



Coffs Harbour Hospital Modification 1

State Significant
Development
Modification Assessment
(SSD 8981 MOD 1)

August 2019

© Crown Copyright, State of NSW through its Department of Planning, Industry and Environment 2019

Disclaimer

While every reasonable effort has been made to ensure this document is correct at time of printing, the State of NSW, its agents and employees, disclaim any and all liability to any person in respect of anything or the consequences of anything done or omitted to be done in reliance or upon the whole or any part of this document.

Copyright notice

In keeping with the NSW Government's commitment to encourage the availability of information, you are welcome to reproduce the material that appears in Coffs Harbour Hospital Modification 1 Assessment Report. This material is licensed under the Creative Commons Attribution 4.0 International (CC BY 4.0). You are required to comply with the terms of CC BY 4.0 and the requirements of the Department of Planning, Industry and Environment. More information can be found at: <http://www.planning.nsw.gov.au/Copyright-and-Disclaimer>.



Glossary

Abbreviation	Definition
AHD	Australian Height Datum
BCA	Building Code of Australia
CIV	Capital Investment Value
CIP	Community Involvement Plan
Consent	Development Consent
Council	Coffs Harbour City Council
Department	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue NSW
LEP	Local Environmental Plan
Minister	Minister for Planning and Public Spaces
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning, Industry and Environment
SEPP	State Environmental Planning Policy
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
SSD	State Significant Development
TfNSW	Transport for New South Wales
TfNSW(RMS)	Transport for NSW (Roads and Maritime Services)



Contents

Glossary	iii
1. Introduction	1
1.1 Site Description	1
1.2 Approval History	1
2. Proposed Modification	3
3. Strategic Context	4
4. Statutory Context	5
4.1 Scope of Modifications	5
4.2 Mandatory Matters for Consideration	5
4.3 Consent Authority	5
5. Engagement	6
5.1 Department's Engagement	6
5.2 Council Submission	6
6. Assessment	7
7. Evaluation	10
8. Recommendation	11
9. Determination	12
Appendices	13
Appendix A – List of Documents	13
Appendix B – Instrument of Approval	14



1. Introduction

This report provides an assessment of an application to modify the State significant development consent (SSD) for the redevelopment of Coffs Harbour Hospital (SSD 8981).

The modification application seeks approval to delete condition D12 – car parking.

The application has been submitted by GeoLink on behalf of Health Infrastructure (the Applicant) pursuant to section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act).

1.1 Site Description

The Coffs Harbour Hospital Campus is located at 345 Pacific Highway in the Coffs Harbour local government area. The expansion approval SSD 8981 included construction of a new Clinical Services Building, construction of relocated car parking spaces, associated roadworks, infrastructure and service work and refurbishment of the various existing buildings located on the site. The site is situated 3km southwest of Coffs Harbour, 2km west of Coffs Harbour Airport and situated east of a service centre as depicted in **Figure 1**.



Figure 1 | Site location (Source: Nearmaps)

1.2 Approval History

On 28 February 2019, development consent was granted by Executive Director, Key Sites and Industry for the development of the Coffs Harbour Hospital Expansion SSD 8981. The development consent permits the following works:

- construction of a new five storey Clinical Services Building (CSB) with a total gross floor area of 15,238 square metres and refurbishment works to the existing Coffs Harbour Hospital Main Building A.

- construction of a new ambulance bay.
- landscaping and public domain works.
- installation of a business identification and wayfinding signage.
- construction of a new bus stop.
- ancillary infrastructure and services works.

REF approval No. 010/2014 was approved on 28 September 2019, and comprised:

- construction of 780 on-grade car parking spaces across two stages: consisting of Stage 1 – 461 spaces; and Stage 2 – 319 spaces.
- construction of a 6.5 metre sealed pavement access way from Phil Hawthorne Drive and the CHHC to the car park.
- footpath/pedestrian link between car park and the health campus.
- earthworks including the introduction of fill to construct the proposed car park.
- awnings to protect users from the elements.
- lighting and electrical infrastructure.
- erection of security fencing around the car park.
- stormwater infrastructure.

The Stage 1 carpark has been completed and is operational (see **Figure 1**). The Applicant has detailed that the delivery of Stage 2 is subject to future funding.



2. Proposed Modification

On 20 June 2019, the Applicant lodged a modification to amend the consent under Section 4.55 (1A) of the EP&A Act.

The application seeks to delete condition D12 to remove the requirement to deliver the Stage 2 REF carpark (319 car spaces) prior to the commencement of operation of the new CSB approved under SSD 8981. The deletion of condition D12 is sought as the parking demand for the CSB development can be met by the existing parking provided on campus.

Condition D12 currently reads as follows:

Car Parking

D12. Prior to the commencement of the operation, the Applicant must construct and operate 319 car parking spaces in the Stage 2 of the at-grade car park approved by the Health Infrastructure on 24 September 2014 (Review of Environmental Factors Approval No. 010/2014).



3. *Strategic Context*

The proposed modified consent would remain consistent with:

- North Coast Regional Plan 2036.
- NSW Future Transport Strategy 2056 and State Infrastructure Strategy 2018-2038.



4. Statutory Context

4.1 Scope of Modifications

The Department has reviewed the scope of the modification application and considers that the application can be characterised as a modification involving minimal environmental impacts as the proposal:

- would not increase the environmental impacts of the project as approved.
- is substantially the same development as originally approved.
- under the EPA Regulation 2000 Clause 117(3B), this project was not required to be exhibited, however it was made publicly available on the Departments website and referred to TfNSW(RMS), TfNSW and Council for comment.
- would not involve any further disturbance outside the already approved disturbance areas for the project.

Therefore, the Department is satisfied the proposed modification is within the scope of section 4.55(1A) of the EP&A Act and does not constitute a new development application. Accordingly, the Department considers that the application should be assessed and determined under section 4.55(1A) of the EP&A Act rather than requiring a new development application to be lodged.

4.2 Mandatory Matters for Consideration

The Department conducted a comprehensive assessment of the project against the mandatory matters for consideration as part of the original assessment of SSD 8981. The Department considers this modification application does not result in significant changes that would alter the mandatory matters for consideration under section 4.15 of the Act and conclusions made as part of the original assessment.

4.3 Consent Authority

The Minister for Planning and Public Spaces is the consent authority for the application under section 4.5(a) of the EP&A Act. However, under the Minister's delegation dated 11 October 2017, the Director, Social and Infrastructure Assessments, may determine the application as:

- the relevant local council has not made an objection.
- a political disclosure statement has not been made.
- public exhibition of the application was not required and therefore there are no public submissions objecting to the proposal.



5. Engagement

5.1 Department's Engagement

Clause 117(3B) of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) specifies that the notification requirements of the EP&A Regulation do not apply to State significant development. Accordingly, the application was not notified or advertised. However, it was made publicly available on the Department's website on 25 June 2019, and was referred to Coffs Harbour Council (Council), TfNSW(RMS) and TfNSW for comment.

TfNSW(RMS) and TfNSW raised no objections to the proposed modification.

Council raised concern with the parking on site which is detailed in **Section 5.2**.

5.2 Council Submission

On 16 July 2019, Council provided comments to the Department, based on a review of the submitted documents and the three parking surveys for the site, PTC (2013), SECA Solutions (2018) and GTA (2019). Council identified that the additional parking stipulated in condition D12 of the consent is warranted and should remain.

Upon review of the parking surveys Council determined that a change in parking pattern was evident and is a result of the introduction of paid parking on the hospital campus. Due to the scheme being introduced, the Applicant has argued that the results of the SECA Solutions (2018) and GTA (2019) surveys, showed significantly different results to that surveyed by PTC (2013). This change has been shown to be due to cars parking in locations other than on the hospital campus to avoid paying for parking. This shift in parking behaviour has resulted in the surveys suggesting that there is sufficient parking capacity available onsite to accommodate future growth (SECA Solutions (2018) and GTA (2019)).

However, Council is of the opinion that as a result of the introduction of paid parking on site that parking has now moved over to the Service Centre and industrial estate and pedestrians are crossing the main arterial road to get to the hospital. It is therefore Council's opinion that the results from PTC (2013) regarding future growth are still applicable, especially as a majority of the parking was generated by staff at the time of the survey. In addition, the survey by PTC (2013) identified that the full-time equivalent number of staff will increase by 333 by 2026/27, when all new services are expected to be fully operational. Further, Council states that the SECA Solutions (2018) and GTA (2019) reports underestimated the parking demand increase by relying on a parking rate provided in Guide to Traffic Generating Developments (RMS), as opposed to specific site information available, which indicates a higher rate for the campus is necessary.

Council requests the following recommendations regarding the management of parking across the campus:

- delivery of the Stage 2 carpark (via retention of condition D12).
- refinement of the fee structure to allow three hours free across the site.
- provide further designated staff car parking (at a discounted rate or free).



6. Assessment

Approval is sought to delete condition D12, removing the requirement to provide 319 additional car spaces prior to the commencement of operation of the CSB.

The Applicant has requested the deletion of the condition on the basis of the following justification:

- surveys of the hospital carparks have concluded that there is sufficient existing car parking on the hospital campus even with the anticipated increase in parking demand created by the new CSB and the on-street parking demand of 75 spaces from Phil Hawthorne Drive.
- the approved development (SSD 8981) would not change from what was originally granted as the modification does not involve any other aspect of approved development.

SSD 8981 was approved on 28 February 2019, imposing condition D12. The details of the original application identified that there was an increase from 319 beds to 440 beds and the proposed CSB building would result in an additional 333 staff by 2026/27, resulting in increased parking demand. The 2013 traffic survey by PTC identified that there were 671 parking spaces on-site, however there was a shortfall in parking of approximately 450 spaces as there was a demand generated for 1,100 parking spaces (and a future demand was 1,400 spaces).

The REF (No. 010/2014) approval consisting of two stages, provided 462 spaces as part of the first stage, alleviating the previous car parking shortfall and demand created from the CSB. At completion of the Stage 1 car park, the car parking provided on the campus consisted of 1,133 spaces (across seven car parks/parking zones). Stage 2 of the REF approval (when delivered) will provide an additional 319 spaces to accommodate future growth.

As part of the SSD approval, 118 car spaces were proposed for reallocation to accommodate the location of the new CSB, located adjacent to the new main entrance (25 spaces) and in the new western car park (93 spaces, 8 accessible spaces). The SECA Solutions parking survey identified that 131 car spaces were required to satisfy the long-term demand for the hospital and that there were between 306-368 vacant spaces throughout the day, resulting in the demand being managed through the existing parking provisions.

In its determination of SSD 8981, the Department determined that presently the hospital campus has sufficient parking provision for patients, visitors and employees due to the construction of the Stage 1 REF car park. However, to accommodate future growth, the Department imposed a condition of consent requiring the Applicant construct and operate the Stage 2 car park prior to the occupation of the CSB, with the aim to ensure that the hospital campus has as an adequate supply of parking to avoid over saturation.

As part of this modification request the following documents (**Appendix A**) were submitted to support the deletion of condition D12:

- a Parking and Traffic Consultants (PTC) (2013) report titled *Coffs Harbour Hospital Updated Parking Demand Study*.
- GeoLINK (2014) report *Review of Environmental Factors- Coffs Harbour Health Campus Car Park*.
- GTA Consultants (2019) letter report – *Coffs Harbour Hospital Expansion – External Parking Demand Analysis*.

The most recent traffic survey by GTA Consultants submitted as part of MOD 1 was undertaken over five days (Monday to Friday, September 2018) to assess the impact of not constructing the additional 319 car parking spaces as part of Stage 2 of the REF at this time. The traffic survey identified that the site currently provides 1,128 car parking spaces overall. Of these spaces there are currently 118 which are unavailable as works have commenced for the new entrance to the hospital (under SSD 8981).

While the parking survey was undertaken in September 2018, the new works began in early May 2019, and these works have impacted on the car parking provided within Car Park A. The car parking affected in Car Park A will be offset to the western side of the hospital building known as Car Park E (**Figure 2**), as approved as part of SSD 8981.

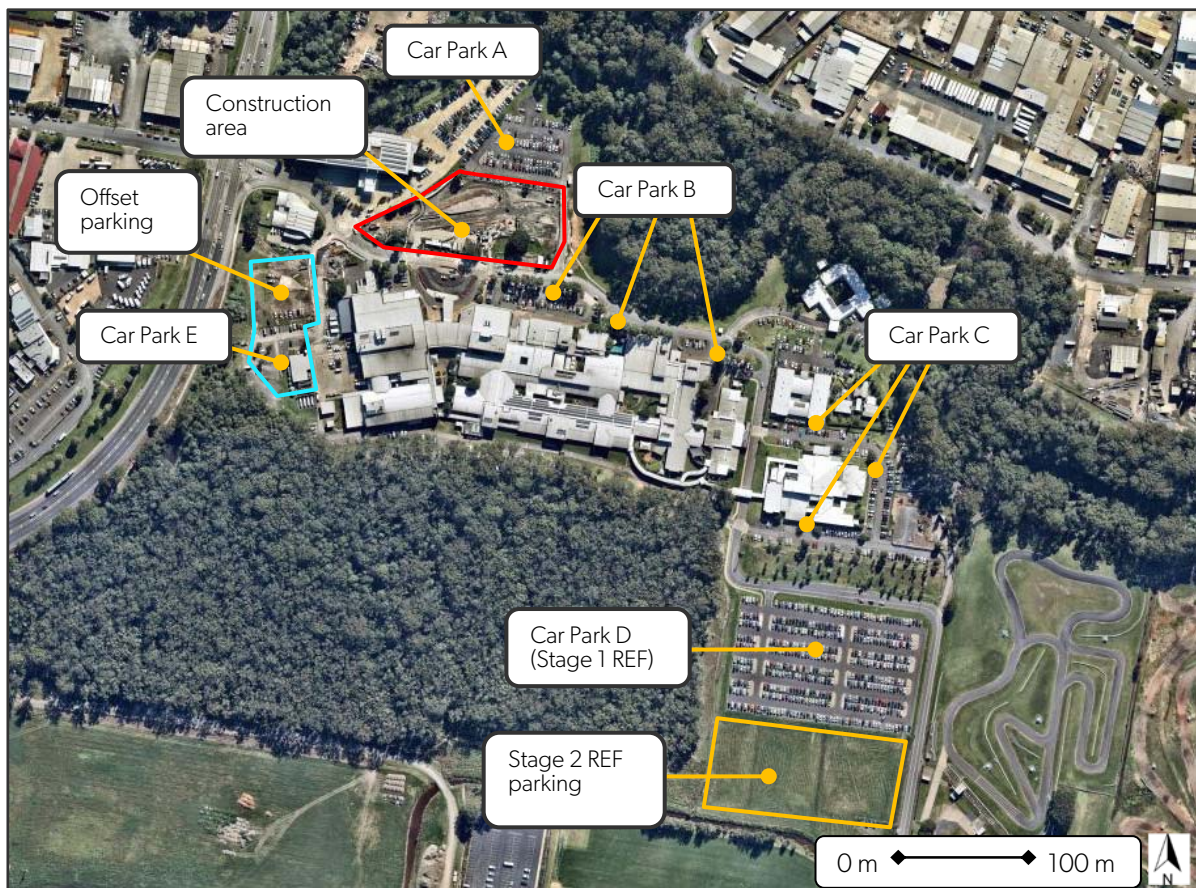


Figure 2 | Car park areas (Base source: Nearthmaps 2019)

Substantial car parking is provided on-site as per the GTA Consultants (2019) report, which identifies that between 680 and 850 car spaces are occupied on each day. This leaves a total of 280 spaces available across the campus covering the required future demand of 130 spaces and the surrounding on-street demand.

The Applicant has stated that the construction of the Stage 2 car park will not occur prior to the operation of the new CSB (as conditioned within the consent for SSD 8981) as funding is yet to be secured for the delivery of the car park.

In its submission on the proposed modification Council provided a comparison of the two parking surveys (PTC 2013 and GTA 2019) submitted with the modification application and the survey prepared by SECA Solutions (2018) as part of the original SSD application. This comparison is detailed below in **Table 1**, which demonstrates the changes to peak parking demand as a result of the introduction of paid parking on the campus (introduced in 2015).

Table 1 | Parking survey comparison

Parking Survey Reference	Peak Parking Demand On-Site	Spaces Available On-Site	Peak Parking Utilisation at Main Carpark A	Vacant Spaces in Main Carpark A
PTC (2013)	974	671	123%	0
SECA Solutions (2018)	856	1,133	46%	169
GTA Consultants (2019)	848	1,128	56%	134

It is Council's opinion that the change in peak parking demand within the site is a direct result of the introduction of paid parking and has resulted in an increased car parking vacancy on-site with patrons of the hospital now parking over at the Highway Service Centre/industrial estate (see **Figure 1**) to avoid using the paid parking on-site. Council does not believe that the introduction of paid parking has influenced modal split.

The Applicant submitted an RtS, providing clarification on the car parking demand, road safety, parking provisions and ability to accommodate future growth issues as raised by Council. The Applicant states that car park pricing is in accordance with the NSW Health *Hospital Car Parking Fees Policy* (Policy Directive 2013_031) and is an effective travel demand management initiative, as there has been a reduction in car parking demand since the PTC (2013) parking survey. The car parking rates for Coffs Harbour Hospital are detailed on the Mid North Coast Local Health District website identifying a variety of eligible visitors and patients for ticket validation and concession rates, maxing out at \$10 for a 7 day ticket. Regular rates are 30 mins free, \$5 for 24 hours and \$10 for a weekly pass.

Further, crash data (from 2013 to 2017) for the Pacific Highway/Isles Drive intersection indicated that there is no issue related to road safety and pedestrians crossing the Pacific Highway to access the hospital and signage is located throughout the Service Centre car park aiming to minimise hospital users utilising the Service Centre parking. It was also stated that a higher parking provision is not considered appropriate as some staff may have adjusted their travel habits to utilise car-pooling, drop-off/pick-up and alternative travel modes following implementation of the current on-site parking controls and internal bus routes. This would not have a direct transfer of on-site parking demand to the surrounding streets which needs to be accommodated on-site.

Further, in response to previous Council concerns, GTA subsequently completed a further assessment of the existing on-street car parking demand in close proximity to the hospital. This assessment identified an on-street parking demand of approximately 75 spaces on or adjacent to Phil Hawthorne Drive, however it was concluded that the available on-site car parking supply could accommodate these 75 vehicles, as well as the anticipated additional parking demand generated by the campus, without the need to provide further parking on-site.

The Department is satisfied that the hospital parking supply is capable of accommodating the additional parking demand of 135 spaces associated with SSD 8981 and the 75 on-street spaces along Phil Hawthorne Drive. Whilst Council raised concerns with the utilisation of the Service Centre car parking by hospital employees and visitors, introducing the additional 319 car parking spaces will not alter the current parking usage pattern on site. As there are spaces available within the current car park as per the parking survey conducted by GTA consultants, the existing parking is capable of accommodating for hospital growth, and the car parking prices for the hospital are considered reasonable and consistent with NSW Health's car parking policy on public hospital sites. The Department recommends a condition ensuring all car parking areas (i.e. Carpark E/Offset parking in **Figure 2**), excluding the REF Stage 2 carpark, are completed prior to operation of the new CSB, so that adequate parking is available. As future hospital expansion occurs, the parking approved as part of the REF Stage 2 can be completed when necessary.



7. *Evaluation*

The Department has reviewed the proposed modification and assessed the merits of the modified proposal, and all environmental issues associated with the proposal have been thoroughly addressed.

The Department accepts that condition D12 requires car parking which is not required at this stage of the development. However, to ensure the existing car parking meets its current performance, condition D12 has been recommended for modification rather than deletion to maintain car parking provisions in-line with reasoning behind the inclusion of condition D12 as part of SSD 8981 approval.

The development as modified would be substantially the same as that originally approved and would deliver a significant public benefit through the continued provision of improved health care in the area.

The Department considers the development is in the public interest and the modification application should be approved.



8. Recommendation

It is recommended that the Director of Social and Infrastructure Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report.
- **determines** that the application SSD 8981 MOD 1 falls within the scope of section 4.55(1A) of the EP&A Act.
- **forms the opinion** under section 7.17(c) of the Biodiversity Conservation Act 2016, that a biodiversity development assessment report is not required to be submitted with this application as the modification will not increase the impact on biodiversity values on the site.
- **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.
- **modify** the consent SSD 8981.
- **signs** the attached approval of the modification.

Recommended by:

Ingrid Berzins

Planning Officer

Social and Infrastructure Assessments

Recommended by:

David Gibson

Team Leader

Social Infrastructure



9. Determination

The recommendation is: **Adopted by:**

Karen Harragon

Director

Social and Infrastructure Assessments



Appendices

Appendix A – List of Documents

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

1. Environmental Assessment

<https://www.planningportal.nsw.gov.au/major-projects/project/13406>

Appendix B – Instrument of Approval