

Regulatory, Planning and Assessment.MBisson/GMansfield  
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Phone: 02 4974 2000

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Megan Fu  
Principal Planner  
Social and Infrastructure Assessments  
Department of Planning, Industry and Environment  
GPO Box 39  
**SYDNEY NSW 2001**

Reply by email: <https://www.planningportal.nsw.gov.au/major-projects>

Dear Ms Fu

**38 LOOKOUT ROAD, NEW LAMBTON HEIGHTS - JOHN HUNTER HEALTH AND INNOVATION PRECINCT (SSD-9351535)**

I refer to the Department's electronic notification of 17 June 2021 advising a state significant development application (SSD-9351535) has been submitted for the construction of a new Acute Services Building and refurbishment works to existing hospital facilities on the John Hunter Health Campus and requesting City of Newcastle ('CN') to provide advice.

The exhibited Environmental Impact Statement and plans have been reviewed and the following advice is provided for your consideration:

**1. Aboriginal Cultural heritage**

A search of the Aboriginal Heritage Information Management System found four known Aboriginal sites within a 200m radius. In addition, much of the proposed works are located within undisturbed areas. An Aboriginal Cultural Heritage Assessment Report (ACHAR) was undertaken and assessed the site as having low archaeological potential. The ACHAR provided includes a number of management recommendations which are recommended for inclusion as conditions of consent, should the development be approved.

**2. Flood Management**

It is noted that there are natural water courses along the northern part of the site which contributes towards the stormwater that flows through the site to the lower lying catchment areas. The site generally sits at the top of the catchment area and therefore contributes to the lower catchment flooding, including Jesmond Town Centre and Wallsend Town Centre. The downstream catchment area is generally very sensitive in nature and therefore upstream contributions are required to be considered.

Concern is raised that the proposal has not considered the potential flood impact to the lower catchment areas from the overall development planning. It is recommended that a site-specific flood impact analysis and any required flood modelling be undertaken for the site to analyse the potential flood impacts from the overall site and current proposed development. Flood mitigation measures are to be considered as part of the proposal to mitigate the downstream flood impacts.

### 3. Stormwater Management

The submitted concept stormwater plans, MUSIC Modelling and cut and fill plans have been reviewed. The plans and the MUSIC modelling are generally in accordance with the guidelines of the Newcastle Development Control Plan (NDCP) 2012, except for the assessment and design against hydrological targets within the NDCP as discussed below.

As noted in the flood management comments above, the proposal is to consider the potential impacts from flooding and mitigating measures to manage the run-off on this upper catchment area to ensure that the lower catchment areas are not impacted. The proposal will be discharging through natural creek areas and will need to demonstrate elements relating to the management of stormwater discharge control for more frequent stormwater events. The concurrence of WaterNSW may also be required.

To be consistent with the NSW Government's 'Risk-based Framework for Considering Waterway Health Outcomes', hydrological targets need to be met by this proposal for frequent, stream forming flows. An example is the Stream Erosion Index for 2yr ARI events, set within CN DCP.

The State's risk-based framework for waterway health prompts consideration of the following context for the protection of downstream natural creek lines in natural bushland reserves.

- The current zoning of the riparian corridors downstream reflects their local ecological significance and rarity within the Local Government Area.
- The extent and location of these downstream riparian bushland reserves constitutes a key corridor within the cities' local green and blue grid, consistent with the NSW Government's Greater Metropolitan Plan.
- The potential impacts and likely trajectory of these downstream natural creek lines. Changes to the flow and duration of frequent flows (in the vicinity of 2yr ARI events) cause downstream natural creek lines to deepen. This destabilises both channel beds and banks. This can result in risks to infrastructure and private land. It increases the sediment released from the whole length of the creek line. This can reduce downstream channel, pipe, and drain capacity.
- The impacts of the proposed cut and fill batters and culverts to install new internal road networks. These disconnect upper bushland headwater catchments from downstream streams.
- The community's environmental values and uses of the waterway, as a local bushland reserve. Confirmed through local Community Strategic Plans.

To mitigate this risk, it is recommended hydrologic objectives are achieved for the hospital development so that the Stream Erosion Index (SEI) is to be no greater than 2, where the SEI is expressed as the ratio of '*post development flow exceeding the stream forming flow*' to '*pre-development flow exceeding the stream forming flow*'. The drainage calculation method for checking and achieving this SEI objective are outlined in the Stormwater and Water Efficiency Technical Manual – Section 4.15 of the NLEP 2012. This target is derived from best practice hydrology – the CRC for Catchment and Creek Hydrology. It may be achieved through careful detailed design of inlets and outlets of proposed biobasins.

It is further recommended that the designs are amended to ensure culverts and pipes which discharge into downstream bushland include rock stabilised energy dissipator outlets, which apply natural channel design principles. The site specific, expert design and construction of these will protect upstream infrastructure from bed erosion risks. Unchecked, bed erosion can migrate upstream. Given the downstream contours (C100-DA-5) CN suggests rockwork is needed for respectively 20 and 40/50 metres to locations where the receiving waterway's longitudinal grade reduces.

#### **4. Traffic management**

A new road link is proposed into the site via the proposed Newcastle Inner City Bypass and new Eastern and Western Road links within the site. The proposed new Services Building Carpark will be linked via a new driveway to the Eastern Link.

Overall, the submitted traffic report has indicated that the future proposed links to the site via the Inner By-pass will enhance traffic movement to and from the site, while also reducing the traffic impacts on the existing Lookout Road network.

The proposed development is dependent on the proposed Bypass to be constructed to manage the internal access roads network. The data presented in the traffic report seems to indicate that some of the existing intersections are at near capacity and service levels are below expectation. In this regard, the following concerns are raised:

- Consideration should be given to upgrading the existing and proposed traffic intersections to ensure that the internal road network can achieve a satisfactory level of service with or without the Bypass access. This will ensure that the internal access management can be sustained in case the Bypass is not constructed prior to the building or even during maintenance of the road network.
- Safety and compliance with Australian Standards to the internal road network intersections.

Furthermore, the vehicle Swept path plan prepared by GTA indicates that the northern section of Kookaburra Circuit between the proposed building and Jacaranda Drive allows for trucks to pass through the existing building underpass, thus appears to propose a two-way travel where it is currently one-way. This will likely result in additional works required within the road and the existing building, which has not been identified on plans. Height clearance at the underpass location would need to be confirmed.

#### **5. Parking management**

The submitted traffic report and survey seems to indicate the provision of additional parking spaces for the proposed development and for staff, however clear numbers for staff parking have not been indicated in the report.

Concern is raised that the proposed modification of the existing staff car parking and not allocating additional parking for staff for the overall development and hospital precinct has not been demonstrated. Furthermore, the impact of parking during construction stage and management has also not been addressed.

## 6. Alternative transport

Although the submitted Green Travel Plan will promote *'the use of transport, other than the private car, for choice of travel to and from the JHHIP site, which is more sustainable and environmentally friendly'*, only 24 secured staff bike storage spaces are provided with minimum end user facilities proposed. It is noted that there will be additional cycle network created through the Bypass proposal and the development.

CN is concerned that a lack of end user facilities and secured bike storage will discourage use of bicycle usage and encourage greater car travel, thus further burden on off-street and on-street car parking demand.

## 7. Local Bushland Impacts

It is recommended habitat tree protection measures are included in the design and construction controls applied to the site, particularly given the vulnerability of the local squirrel glider population in this area. It is recommended high density native vegetation beds are planted on disturbed surfaces to reduce the risk for future weed impacts.

## 8. Section 7.12 Local Infrastructure Contribution

CN's Section 7.12 Local Infrastructure Contribution Plan 2019 (Update Dec2020) applies to the subject land. However, as stated in the EIS the plan provides that s7.12 levy is not imposed on an *Infrastructure Infacility* as defined under the State Environmental Planning Policy (Infrastructure) 2007. The proposed development constitutes an infrastructure facility and therefore no levy is applicable.

If you have any questions in relation to the various matters raised in this letter, please contact Geof Mansfield, Principal Planner (Development) on 4974 2767 or by email on [gmansfield@ncc.nsw.gov.au](mailto:gmansfield@ncc.nsw.gov.au) .

Yours faithfully



**Michelle Bisson**  
**MANAGER REGULATORY, PLANNING AND ASSESSMENT**