



1 April 2018

Mr David Gibson  
Social Infrastructure Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

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Dear Mr Gibson

**WYONG HOSPITAL EXPANSION, 664 PACIFIC HIGHWAY, HAMLYN TERRACE -SSD 9536**

Thank you for the opportunity to review and provide comment on the Environmental Assessment for the Wyong Hospital Expansion. Council has reviewed the information in the Environmental Impact Statement in response to your request and provides the following comments for your consideration.

**Transport/Traffic Engineering**

1. At the meeting held on 31 October 2018, representatives from Health Infrastructure and the consultants carrying out the preparation of the EIS agreed that Council would be supplied with the electronic Sidra files for the modelling of the Pacific Highway / Craigie Avenue intersection, however to date this has not occurred. The electronic Sidra files are required for Council to assess the impacts of the proposal.
2. There appears to be no record of the Sidra results being referred to RMS for comment.
3. The proposal to install boom gates and establish a paid parking scheme will have a significant impact on the adjoining road network. Patrons of the hospital will dominate the on-street parking in the vicinity to avoid paying for parking. This area is particularly sensitive given the close proximity of Kanwal Public School and the new private hospital. Problems are already occurring at Gosford Hospital due to paid parking as highlighted in the newspaper clipping below.



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4. There are currently a significant number of vehicles accessing the hospital parked on Pacific Highway and Craigie Avenue. This issue will be further exacerbated by the introduction of a paid parking scheme.

### **Engineering**

5. The EIS is unclear as to whether the access from Louisiana Road into the subject site is for emergency vehicles or the intent is for this access to be upgraded to cater for general public access. Table 10 refers to "suitable measures will be installed...to prevent public access" however further discussion with Health Infrastructure have indicated that public access from Louisiana Road into the subject site is still an option they are considering.

Any access from Louisiana Road into the subject site should remain restricted to emergency vehicles only. No public access shall be permitted from Louisiana Road. If the Department seeks to recommend approval of this access for use by the public then appropriate conditions regarding appropriate upgrade works on Louisiana Road and the intersection of Louisiana Road and the Pacific Highway (to cater for both capacity and safety) should be imposed.

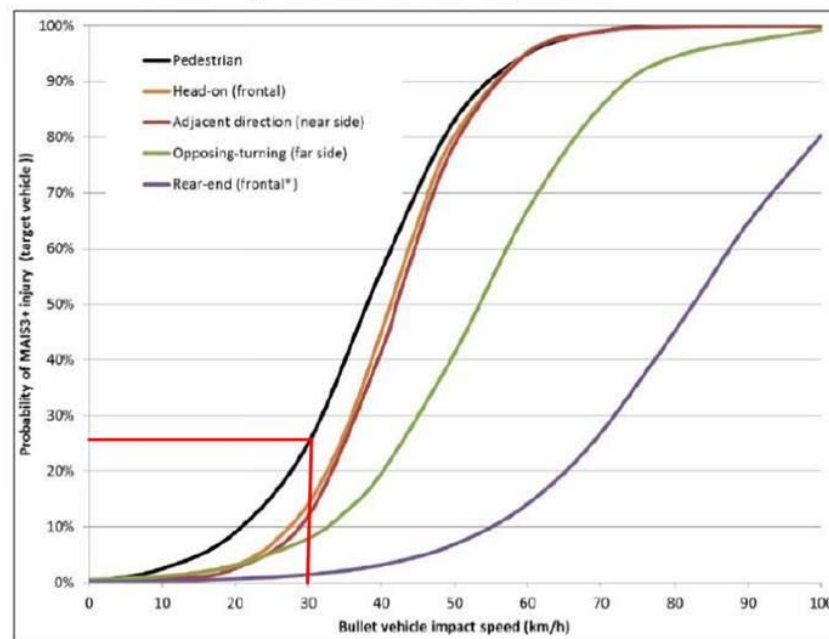
Additionally, appropriate 'way finding signage' is to include restricted access signage on Louisiana Rd, rather than providing signage where there is no provision for vehicles to turn and exit when they have incorrectly accessed the site.

### Road safety

6. With the increased car parking, upgraded Emergency Department, increased ambulance accesses, delivery and loading provisions etc. a review of the safety of road and road related areas of the complex, not only external to the development and not only during the construction phase, but for the long term operation of the facility is warranted.
7. The site is a mix of traffic environments & road users, consisting of visitors, staff, delivers, emergency vehicles, pedestrians etc. Although it is recognised that fundamentally the site will hopefully be a low speed environment, you do not need a high-speed environment to cause serious injury. The figure below, contained in a number of Austroads guides, is based on actual crash occurrences and demonstrates that a vehicle /pedestrian conflict at 30km/h has a greater probability of 1 in 4 of resulting in a serious injury or fatality.



Figure 4.9: Relationships between bullet vehicle impact speed and probability of a MAIS 3+ injury to a target vehicle occupant for different crash configurations



Source: Jurewicz, Sobhani et al. (2015)

8. It is noted within the Transport and Accessibility Impact Assessment there is a number of references to road safety and CPTED however this assessment does not address the ongoing and long term operation of the Hospital.
9. It is noted that a number of documents referenced in the Transport and Accessibility Impact Assessment, such as The RMS (RTA) Guide to Traffic Generating Developments and the Austroads Guide to Traffic Management-Part 12 Traffic Impacts of Development contain significant sections and references to road safety, road safety auditing, independent road safety assessment, internal roads and circulation, conflicting traffic activity, pedestrian safety and amenity and the like. Additionally, Council's Civil Design Guide specifically references "Hospitals" as requiring a road safety audit. However, the Transport and Accessibility Impact Assessment has not comprehensively considered the requirements of these documents and carried out the appropriate analysis.
10. Many of the referenced policies and guidelines are nominated in isolation; however need to be considered in respect of many other guidelines. If considered in isolation

there is the likelihood that certain requirements can be taken out of context. The Central Coast Transport Plan is not nominated within the References or Policies, although this document references Wyong Hospital numerous times for varying purposes.

11. The Austroads Guide to Traffic Management-Part 12 Traffic Impacts of Development states that a road safety assessment should be undertaken as part of the Traffic Impact Assessment (TIA) and an independent road safety audit should be undertaken for a development (including all internal works) for a development of this scale and type.

Moreover, both Austroads Road Safety Audit Guides recommend that land uses that generate parking facilities greater than 50 spaces should have road safety audits undertaken. In this regard, road safety audits should be undertaken for this development due to the number of car park spaces and the conflicting and different road users within the site.

In consideration of the above, it would be remiss of NSW Health & Health Infrastructure NSW not to use appropriate industry tools (road safety audits - pre and post construction etc.) to assess the safety performance of the Hospital Expansion (including all internal works) and ensure or risks are managed appropriately.

## **Ecology**

Travers Bushfire & Ecology (Travers) Report states that the proposal would result in impacts to two plant community types (PCT's):

- Removal/modification of 0.686 ha of Scribbly Gum – Red Bloodwood – Angophora inopina heathy woodland on lowlands of the Central Coast (PCT1636)
- Removal/modification of 0.106 ha of Swamp Oak – Prickly – Tall Sedge swamp forest on coastal lowlands of the Central Coast and Lower North Coast (PCT 1728)

Swamp Oak – Prickly – Tall Sedge swamp forest on coastal lowlands of the Central Coast and Lower North Coast (PCT 1728) is commensurate to Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions listed as Endangered under the NSW *Biodiversity Conservation Act 2016* (BC Act) and the Federal *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Four threatened fauna species Eastern Freetail-bat (*Mormopterus norfolkensis*), Greater Broad-nosed Bat (*Scoteanax rueppellii*), Eastern Bentwing-bat (*Miniopterus orianae oceanensis*), Little Bentwing-bat (*Miniopterus australis*), and one threatened flora species Camfield's Stringybark (*Eucalyptus camfieldii*) were found.

Credit calculations were performed by Travers in accordance with the Biodiversity Assessment Method (BAM) using the credit calculator. Travers have identified that credits required to be secured and retired to offset the impacts of the proposal include:

- 11 ecosystem credits for impacts on Scribbly Gum – Red Bloodwood – Angophora inopina heathy woodland on lowlands of the Central Coast (PCT 1636)
- One ecosystem credit for impact on Swamp Oak – Prickly – Tall Sedge swamp forest on coastal lowlands of the Central Coast and Lower North Coast (PCT 1728)
- 13 species credits for impacts to Camfield's Stringybark (*Eucalyptus camfieldii*)
- 20 species credits for impacts to Little Bentwing-bat
- 14 species credits for impacts to Southern Myotis
- 14 species credits for impacts to Pale-headed Snake

*Concerns raised in relation to Ecology report:*

- The BDAR has not been certified as BAM compliant having regard for the specified timeframes contained in Section 6.15 of the BC Act.
- PCT selection and justification is not adequate and does not comply with Section 5.2.1.12 of the BAM. There was no list provided of likely PCT's on the site and no logical steps provided in how the final PCT was selected. The applicant should provide a list of potential PCT's based on the Bionet vegetation classification system and provide logical steps and justifications (based on reference to the site data and diagnostic species for each PCT) as to how the final PCT was selected i.e. what other PCT's were considered and why were they discounted or rejected.
- Council is unable to verify if the patch size for each vegetation type has been determined and entered correctly into the calculator as this information is missing from the vegetation integrity assessment (refer to Section 5.3.2 of the BAM).

- The summarised table of plot data used to determine the current vegetation integrity scores for each vegetation zone is missing (refer to Section 5.4.1.2 of the BAM).
- Inadequate justification has been provided for the exclusion of any predicted species and credit species generated by the BAM calculator (refer to Section 6 and Appendix 10 of the BAM).
- Targeted threatened flora species surveys were not conducted in accordance with OEH guidelines.
- Threatened nocturnal bird surveys were conducted over a single night only and do not comply with OEH guidelines.
- Threatened amphibian surveys were not conducted in accordance with OEH guidelines.
- For remaining candidate species that require further assessment the applicant should either complete targeted surveys in accordance with OEH guidelines, provide an expert report to confirm species absence, or assume presence and offset under the requirements of the BAM.
- Serious and Irreversible Impacts have been correctly identified and assessed and additional information has been provided to support the decision maker.
- Council's preference is to have offsets secured within the Central Coast Local Government Area rather than offset 'somewhere' in NSW.

### Tree Removal

Concern is raised that the proposed tree removal, being a total of 287 trees, is excessive. Moreover, it was understood that the REF issued in late 2017 related to vegetation removal and site preparation to create the building pad on which the proposed development is to be located. Consideration should be given to a reduction in the number of trees to be removed.

Consideration has not been given to the provisions of Chapter 3.6-Preservation of Trees or vegetation

### Contamination

Council has previously raised concerns with Health Infrastructure NSW (letter dated 3 May 2018) regarding the encapsulation of Asbestos Contaminated Material (ACM) on the subject site.

**Page 7**

**Mr David Gibson**

**Dept of Planning & Environment**

**Wyong Hospital Expansion– SSD 9536**

The onsite disposal of hazardous waste is not in keeping with the intent of SEPP 55. The handling, placement and management of hazardous substance increase the “risk of harm to human health or any other aspect of the environment”. The encapsulation of ACM on site is not considered a Category 2 Remediation work as it is creating an inherent risk, where the applicant is opting not to appropriately dispose of the ACM at a licensed waste management facility. It is our understanding the EPA formed the same view.

The onsite disposal of ACM is not considered to be ancillary to any proposed expansion of the hospital, but is considered to be more properly characterised as a “Waste Management Facility” and thus may fall into designated development criteria outlined in Part 1 of Schedule 3 of the *Environmental Planning and Assessment Regulation 2000*. A waste management facility is a separate and independent use that requires consideration of designated development provisions and consideration of the relevant legislation associated with this type of facility.

Accordingly, Council strongly objects to any further encapsulation of ACM on site. Any ACM found during construction works should be disposed of off-site at a licensed waste management facility.

**REF Approval**

It is still unclear what works were approved and carried out in accordance with the REF approval issued in late 2017. It was understood that the scope of the REF involved the preparation of a building pad for the proposed new hospital site. In this regard, the extent of tree removal is considered excessive.

**Other Matters for consideration**

- Section 7.11 Contributions are applicable and should be levied accordingly (refer to attached schedule).
- Another Section 305 application under the *Water Management Act 2000* is to be lodged with Central Coast Council, if any internal plumbing works are proposed or connection is required to the Central Coast water supply for water usage associated with the ongoing operation of the development in the event that the nominated water supply sources are unable to cater for the ongoing maintenance of the development.



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**Page 8**  
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Please note the previous 305 Application did not cover the full scope of works which are now proposed under this State Significant development application.

If you have any further enquiries relating to this matter, please contact me on (02) 4350 5436.

Yours faithfully

A handwritten signature in black ink, appearing to read "Emily Goodworth".

Emily Goodworth  
**Section Manager, Development Assessment**  
**DEVELOPMENT ASSESSMENT**

Ekg/Emily Goodworth  
F2017/02016  
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# Empty \$30m carpark

**Richard Noone**

THE new multistorey carpark at Gosford Hospital may have opened last week but as this picture shows many staff are voting with their tyres.

Taken on Friday, it shows row after row empty as staff and visitors avoid price

rises. The unofficial boycott comes after the Health Services Union organised a rally outside the hospital to protest parking fee hikes.

The *Express Advocate* revealed the price hikes late last year which slug visitors \$6.70 for one hour and increase up to \$19.90 for a full day.

The HSU said staff would face an annual parking bill of \$1230 — an increase of \$512 a year. The increase is designed to cover the cost of the carpark build. Nurses told the *Express Advocate* they were boycotting the \$35.5 million carpark, which continues to see parking choking local streets.



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