

Your Ref: SSD-56989722

4 October 2023

Department of Planning and Environment  
Social and Infrastructure Assessments  
Locked Bag 5022  
Parramatta NSW 2124

Dear Sir/Madam

**Public Exhibition – SSD-56989722 – Eurobodalla Regional Hospital – Princes Highway, Moruya**

Thank you for the public exhibition of the Environmental Impact Statement for the new Eurobodalla Regional Hospital.

Eurobodalla Shire Council welcomes this opportunity and is supportive of the project to provide better health facilities to the Eurobodalla Shire community.

Eurobodalla Shire Council provides the following comments for your consideration and would be available to meet with the Department and Health Infrastructure to discuss these matters.

- **Construction Workforce housing.** Social impact Assessment (Appendix CC) and temporary workers accommodation. Council has already discussed this issue with Health Infrastructure, and it is their opinion that this is a contractual matter between Health Infrastructure and the construction contractor. The Social impact Assessment indicates that a construction workforce accommodation plan would largely resolve the matter.  
It is Council's view that the housing of the construction workforce (estimated to be 306 persons) is a significant social impact and should be assessed as part of the EIS. Health Infrastructure should provide purpose-built workers accommodation onsite or near the site and Moruya. This would ensure that workers were close to the construction and reduce transport impacts in addition to providing access to the town centre.
- **Operational Workforce housing.** To some extent this also applies to the operational workforce (estimated to be 518 persons) and whilst it is noted that many staff would presumably come from the existing Batemans Bay and Moruya Hospitals, there does not appear to have been any analysis of the predicted impact.
- **Family/carer Accommodation.** The Social Impact Assessment (Appendix CC) has not adequately considered the provision of family or carer accommodation for the families/carers of patients accessing the hospital.

- **Childcare facilities.** The Social Impact Assessment (Appendix CC) has not adequately considered the provision of childcare facilities for operational staff.
- **Impact on the most disadvantaged people in Eurobodalla.** Department of Communities and Justice (DCJ) rental data for March quarter 2023 indicates a serious lack of housing diversity across the LGA, as well as the very low supply of private rental more generally, both of which are contributing to upward pressure on rents. In terms of affordability, median rents for indicative housing products that were available in the local private rental market were not affordable to any very low or low income households (52% of Eurobodalla’s population), noting that this is likely one of the most constrained regional housing markets in NSW in terms of availability and affordability of private rental. Median rents across the LGA are generally only affordable to the upper 50% or less of moderate income households; and median rent on strata dwellings in Moruya and surrounds only affordable to the upper 20% of low income renters. Should the project not provide for workforce and/or operational staff housing requirements, it is likely to further contribute to this problem.
- **Access to public transport.** The development should provide for public transport to access the hospital grounds and provide for shared pathways into Moruya township so that patients and staff are not reliant on private vehicles. The EIS notes that a bus stop would be provided on site although formal arrangements have not been made with local service providers. It is imperative that public transport is provided to the hospital.
- **Active Transport facilities.** A shared pathway should be provided from the development site into town. This could be via an upgrade of the existing footpath in Caswell Street and extension of the existing shared pathway from the adjacent TAFE NSW site, i.e. along the Princes Highway. It is considered that both paths of travel should be upgraded/extended but as a minimum at least one shared pathway (min. 2.5m width) is provided from the hospital to the town centre. Note, the Transport assessment at Appendix H would appear to nominate a 2m wide shared pathway. Council’s standards require a 2.5m wide shared pathway.
- **Helipad location.** The location of the proposed helipad is adjacent existing residential dwellings. It is not considered that the location has been sufficiently justified and that the impacts on those dwellings have been adequately mitigated. It is highlighted that the proposed helipad is approximately 5 metres from the property boundary whilst the main hospital building is 80 metres from the boundary. Appendix B – Mitigation measures outlines as a mitigation measure “community consultation once operational”. Appendix T “Noise and Vibration Impact Assessment” outlines in Section 7 – Summary of Mitigation Measures that “noise barriers are being considered as a mitigation option based on ongoing community consultation with the most affected receivers”. It is Council’s view that the mitigation measures include acoustic upgrading of existing homes with glazing/insulation or an ‘acquisition upon request’ condition is included in any approval requiring Health Infrastructure to purchase the property if noise impacts become a problem. It is not considered that a noise barrier will appropriately mitigate the noise impact nor is it considered feasible to resolve the matter at the operational phase.

- **APZ and Vegetation removal.** The bushfire assessment at Appendix BB does not illustrate the proposed asset protection zone (APZ). It is noted that the document does detail a 40-45m APZ in all directions. It would be useful to see how the prescribed APZ interacts with watercourses and the tree removal plan, i.e. Figure 5 of the BDAR, Appendix L.
- **APZ and Vegetation removal.** Figure 15 and 16 of the BDAR, Appendix L do not illustrate the asset protection zone (APZ) as part of the site works, or it is not clear as to whether the APZ has been included in the site work impacts.
- **Offsite ecological impacts** associated with the development. It is noted that the tree removal on adjacent properties as part of the helicopter flight path have been considered with the BDAR. It is also noted that the access and roundabout have been separately considered as a Part 5 activity and do not appear to have been considered as part of the BDAR process.  
The REF indicates that the loss of vegetation will be offset but it is not clear where and how this is occurring. From a transparency point of view, the loss of vegetation should be considered as part of the BDAR.
- **Biodiversity Credit Obligation.** The EIS and the BDAR provide for different credit obligations. The EIS (s 6.17) states Ecosystem credits - PCT 834 (woodland) x 57 and Species credits x 297 (total) while the BDAR states Ecosystem credits - PCT 834 (woodland) x 45 and Species credits x 252 (total).

Thank you for the opportunity to provide Council's opinion on the exhibition of the new regional hospital.

Should you require further information, please contact me phone 4474 1000 or via email [gary.bruce@esc.nsw.gov.au](mailto:gary.bruce@esc.nsw.gov.au).

Yours sincerely



Gary Bruce  
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