flagged that a holding tank under the emergency shower was undefined for location, size and discharge points. • The EPA also recommended the Applicant address potential soil contamination in the CEMP. • In its RtS, the Applicant advised the holding tank under the emergency shower would be decommissioned and replaced at a different location. • The Department considers that the area of the site to which the development relates has historically be used for grazing and since early 2000's as a hospital and associated carpark. As such, the Department agrees with the PCA that the site is suitable for the expansion of the CHH and a RAP is not required. • The Department has recommended conditions of consent requiring the preparation and implementation of an Unexpected Finds Protocol to ensure any contamination found during construction is appropriately managed.	• prepare and implement an Unexpected Contamination Protocol • address the potential soil contamination in the CEMP.

Biodiversity

• On 4 April 2018, the Applicant lodged a waiver request for the preparation of a BDAR pursuant to Clause 7.9 of the Biodiversity Conservation Act 2016 (BC Act). This request was accompanied by a Biodiversity Assessment (BA) prepared by GeoLINK. • The BA demonstrated the development footprint is on a cleared portion of the CHHC with no threatened species or ecological communities or their habitats within the footprint. Therefore, the BA advised that the proposed development would be unlikely to have an impact on biodiversity values. • Waivers from the OEH (dated 20 April 2018) and the Department (dated 24 April 2018) have been obtained which determined that there was no need for a Biodiversity Development Assessment Report (BDAR). • No comments were received during the exhibition period on biodiversity issues.	No conditions are recommended.
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Findings

Recommended Condition

- The Department's assessment concludes that the proposed development is unlikely to have an impact on biodiversity and therefore no specific biodiversity conditions are required.

Bushfire

- The site is identified as being bushfire prone in accordance with Council's Bushfire Prone Land map in the CHLEP 2013.
- The Applicant submitted a Bushfire Hazard Assessment (BFHA) prepared by GeoLINK as part of the EIS.
- The BFHA assessed the development against Planning for Bushfire Protection (PBP) 2006, draft Planning for Bushfire Protection (PBP) 2017, Rural Fires Regulation 2013, Australian Standard 3959-2009 Construction of Buildings in Bush Fire Prone Areas and Building Code of Australia (BCA). The BFHA considered the development layout, existing vegetation, effective slope, local bush fire risk conditions and Fire Danger Index (FDI) detailed in PBP 2006 and draft PBP 2017.
- The BFHA found the development complied with bushfire protection measures detailed in PBP 2006 and draft PBP 2017, in respect of asset protection zones, internal roads, services (water, gas and electricity) and emergency and evacuation planning.
- During the exhibition of the EIS, RFS recommended conditions relating to asset protection zones, water and utilities, design and construction, access, evacuation and emergency management and landscaping.
- The Department's assessment concludes that subject to the recommended conditions of consent, the development would properly manage bush fire risks.

Require the Applicant:

- demonstrate compliance with PBP
- prepare and implement a Bushfire Emergency Response Plan.

Hazards and Risk

- The development includes two additional on-site LPG tanks along with the existing storages of LPG, oxygen, nitrous oxide and compressed air.
- The EIS found the development would be potentially hazardous according to the SEPP 33 screening, and a Preliminary Hazard Analysis (PHA) was undertaken by ARUP.
- The PHA shows that the societal risk associated with the LPG tanks is acceptable provided a firewall is constructed between the tanks and the CHH.

Require the Applicant:

- ensure the control measures and safeguards described in the PHA are implemented
- prepare an FSS prior to the commencement of detailed design
- maintain the firewall between the LPG tanks and the CHH.

Findings

Recommended Condition

- During the exhibition of the EIS, SafeWork NSW recommended the requirement for a Fire Safety Study (FSS) in the conditions of consent.
- The Department's hazards team has reviewed the development and considers the hazards and risk associated with the additional LPG tanks could be adequately managed via compliance with all relevant Australian Standards, implementation of all control measures described in the PHA and installation of automatic smoke detection and shutdown systems.
- The Department's assessment concludes the potential hazards associated with the development can be managed to ensure any adverse impacts on patients, visitors and workers within the CHHC are avoided.

Aboriginal Cultural Heritage

- Construction of the development has the potential to encounter aboriginal cultural heritage and remains.
- The EIS included an Aboriginal Heritage Assessment (AHA) prepared by Everick Heritage Consultants.
- The AHA found that the likelihood of Aboriginal objects occurring within the site is minimal. No aboriginal sites were identified during the field survey. Further, the site was defined as a disturbed land under the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW.
- The AHA concluded that prior to commencement of construction, no additional archaeological investigation was required.
- No submissions were raised regarding Aboriginal cultural heritage.
- The Department is satisfied appropriate consideration regarding Aboriginal cultural heritage has been provided.
- The Department has included the requirement for an Unexpected Finds Protocol in the recommended conditions of consent.

Require the Applicant include an Unexpected Finds Protocol in the CEMP.



7. Evaluation

The Department has assessed the development against the matters listed in section 4.15 of the EP&A Act and the objects listed in section 1.3 of the EP&A Act, including the principles of ESD. The Department has considered the development on its merits, taking into consideration the strategic plans that guide development in the area and the EPIs that apply to the development.

During the development process, the Applicant submitted a request to amend the development as part of the Response to Submissions (RtS) in accordance with Clause 55 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). The Applicant justified the request based on the identified shortfalls of a modern and sufficient Emergency Department and insufficient ICU bed capacity.

The Department reviewed the request and concluded the amended development would positively address the current shortfall experienced by the CHH and meet the growing demands for an up to date public hospital from the Mid North Coast Region. The Department is satisfied the Applicant has addressed the requirements of Clause 55 of the EP&A Regulation and agrees to the amendment.

The amended proposal has incorporated the advice of the GANSW and site context. The proposed building design could achieve design excellence and result in a new CSB building that has been designed and articulated to appropriately fit within its health service surrounds without having an adverse impact on the character of the locality. The public domain design would create an inviting environment and improve pedestrian movements through the CHHC site.

The development includes sufficient parking spaces to meet the estimated parking demands from patients, visitors and employees. The Department is satisfied that the additional traffic generated by the development would not adversely impact on the efficiency and safety of the local road network. Further, the Department notes the construction traffic impacts of the development on the existing CHH operations would be appropriately managed through the preparation and implementation of a CTPMP.

The Department acknowledges the Council's concerns about the potential flooding impacts of the development and has engaged flood experts at the OEH to review the FIAs submitted by the Applicant. The Department has recommended a number of conditions to ensure the new CSB would be designed and constructed with adequate mitigation measures in the event of a flood including during a PMF event.

The Department's assessment concluded there would be some amenity impacts during operation of the CHH, such as traffic impacts and flooding impacts. Therefore, the Department has recommended a number of conditions to minimise these impacts, including:

- development of a Construction Traffic and Pedestrian Management Plan and a Green Travel Plan to mitigate construction and operational traffic impacts
- preparation and implementation of a Flood Emergency Response Plan to manage flooding impacts
- preparation and implementation of management plans for noise and vibration, stormwater management and bushfire.

The development is consistent with key government strategic objectives for both the State and the Mid North Coast Region, including the NSW State Infrastructure Strategy 2018-2038 and North Coast Regional Plan 2036.

The development would facilitate a modern health services facility and improve the CHH's ability to deliver modern health services to the community. The development has a CIV of \$120 million and would create 290 construction jobs and 330 full-time equivalent operational jobs. Moreover, the development would be an anchor project that would enhance the role of the CHHC as a regional health industry hub and facilitate future expansion opportunities.

The Department concludes the impacts of the development can be appropriately managed through implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved, subject to conditions.



8. Recommendation

It is recommended that the Executive Director, Key Sites and Industry Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant consent to the application
- **agrees** with the key reasons for approval listed in the notice of decision
- **grants consent** to the application in respect of the Coffs Harbour Hospital Expansion (SSD 8981), subject to the conditions in the attached development consent
- **signs** the attached development consent and recommended conditions of consent (see **Appendix D**).

Recommended by:

Kelly McNicol
Team Leader
Industry Assessments

Recommended by:

Chris Ritchie
Director
Industry Assessments



9. Determination

The recommendation is: **Adopted by:**

Sargeant

Anthea Sargeant

28/2/19

Executive Director

Key Sites and Industry Assessments



Appendices

Appendix A – List of Documents

List of key documents relied on by the Department in its assessment:

- Environmental Impact Statement – Coffs Harbour Hospital Expansion, prepared by GeoLINK, dated 18 June 2018
- Response to Submissions Report – Coffs Harbour Hospital Expansion, prepared by GeoLINK, dated 8 October 2018
- Response to Submissions Supplementary Information – Coffs Harbour Hospital Expansion, prepared by GeoLINK, dated 29 November 2018
- Addendum to Review of Environmental Factors – Coffs Harbour Hospital Roadworks and Services Adjustment Works, prepared by GeoLINK, dated 24 August 2018

Appendix B – Relevant Supporting Information

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows.

1. Environmental Impact Statement
http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8981
2. Submissions
http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8981
3. Applicant's Response to Submissions – Coffs Harbour Hospital Expansion, prepared by GeoLINK, dated 8 October 2018
http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8981
4. Applicant's Response to Submissions Supplementary information
http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8981

Appendix C - Statutory Considerations

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department's environmental assessment.

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

Table 6 | SRD SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
3 Aims of Policy The aims of this Policy are as follows: (a) to identify development that is State significant development	The development is identified as SSD.	Yes
8 Declaration of State significant development: section 4.36 (1) Development is declared to be State significant development for the purposes of the Act if: (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and (b) the development is specified in Schedule 1 or 2.	The development is permissible with development consent. The development is a type specified in Schedule 1.	Yes
Schedule 1 State significant development—general (Clause 8 (1)) 14 Hospitals, medical centres and health research facilities 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).	The development comprises development for the purpose of a hospital and has a CIV in excess of \$30 million.	Yes

State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)

The Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development and providing for consultation with relevant public authorities about certain development during the assessment process.

The development constitutes traffic generating development in accordance with clause 104 of the Infrastructure SEPP as it will increase the Coffs Harbour Hospital bed capacity from 319 beds to 440 beds (increase of 121 beds)

and the site has access to a classified road (Pacific Highway). The Infrastructure SEPP requires traffic generating development to be referred to RMS for comment.

The Department has consulted and considered the comments from the relevant public authorities (refer to **Sections 5** and **6** of the report). The Department has included suitable conditions in the recommended conditions of consent (see **Appendix E**).

State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33)

SEPP 33 provides definitions of hazardous and offensive industries, aims to facilitate development defined as such and ensures that in determining developments of this nature, appropriate measures are employed to reduce impacts of the development.

SEPP 33 requires an assessment of hazardous materials, including a screening method based on the quantities of dangerous goods on a site, to assist in determining if a development is likely to be a potentially hazardous industry.

The development includes two additional on-site LPG tanks along with the existing storages of LPG, oxygen, nitrous oxide and compressed air. The EIS found the development would be potentially hazardous according to the SEPP 33 screening, and a Preliminary Hazard Analysis (PHA) was undertaken by ARUP. The PHA shows that the societal risk associated with the LPG tanks is acceptable provided a firewall is constructed to protect the hospital buildings.

During the exhibition of the EIS, SafeWork NSW recommended the requirement for a Fire Safety Study (FSS) in the conditions of consent. The Department considers the hazards and risk associated with the additional LPG tanks can be adequately managed via the recommendations in the PHA and provided by SafeWork NSW. The Department's recommended conditions formalising these recommendations.

State Environmental Planning Policy No 44 – Koala Habitat Protection (SEPP 44)

SEPP 44 aims to encourage the proper conservation and management of areas of natural vegetation that provide habitat for koalas to ensure a permanent free-living population over their present range and to prevent koala population decline. SEPP 44 applies to land that is potentially koala habitat and requires development to be consistent with an approved koala plan of management if land is identified as core koala habitat.

The Comprehensive Koala Plan of Management for south-east Lismore aims to minimise threats to koalas and their habitat as well as maintain and improve koala habitat. The land is not identified as containing any preferred koala habitat, does not contain any feed trees and has not been identified as being part of a koala movement corridor. Therefore, the development is not subject to the Koala Management Plan and is not inconsistent with the aims of the SEPP, which seeks to retain and conserve existing koala habitat. Accordingly, the development would not impact on koala habitat.

State Environmental Planning Policy No. 55 - Remediation of Land (SEPP 55)

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application. The EIS includes a Preliminary Contamination Assessment (PCA) undertaken by Coffey Geotechnics, prepared in accordance with the Contaminated Sites: Guidance for Consultants Reporting on Contaminated Sites and National Environmental Protection (Assessment of Site Contamination) Measure 1999 (as amended).

The PCA concluded that potential contaminants are below the Health Investigation Levels for commercial/industrial use, the site would be suitable for the ongoing use as a hospital and a Remedial Action Plan (RAP) would not be required.

During exhibition, the EPA flagged that the PCA indicated the Aboveground Storage Tanks (ASTs) for hydrocarbons were inappropriately stored which may have contaminated surrounding soil. Further, a holding tank under the emergency shower was undefined for location, size and discharge points. The EPA recommended the Applicant address potential soil contamination in the CEMP, including a progressive erosion and sediment control plan.

In its RtS, the Applicant noted the recommended CEMP requirements. Also, the Applicant advised the holding tank under the emergency shower would be decommissioned and replaced at a different location. Connecting to the sewer system via a trade waste agreement with Council would be investigated.

The Department considers contamination has been appropriately considered. In the recommended conditions, the Department has included the EPA's recommendations as well as the requirement for an unexpected finds protocol to ensure measures are in place should any contamination be found during works.

State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64)

SEPP 64 applies to all signage that under an EPI can be displayed with or without development consent and is visible from any public place or public reserve. SEPP 64 aims to ensure that signage is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations and is of high-quality design and finish.

The development includes six signs which will be erected at the key entry points for the new CSB and within the car parks. The six signs include one directional sign, two information signs and 3 secondary directional signs (see **Figures 13** and **14**).

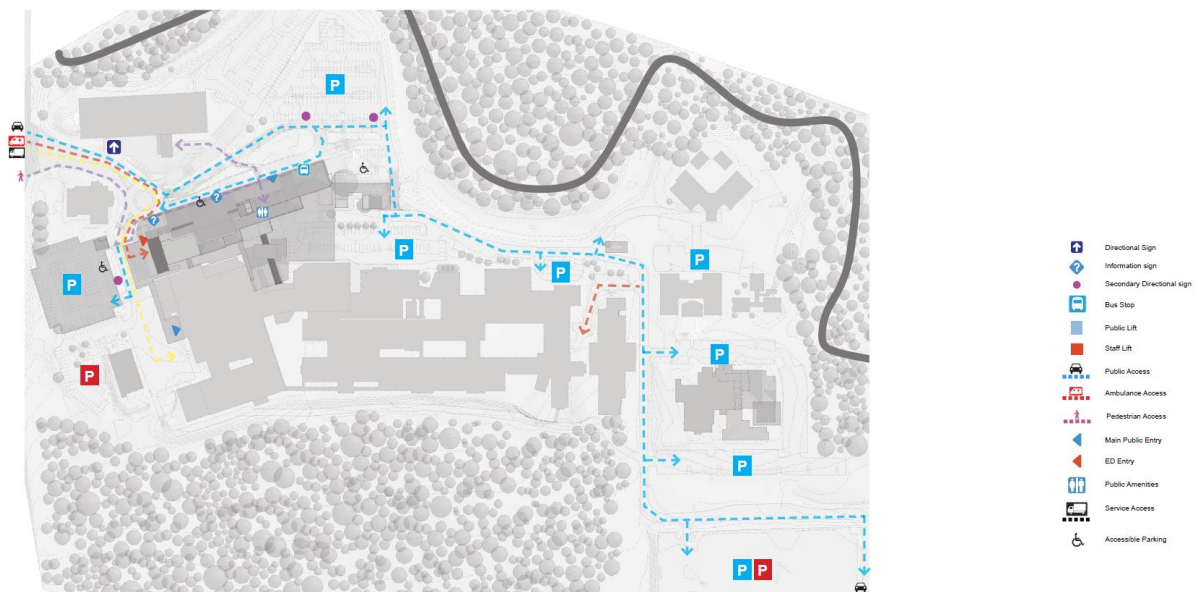


Figure 13 | Signage Locations Map

External Signage

A series of free standing pylon style signs will be used to identify main entry and exit points for both pedestrians and vehicles; these will include directions to key facilities such as Emergency.



Vehicle Directional Signs/Parking Totems

The site will include a series of vehicle directional signs and parking totems to indicate special parking zones.

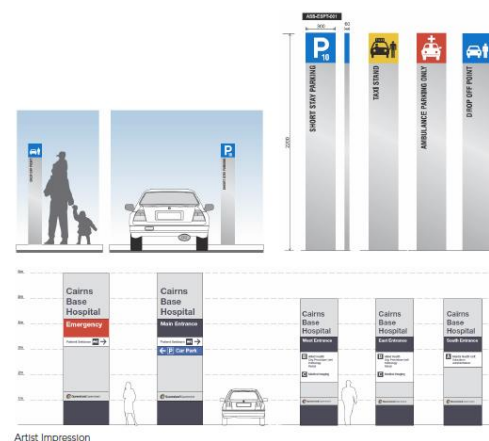


Figure 14 | Pylon Signage Designs

Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the development is consistent with the objectives of the SEPP 64 and with the assessment criteria which are contained in Schedule 1.

Table 7 below demonstrates the consistency of the proposed signage with these assessment criteria.

Table 7 | SEPP 64 Compliance Table

Assessment Criteria	Comments	Compliance
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 proposed signage is contemporary in design and consistent with the existing and future hospital use of the site.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	Existing building identification and wayfinding signage is present throughout the CHHC. The proposed new signage is consistent with NSW Health's Wayfinding for Healthcare Facilities guideline.	Yes
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 proposed signage is entirely within an established health care facility. The site is located adjacent to native conservation area and Newports Creek, but the development will not detract from the significance of these environmentally sensitive areas or the visual amenity of the locality.	Yes

Assessment Criteria	Comments	Compliance
	The design and function of the proposed signage is in keeping with the primary hospital use of the site and will assist with wayfinding throughout the public facility.	
3 Views and vistas		
Does the proposal obscure or compromise important views?	No views or vistas will be impacted by the proposed signage.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?	The proposed signage is mounted on the new CSB façade and pylons and will not dominate the skyline and reduce the quality of vistas.	Yes
Does the proposal respect the viewing rights of other advertisers?	Proposed signage will not impact on existing views experienced by others or existing advertising rights.	Yes
4 Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The proposed scale and design of the signage is appropriate for the streetscape and hospital precinct setting within which it is proposed.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The development will not impede the visual interest of the streetscape, setting or landscape given the function and design of the proposed signage are consistent with the existing health care use.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The development does not include advertising signage.	N/A
Does the proposal screen unsightliness?	Signage has been designed in keeping with the site's hospital use and NSW Health's Wayfinding for Healthcare Facilities guideline. Signage is proposed in locations to minimise clutter and convey simple messages to assist with wayfinding throughout the hospital precinct.	Yes
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	No signage is proposed above the main hospital buildings or existing vegetation.	Yes

Assessment Criteria	Comments	Compliance
Does the proposal require ongoing vegetation management?	No ongoing vegetation management will be required by the proposed signage.	Yes
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 scale and design of the signage is compatible with the site, the proposed new CSB and surrounding land uses.	Yes
Does the proposal respect important features of the site or building, or both?	New façade signage is proposed on the northern elevation of the new CSB and will not detract from the key form and characters of the site and building in material way. New pylon signage is located around the periphery of the site and strategically located to provide wayfinding for hospital users. New pylon signs set back from the setting of existing and new hospital buildings and will not detract from significant built form.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The proposed signage has been designed in accordance with the NSW Health's Wayfinding for Healthcare Facilities guideline. The guideline aims to design and improve wayfinding systems for healthcare facilities and ensure the experience of patients, visitors and staff at NSW hospitals are enjoyable and not stressful.	Yes
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?	Signage on the façade of the new CSB will be securely mounted to the façade and will not require safety devices or platforms.	Yes
7 Illumination		
Would illumination result in unacceptable glare? Would illumination affect safety for pedestrians, vehicles or aircraft?	Illumination is proposed to ensure the wayfinding function of the proposed signage is maintained throughout the 24/7 operational cycle of the CHH.	Yes

Assessment Criteria	Comments	Compliance
	The proposed intensity of illumination is not designed to result in glare impacts or light spill and would not result in safety impacts for pedestrians, vehicles or aircrafts.	
Would illumination detract from the amenity of any residence or other form of accommodation?	The proposed intensity of illumination is not designed to result in glare impacts or light spill.	Yes
Can the intensity of the illumination be adjusted, if necessary? Is the illumination subject to a curfew?	The proposed illumination of signage is intended to occur at all times consistent with the 24/7 operation of the hospital.	Yes
8 Safety		
Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The proposed design and location of signage is not envisaged to have an adverse impact on pedestrian or any public road.	Yes
Would the proposal reduce safety for any public road?		Yes

State Environmental Planning Policy (Coastal Management) 2018 (Coastal SEPP)

The Coastal SEPP aims to promote an integrated and co-ordinated approach to land use planning in the coastal zone by managing development in the coastal zone and protecting the environmental assets of the coast, establishing a framework for land use planning to guide decision-making in the coastal zone, and mapping the 4 coastal management areas (the coastal wetlands and littoral rainforests area, the coastal vulnerability area, the coastal environment area and the coastal use area) that comprise the NSW coastal zone for the purpose of the definitions in the Coastal Management Act 2016. The Coastal SEPP replaces former SEPPs 14, 26 and 71.

The development is consistent with the relevant Planning Principles of the SEPP and will not have any significant adverse impact on the environmental assets of the coast.

Proximity Area for Coastal Wetlands

The western part of the CHHC is mapped as a coastal wetland identified by the Coastal SEPP and the development footprint is located in the identified Proximity Area for Coastal Wetlands (see **Figure 15**).

Clause 11(2) of the Coastal SEPP requires the consent authority considers whether the proposed development in Proximity Area for Coastal Westlands will significantly impact on the biophysical, hydrological or ecological integrity of the adjacent wetland and the quantity and quality of surface and ground water flows to and from the adjacent coastal wetland.

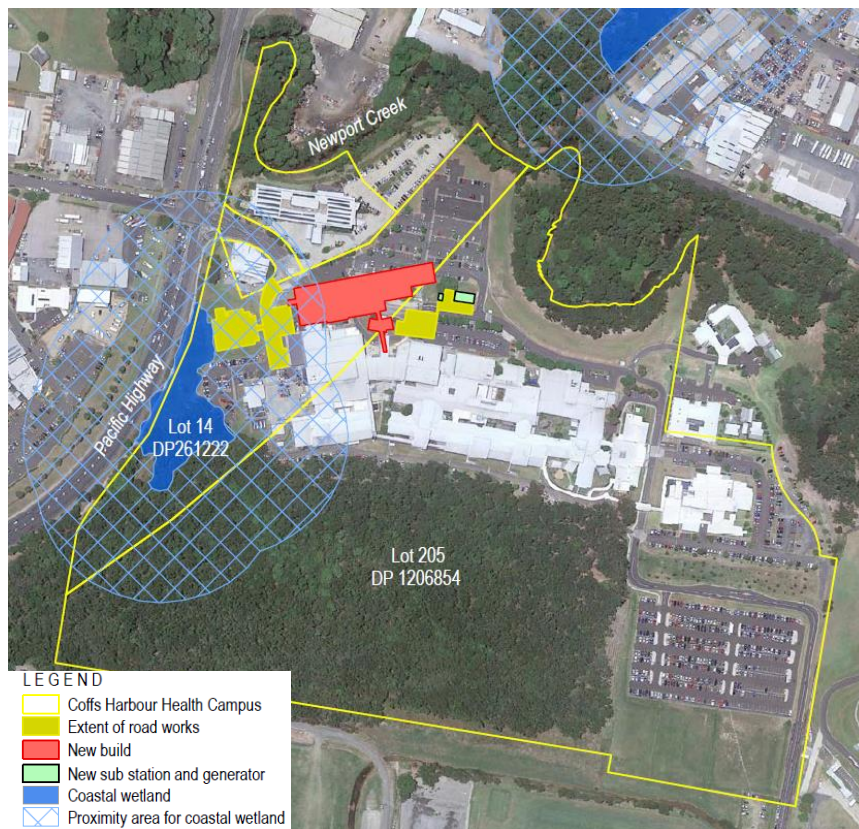


Figure 15 | Coastal Wetland and Littoral Rainforests Area Map with the Proposed Development Footprints Depicted

Coastal Environment Area and Coastal Use Area

The site is identified as Coastal Environment Area and Coastal Use Area under the Coastal SEPP (see **Figure 16**).



Figure 16 | Coastal Wetland and Proximity Area for Coastal Wetland

Clauses 13 and 14 of the Coastal SEPP sets out matters of consideration for consent authority during the development assessment. A detailed assessment is provided in **Table 8**.

Table 8 | Costal Environment Area and Coastal Use Area Assessment

Relevant Sections	Consideration and Comments	Complies
Clause 13 Development on land within the coastal environment area		
(1)(a) the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment,	The development is permissible with development consent. The development is a type specified in Schedule 1.	Yes
(b) coastal environmental values and natural coastal processes,	The development is within an existing hospital site which is a highly disturbed area. It is not considered that it will have an impact on the coastal environmental values and natural coastal processes.	Yes
(c) the water quality of the marine estate, in particular, the cumulative impacts of the proposed development on any of the sensitive coastal lakes identified in Schedule 1,	The development will not impact on any marine estates or coastal lakes.	Yes
(d) marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,	The development has no impacts on marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands or rock platforms.	Yes
(e) existing public open space and safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,	Not applicable	N/A
(f) Aboriginal cultural heritage, practices and places,	The EIS included an Aboriginal Heritage Assessment (AHA) prepared by Everick Heritage Consultants. The AHA found that the likelihood of Aboriginal objects occurring within the site is minimal. No aboriginal sites were identified during the field survey. Further, the site was defined as a disturbed land under the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW. The AHA concluded that prior to commencement of construction, no additional archaeological investigation was required.	Yes

Relevant Sections	Consideration and Comments	Complies
	The Department is satisfied appropriate consideration regarding Aboriginal cultural heritage has been provided. The Department has included the requirement for an Unexpected Finds Protocol in the recommended conditions of consent.	
(g) the use of the surf zone.	Not applicable	N/A
Clause 14 Coastal Use Area		
(1)(a) whether the proposed development is likely to cause an adverse impact on the following:		
(i) existing, safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,	Not applicable	N/A
(ii) overshadowing, wind funnelling and the loss of views from public places to foreshores,	The site is not located within foreshore areas and the development will not cause overshadowing, wind funnelling and the loss of views from public places to foreshores.	Yes
(iii) the visual amenity and scenic qualities of the coast, including coastal headlands,	The site is not located within proximity to the coast, including coastal headlands.	Yes
(iv) Aboriginal cultural heritage, practices and places,	The EIS included an Aboriginal Heritage Assessment (AHA) prepared by Everick Heritage Consultants. The AHA found that the likelihood of Aboriginal objects occurring within the site is minimal. No aboriginal sites were identified during the field survey. Further, the site was defined as a disturbed land under the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW. The AHA concluded that prior to commencement of construction, no additional archaeological investigation was required. The Department is satisfied appropriate consideration regarding Aboriginal cultural heritage has been provided. The Department has included the requirement for an Unexpected Finds Protocol in the recommended conditions of consent.	Yes
(v) cultural and built environment heritage.	The site within which the proposed development locates has been cleared for	Yes

Relevant Sections	Consideration and Comments	Complies
	existing developments. The site is not listed in the Australian Heritage Council database, the National Heritage List, Commonwealth Heritage list and the Register of the National Estate, the State Heritage Register, State Heritage Inventory and the Coffs Harbour local heritage listings. The development is considered not present risk to cultural and built environment heritage.	

Draft State Environmental Planning Policy (Remediation of Land)

The Draft Remediation SEPP will retain the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment.

Additionally, the provisions of the Draft Remediation SEPP will require all remediation work that is to be carried out without development consent, to be reviewed and certified by a certified contaminated land consultant, categorise remediation work based on the scale, risk and complexity of the work and require environmental management plans relating to post-remediation management of sites or ongoing operation, maintenance and management of on-site remediation measures (such as a containment cell) to be provided to council.

The Department is satisfied that the development will be consistent with the objectives of the Draft Remediation SEPP.

Draft State Environmental Planning Policy (Environment)

The Draft Environment SEPP is a consolidated SEPP which proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Willandra Lakes World Heritage Property. Once adopted, the Draft Environment SEPP will replace seven existing SEPPs. The proposed SEPP will provide a consistent level of environmental protection to that which is currently delivered under the existing SEPPs. Where existing provisions are outdated, no longer relevant or duplicated by other parts of the planning system, they will be repealed.

Given that the development is consistent with the provisions of the existing SEPPs that are applicable, the Department concludes that the proposed development will generally be consistent with the provisions of the Draft Environment SEPP.

Coffs Harbour Local Environmental Plan (CHLEP) 2013

The CHLEP 2013 aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Coffs Harbour City LGA. The CHLEP 2013 also aims to conserve and protect natural resources and foster economic, environmental and social well-being.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the CHLEP 2013 and those matters raised by Council in its assessment of the development (refer to **Section 5**). The Department concludes the development is consistent with the relevant provisions of CHLEP 2013. Consideration of the relevant clauses of the CHLEP 2013 is provided in **Table 9**.

Table 9 | Consideration of CHLEP 2013

CHLEP 2013	Department Comment/Assessment
Clause 2.7 Demolition requires development consent	The Applicant is seeking development consent for the demolition of existing helipads and structures from the site to facilitate the development of CSB.
SP2 Infrastructure – Health Services Facility zone	The development will continue the use of a hospital existing on site which is permissible with development consent under SP2 Infrastructure (Health Services Facility) zone.
Clause 4.3 Building height	The site is not subject to a maximum building height control under the CHLEP 2013. Consideration of the proposed built form and its maximum building height and objectives of section 4.3 of CHLEP has been provided in Section 6 of the report. The Department concludes that the proposed maximum building height of the new CSB is satisfactory.
Clause 7.1 Acid Sulphate Soils	The site is identified as a Class 3 land shown on the CHLEP 2013 Acid Sulphate Soils map. Carrying out works more than 1 metre below the natural ground surface or by which the water table is likely to be lowered more than 1 metre below the natural ground surface require a development consent. An Acid Sulphate Soil Management Plan (ASSMP) prepared by Coffey was submitted with the EIS. The ASSMP referred to the Department of Water and Conservation 1:25,000 Acid Sulphate Soil Risk Map that indicated the site was located in an area of low probability of acid sulphate soils (ASS) with the potential for ASS to occur from 1.0 to 3.0 metres below ground surface (mbgs) where the site elevation was between 2 and 4 m AHD.
Clause 7.2 Earthworks	The proposed earthworks for construction of the CSB and ancillary structures require a development consent. The level topography of the site allows minor earthworks are proposed to level the new CSB with the existing ground floor of CHH, services and landscaping. The proposed earthworks have been designed in conjunction with the overall site design and associated stormwater drainage works to ensure the development does not generate any adverse off-site environmental impacts.
Clause 7.3 Flood Planning	The site is affected by flooding and a detailed flooding impact assessment is provided in Section 6.3 of this report.

Other policies

In accordance with Clause 11 of the SRD SEPP, Development Control Plans do not apply to State significant development. Despite this provision, consideration of the relevant development controls contained within Coffs Harbour Development Control Plan (CHDCP) 2015 is provided in **Table 10**.

Table 10 | Consideration of CHDCP 2015

CHDCP 2015	Department Comment/Assessment
Part E Environmental Controls	
E4.6 Flood Planning Requirements – Essential Facilities	In accordance with CHLEP 2013, hospitals are defined as essential facilities. The Applicant submitted flooding impact assessment reports prepared by Bonacci Group. The flooding impact assessment found that identified 1% AEP flood level at the west and east of the CHHC was approximately RL 5.6m and RL 3.7 m respectively, the ground floor level of CSB building was set at RL 5.9 m which was at or above the Probable Maximum Flood (PMF) level and would be protected from the PMF level by road kerbs. The Department is satisfied that the Applicant has demonstrated the expanded CHH including its operational components has a minimum floor level above the identified PMF levels that meets the requirements of CHDCP 2015.
Part F General Development Controls	
F1.5 On-Site Parking – Non-Residential Uses	In accordance with Part F1.5 of the CHDCP 2015, one parking space per 2 beds is required. The development therefore requires additional 61 spaces for the net increase of 121 beds and a total of 220 spaces for the expanded CHH. The CHDCP does not set requirements for employee and ambulance parking. CHH currently has 1,133 off-street parking spaces that will not change under the development. The development meets the requirement of CHDCP 2015 in respect of onsite parking spaces.
F3.1 Landscaping	New landscaping, including tree planting, is proposed in two new internal courtyards, main entrance forecourt and along the site's frontages to assist with softening the proposed building bulk and expanse of car parking hardstand areas. The development addresses role of CHC as a critical civic infrastructure for the community, creating sense of place and respecting human scale, connecting existing and proposed hospital buildings alongside softening built form and hardstand areas. The proposed landscaping also considers site context including existing land use patterns and native vegetation as well as applies Crime Prevention Through Environmental Design (CPTED) Principles.
F5.1 Signage Requirements – General	The proposed signage has been designed to provide necessary business identification and wayfinding for ongoing operation of CHH. The proposed signs are of high quality, complement the proposed new CSB built form and character of CHHC. The development includes 6 signs with appropriate size that has minimised potential impacts of visual clutter in site vicinity and will not obscure architectural features of the new CHH building. The proposed signage is designed in accordance with Ministry of Health's Wayfinding for Healthcare Facilities Policy 2014 which ensures the proposed signs are facilitated with standard sizes, sign contents, colours and materials adopted across public hospitals in NSW. Therefore, the proposed signs will not mislead or be misread by members of the public as traffic directory signs or cause detriment to traffic safety.

CHDCP 2015		Department Comment/Assessment
F6 Management	Waste	Appropriate waste and recycling facilities would be located within the service areas of the development. The Department has included recommended conditions to ensure these areas are appropriately designed and constructed.

Appendix D – Recommended Instrument of Consent