

11 January 2018

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

Dear Ms McNally

Wagga Wagga Rural Referral Hospital Redevelopment Stage 3 - Request for Secretary's Environmental Assessment Requirements

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

Background and Recent Development

Wagga Wagga Rural Referral Hospital (WWRRH) is a major Rural Referral hospital, located in southern central New South Wales within the Murrumbidgee Local Health Network (MLHN).

The redevelopment of WWRRH represents a strategic capital investment in the health infrastructure of the Local Health Network and NSW Health. The overall objective is to provide a contemporary healthcare facility suited to the current and future needs of the catchment population.

Stage 1 and 2 of the Hospital's redevelopment has already been completed. Stage 1, the Mental Health Facility, was completed in 2011. Stage 2, the Acute Services Building, was completed at the end of 2015.

Stage 3 will bring to fruition the benefits of the overall hospital redevelopment for the delivery of contemporary, well-integrated health services for the people of Wagga Wagga and the wider service catchment area.

The project has a Capital Investment Value of approximately \$170m.

The Site

Site Location and Context

The WWRRH is located approximately 1km from the CBD with good access via bus or taxis adjacent to the railway station. Walking time from the CBD is approximately 20-25 minutes. The main vehicular access from the CBD is via Edward Street.

The redevelopment will be entirely within the existing WWRRH campus which is bounded by Rawson Lane to the south, Docker Street to the west and Edward Street to the north. To the east, the site adjoins existing residential and commercial properties.



Figure 1 – Locality Plan

The site has an area of approximately 4.2 hectares on the main campus. The topography of the site is predominantly flat with a fall towards the Edward and Docker Streets corner of around 3.6 metres. There are scattered trees and grassed areas on the site.

The property is legally described as Lot 334 in DP 1190643 (Figure 2).



*Figure 2 – Wagga Wagga Rural Referral Hospital – Lot 334 DP 1190643 outlined in red
Source (Six Maps)*

The existing layout of the Hospital Campus indicating location of completed stage 1 and 2 works is shown at Figure 3.

The main public vehicular access route to car parking, the Main Hospital entry and Emergency Department is directly off Sturt Highway/Edwards Street down Lewis Drive. Emergency vehicles access the ambulance drop off bay at the Acute Services Building from Lewis Drive and Rawson Lane.



Figure 3 Existing Hospital Layout – Stage 1 and 2 works (complete)

Existing Development

Wagga Wagga Rural Referral Hospital is an existing health services facility. There are many diverse, old and ad-hoc buildings on the site which have numerous extensions. In more recent years the hospital has been redeveloped with a new Mental Health building and Acute Services Building being constructed. The Acute Services Building rises to six storeys with a helipad above providing regional access by helicopters. A perspective of the Acute Services Building is shown at Figure 4.

At grade car parking is generally dispersed across the campus with the larger car parks located to the north and north-east of the campus.

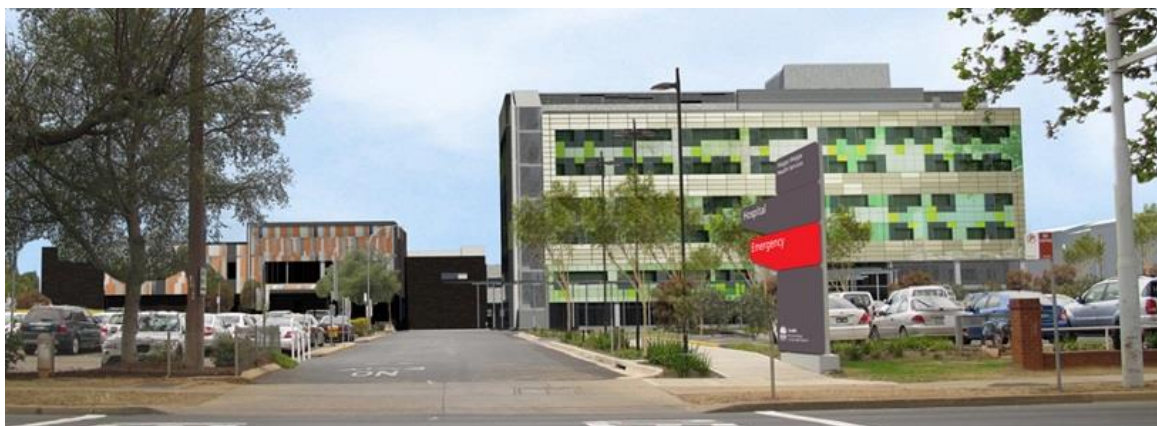


Figure 4 Perspective – Acute Services Building (Source: Department of Health)

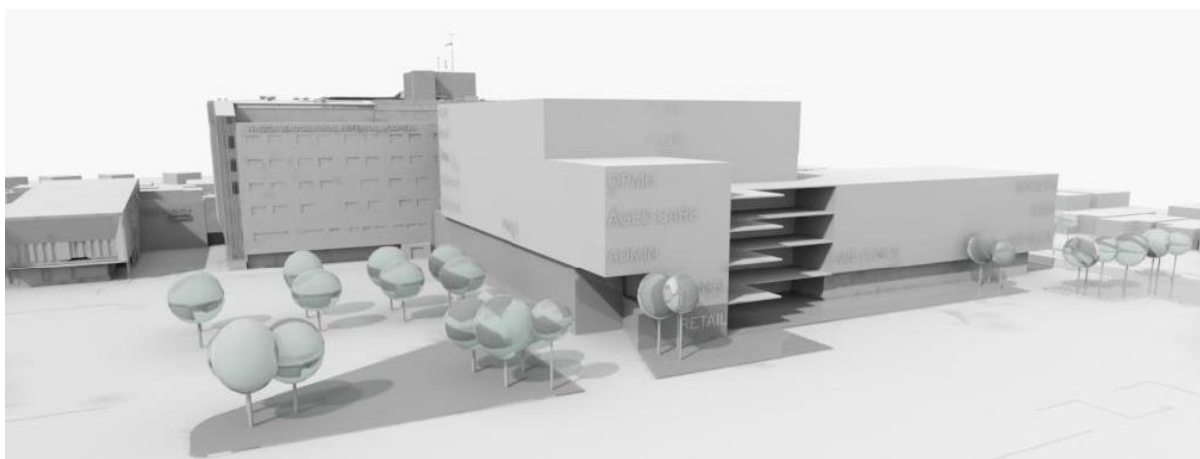


Figure 6 Proposed Stage 3 Massing Plan – North East Perspective (Source: Martin and Ollmann Architects)



Figure 7 Proposed Stage 3 Massing Plan – North-West Perspective (Source: Martin and Ollmann Architects)

Strategic Context and Need for the Redevelopment

NSW: Making it Happen was released in September 2015 and replaces the State's previous 10 year plan, NSW 2021. NSW: Making it Happen outlines 30 key reforms for the State, including 12 personal priorities of the Premier.

The Premier's Priorities are key priorities for the NSW Government which identify 12 key areas of focus to rebuild the economy, return quality services, renovate infrastructure, strengthen our local environment and improve education, health and community services.

Of particular relevance to the Stage 3 redevelopment of WRRH are the priorities to:

- improve access to quality healthcare
- improve survival rates and quality of life for people with potentially fatal or chronic illness through improvements in health care
- maintain and invest in infrastructure

Development of these services in regional areas, in particular, is a significant capital investment and results in employment opportunities. Projects will also contribute to achievement of the following priorities:

- jobs closer to home
- increased business investment in rural and regional NSW
- increased business investment

State Infrastructure Strategy - The 'State Infrastructure Strategy Update 2014' was prepared by Infrastructure NSW at the direction of the Premier to guide how proceeds from the Rebuilding NSW initiative could be spent. The 30 major projects and programs have been identified as strategically important and economically sound. The NSW Government has accepted the following recommendations in relation to health investment:

- Reserve \$300 million to accelerate the delivery of multipurpose health facilities in smaller country towns.
- Reserve \$100 million to invest in up to 19 'one stop shops' facilitating health care in metropolitan and regional areas.
- Pursue a mix of not-for-profit/private sector delivery of infrastructure and public health services.
- Prioritise configurations that implement best practice clinical redesign and reduce operating costs.
- Continue to pursue partnerships for a better mix of services with the not-for-profit and private sectors.
- Continue to pursue system-wide reforms to deliver more efficient and effective health services.

The proposed Stage 3 WWRRH redevelopment is consistent with these recommendations.

Riverina Murray Regional Plan 2036 - The Riverina Murray Regional Plan (2017) outlines the NSW Government's vision, goals and actions for the sustainable growth of this Region to 2036.

The aims of the Regional Plan is to guide the delivery of homes, jobs, infrastructure and services to support the growing and changing needs of the Riverina Murray Region. It sets directions for regional growth to achieve sustainable development outcomes that are balanced with environmental values. It aims to protect and restore environmental values and connections to the landscape, to contribute to healthy, engaged communities.

The redevelopment of WWRRH is consistent with the Strategic Planning Framework for the Region. In particular, Direction 5: Support the growth of the health and aged care sectors.

The Regional Plan highlights that the NSW Government is supporting the Riverina Murray economy and communities through the infrastructure investments including the redevelopment of WWRRH.

Planning Context

Environmental Planning and Assessment Act 1979

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

Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) aims to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development. The BC Act replaces the *Threatened Species Conservation Act 1995* (TSC Act) as the key piece of legislation that identifies and protects threatened species, populations and ecological communities in NSW.

There are several obligations placed on HI under the BC Act in relation to the Proposal. HI must consider threatened species, populations, ecological communities, habitat, key threatening processes, offsets and recovery plans in fulfilling its statutory responsibilities.

It is noted that the site located is in the urban area of Wagga Wagga. It is a generally cleared, without vegetation other than lawn and planted trees.

State Environmental Planning Policy (State and Regional Development) 2011

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

Development that has a capital investment value of more than \$30 million for any of the following purposes:

- a) hospitals,*
- b) medical centres,*
- c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).*

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

Other Planning Policies

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

- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33);
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55);
- State Environmental Planning Policy Infrastructure 2007 (SEPP Infrastructure).

Local Environmental Plan

Permissibility

The site is zoned SP2 Infrastructure (Hospital) under the *Wagga Wagga Local Environmental Plan 2010* (WWLEP 2010).

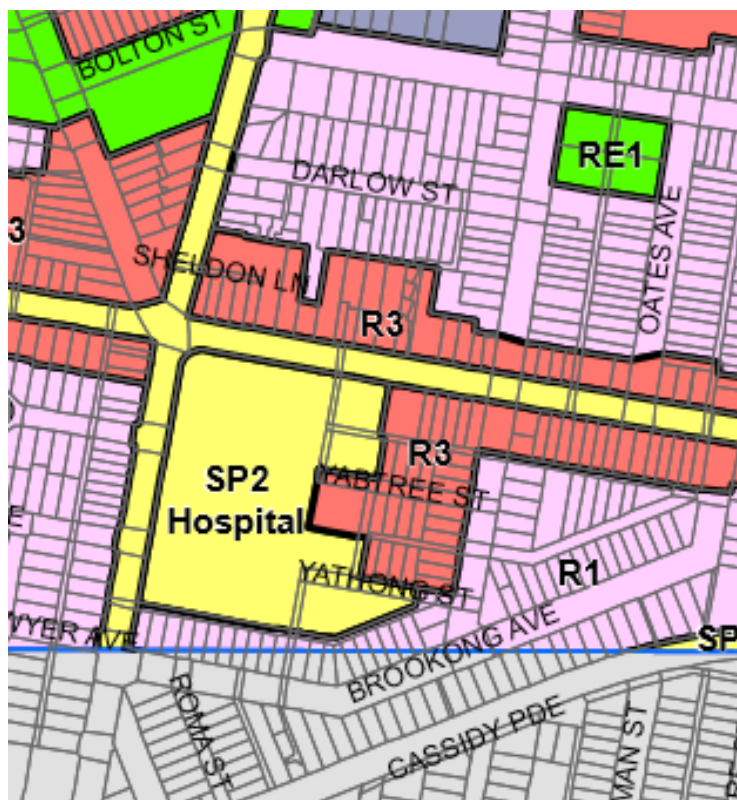


Figure 8: The WWRRH site zoned SP2 – Hospital

Source: *Wagga Wagga LEP 2010 – Land Zoning Map 003C*

Hospitals are permissible with development consent on the land under WWLEP 2010.

Clause 57(1) of the *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) allows a health services facility (which includes hospitals) to be permissible in any of the prescribed zones listed in the ISEPP. SP2 is a Prescribed Zone in the ISEPP and therefore the proposal is permissible with consent.

Zone Objectives

The objectives of the SP2 zone under the WWLEP are:

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

The proposed hospital redevelopment is capable of demonstrating consistency with these objectives.

Height and FSR

There are no maximum Floor Space Ratio or building height controls applying to the site under the WWLEP 2010.

Archaeology and Heritage

The site is identified as containing a heritage item (I261) under WWLEP2010. The Hospital is also in the vicinity of the Wagga Wagga Conservation Area, which is located to the south of WWRH. Refer to Figure 9. A Heritage Impact Statement will accompany the EIS, and will take into consideration any potential impacts on the site's significance and the adjacent Conservation Area.

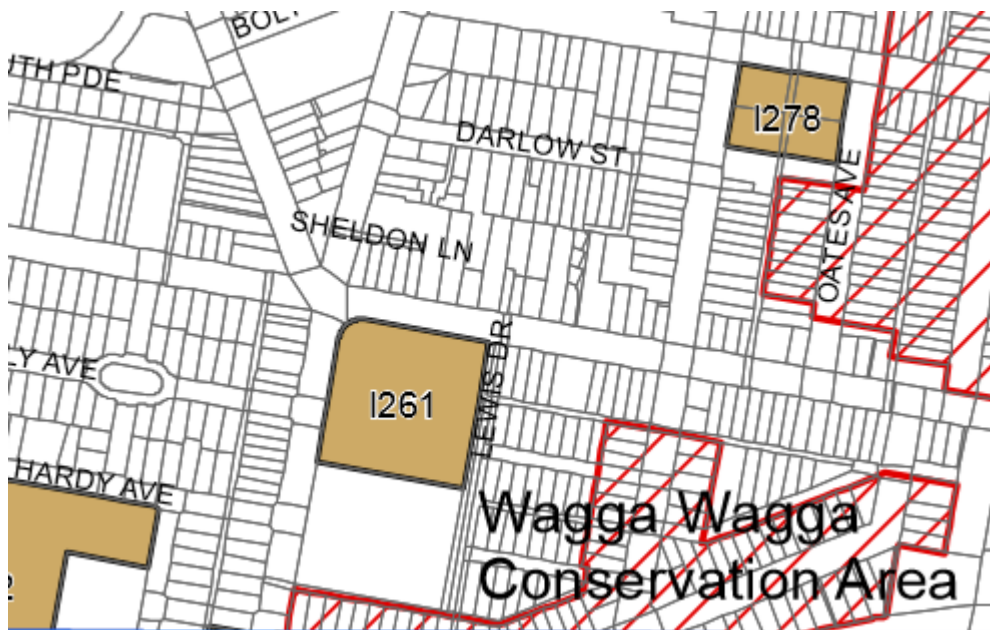


Figure 9: Local Heritage Item I261 is located on the WWRH site

Source: Wagga Wagga LEP 2010 Heritage Map 003C

Terrestrial Biodiversity

A portion of the site is identified on the Terrestrial Biodiversity Map under the WWLEP 2010 (refer to Figure 10). Previous flora and fauna assessments have been prepared for the redevelopment of the site, including SSD 5237-2012 for the approved Phase 2/3 development of the WWRH. The EIS for SSD 5237-2012 included:

The continuous development and operation of hospital facilities on site since the 1900s has provided little opportunity for fauna to establish any significant habitat within this area. The site is predominantly occupied buildings and carpark areas and any potential habitat is limited to scattered trees and grasses, neither of which support threatened species, populations and endangered ecological communities.

The approved Flora and Fauna Assessment prepared by Kevin Mills & Associates (June 2011) for SSD 5237-2012 concluded that:

This study and report has identified, described and assessed the flora and fauna on the site of Wagga Wagga Base Hospital where it is proposed to undertake a major redevelopment of the hospital. The

hospital is located on completely cleared and highly modified land in an urban setting. The site does not provide any important habitat for native plants and animals, including threatened species.

In our opinion, the redevelopment of the hospital is not likely to have a significant effect on any threatened species, populations or communities listed under the Threatened Species Conservation Act 1995, or on matters of national environmental significance. Hence the preparation of a Species Impact Statement (SIS) is not warranted and nor is referral to the Commonwealth Minister for the Environment for assessment and approval.



Figure 10: The green triangle is the identified area of terrestrial biodiversity under the WWLEP 2010

Source: NSW Planning Portal

Flooding

The WWRRH is located within groundwater affected area on the Water Resources Map and the Natural Resources Sensitivity Map - Water under the WWLEP 2010. The site is also subject to flooding from the Murrumbidgee River.

Preliminary Impact Identification and Risk Assessment

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

Traffic and Parking

Traffic generation and impacts in and around the site. Traffic analysis will be undertaken to determine the appropriate access arrangements for the site, in addition to analysis of parking demand and provision.

Noise and Vibration

An analysis of the construction and operation noise will require careful consideration of impacts upon the amenity of residential uses nearby. An acoustic and vibration assessment will be submitted with the future SSD Application.

Flooding

A Flood Impact Assessment has been conducted for the site which found that the site may be susceptible to flooding in the situation that the Murrumbidgee River overtops the Main City Levee which is constructed to stop the 1:100 year flood event. Assessment of the proposal in relation to flooding will form part of the SSD Application.

Biodiversity

Section 7.9 of the *Biodiversity Conservation Act 2016* requires that an EIS submitted with an SSD application be accompanied by a *biodiversity development assessment report* unless the *Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values*.

The WWRRH is an existing hospital with significant built form across the site. Previous Flora and Fauna Assessments prepared for the earlier stages of redevelopment of the WWRRH did not identify any Threatened Species on the site.

It is not expected that the proposal will have a significant adverse impact on the natural environment. To the extent required by state legislation, biodiversity impacts will nevertheless be addressed in the EIS.

Geotechnical, Contamination and Hazardous Materials

Preliminary assessment shows there is a low likelihood of contamination within the development zone. There is no evidence of salinity or groundwater contamination.

A geotechnical investigation of the site will be undertaken where the new Stage 3 building is proposed. Recommendations for the substructure of the building will be considered in the detailed design of the building and will be addressed and any validation requirements relating to ground conditions to ensure the site is suitable for the intended use.

Relevant investigations will be undertaken in accordance with SEPP 55 – Remediation of Land, Managing Land Contamination – Planning Guidelines, and SEPP 33 – Hazardous and Offensive Development. The assessment against the SEPPs will be submitted with the SSD Application.

Heritage and Visual Impact

The WWRRH (or parts of the site) is listed on the following statutory heritage registers:

- NSW Department of Health's Section 170 Register: 'Wagga Wagga Base Hospital'. This Register is established under the auspices of the NSW Heritage Act 1977.
- Wagga Wagga LEP 2010: 'Wagga Wagga Base Hospital (c.1960 Building)'.

In addition, Wagga Wagga Rural Referral Hospital is located within the vicinity of the Wagga Wagga Conservation Area as defined by the Wagga Wagga LEP 2010.

The EIS will be accompanied by a detailed Heritage Impact Statement to assess the impact of the proposal on the heritage significance of the site, and any potential impacts associated with the proposed development (including visual impacts on the Heritage Conservation Area).

Built Form

Whilst the site has no maximum building height control, the surrounding development is predominantly a low density residential environment. The proposed scheme will be the subject of a merit assessment with regard given to the siting, height and massing of the proposed development in the context of the surrounding landscape.

Infrastructure and servicing

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

Request for SEARs

The proposed development will enable the continuation of the redevelopment of the Wagga Wagga Rural Referral Hospital, and will further support and strengthen the medical services provided in Western NSW. As the proposal meets the criteria identified in Schedule 1 Clause 14 of the State and Regional Development SEPP with a CIV of approximately \$170 Million, Health Infrastructure formally request that the Department of Planning and Environment issue the Secretary's Environmental Assessment Requirements to facilitate the preparation of the Environmental Impact Statement for Stage 3 of the Wagga Wagga Rural Referral Hospital redevelopment.

If you require any additional information, please contact either Leone McEntee on 0410 432 505 or Rachel Mitchell on 0438 220 252. We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely



Sam Sangster
Chief Executive

Attachment 1 - Concept layout and perspectives