

5 December 2018

Ms Carolyn McNally  
Secretary  
Department of Planning and Environment  
GPO Box 39  
SYDNEY  
NSW 2001

Dear Ms McNally

**Request for Secretary's Environmental Assessment Requirements  
Shellharbour Hospital Expansion - alterations and additions to the existing main hospital  
building, construction of a new Acute Services Building, construction of a new multi-storey  
car park and associated works**

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), Health Infrastructure request the issue of Secretary's Environmental Assessment Requirements (SEARs) for a State Significant Development (SSD) application for the proposed Shellharbour Hospital Expansion. The proposal involves alterations and additions to the existing hospital building, the construction of a new Acute Services Building (ASB), the construction of a new multi storey car park and associated works.

The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued for this application.

## **1 Background**

The Illawarra Shoalhaven Local Health District (ISLHD) is responsible for providing and managing all public health care within the Illawarra and Shoalhaven catchment area, and within the Shellharbour, Shoalhaven and Wollongong Local Government Areas (LGAs). The region is significant, extending approximately 250km along the coastal strip from Helensburgh in the north to North Durras in the south, servicing a population of more than 400,000 residents.

The ISLHD is one of the region's largest employers with a workforce of more than 7,300 employees across eight hospital sites and community health services.

The region is served by a number of hospitals including:

- Bulli Hospital;
- Coledale Hospital;
- David Berry Hospital;
- Kiama Hospital and Community Health Service;
- Milton-Ulladulla Hospital;
- Port Kembla Hospital;
- Shellharbour Hospital;

Health Infrastructure  
ABN 89 600 377 397

- Shoalhaven District Memorial Hospital; and
- Wollongong Hospital.

Shellharbour Hospital is a key acute care facility (Class C1) within the ISLHD which provides emergency services, elective surgical services, general medical, antenatal and primary family health care, satellite renal dialysis and adolescent and adult mental health services on site. Shellharbour Hospital is an accredited health care facility with the Australian Council on Health Care Standards (ACHS) and is recognised as providing a high standard of care to the community.

The District is forecasting a significant increase in health service demand in the region due to both a growing and ageing population, and evolving health care needs. The existing Shellharbour Hospital in its current configuration is at capacity, with several facilities which do not enable the delivery of efficient contemporary models of care.

The expansion of the Shellharbour Hospital comprises minor alterations and additions to the existing hospital building, and construction of a new Acute Services Building (ASB), to be connected to the existing hospital via a bridge link. The proposal also includes the construction of a new multi storey car park and associated works, including landscaping.

The proposal will provide a contemporary, flexible healthcare facility suited to the new model of care and future healthcare needs of the catchment population in the ISLHD.

## 2 The Site and Locality

The site is located at 15-17 Madigan Boulevard, Mount Warrigal, and includes a total of four (4) lots as described in Table 1 below. The site is located within the Shellharbour LGA. The Shellharbour Hospital campus is located across two suburbs, including the western part of the suburb of Mount Warrigal and the eastern part of the suburb of Oak Flats.

Table 1: Overview of Legal Description and Lot Ownership

Legal Description	Ownership
Lots 205 DP 2241966	Health Commission of New South Wales
Lots 206 DP 2241966	Health Commission of New South Wales
Lot 2 DP 588310	Health Commission of New South Wales
Lot 1129 DP 263029	Health Administration Corporation

The hospital occupies a large area of land adjacent to Lake Entrance Road, a State classified road to the south-east of the site. TAFE NSW Shellharbour is located to the west of the site and established low density residential development is located surrounding the site to the north, east and west. Lake Illawarra is approximately 500 metres north-west of the existing Shellharbour Hospital campus.

The Shellharbour Shopping Centre is located to the south-west of the site, approximately 850 metres by road, and Shellharbour Village is located to the south-east of the site, approximately 4.8 kilometres by road.

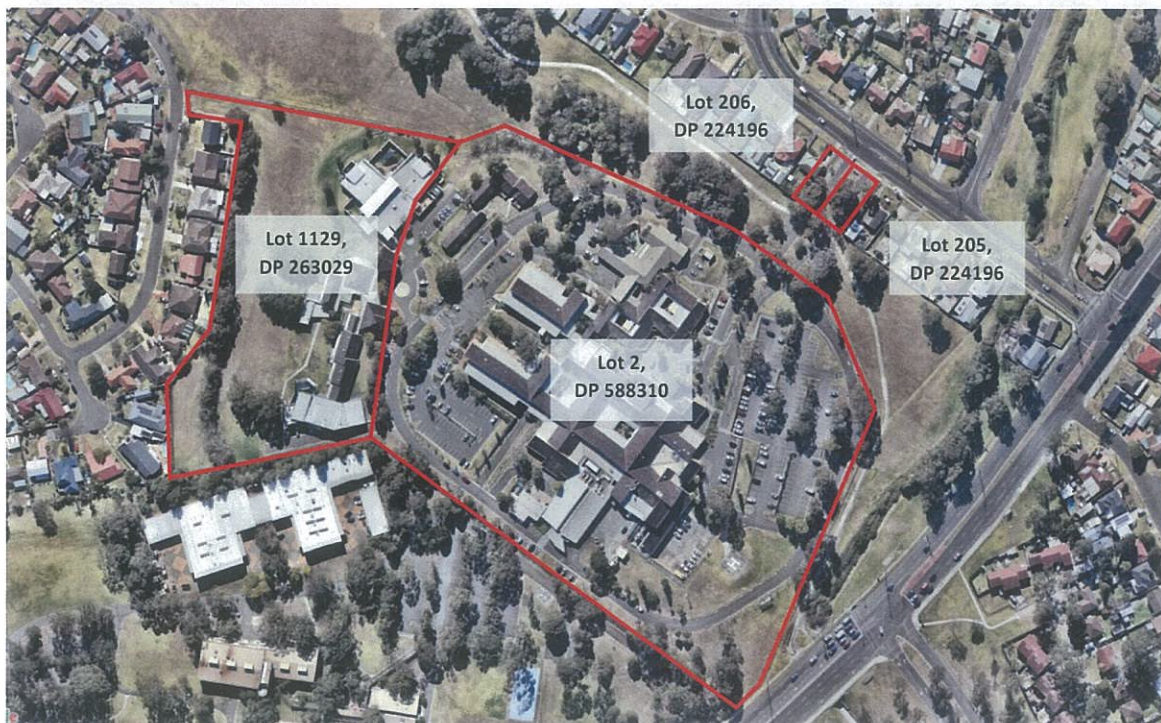
The main entrance to Shellharbour Hospital (including Emergency) is located on Madigan Boulevard, which intersects with Lake Entrance Road approximately 100m east of the site. The site is largely established with numerous hospital buildings spread across the site varying in height and scale. The site also accommodates a large at-grade car park, accessible from Madigan Boulevard, and ring road.

Refer to the context map and location plan at **Figure 1** and **Figure 2** below.





**Figure 1 Aerial view of region**  
Source: Nearmaps



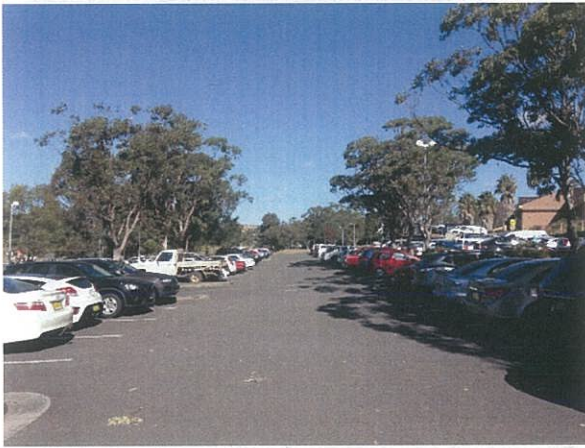
**Figure 2 Aerial View of Locality**  
Source: Nearmap



### ***Built Form Context***

The wider site currently accommodates a large central building and several ancillary buildings to the west and south of the main building for the purpose of various hospital uses, as well as roads and car parking. Most of the buildings are located on Lot 2 of DP 588310, which is largely developed.

The wider site also accommodates a number of at-grade car parks, accessible from Madigan Boulevard, with the hospital's main car parks located on the eastern side and western side of the main hospital building. The at-grade car park to the east of the main hospital building includes some changes of level following the topography down towards Lake Entrance Road.



Photograph 1 View from the hospital car park entrance, looking south towards the location of the proposed ASB.



Photograph 2 View from the hospital car park, looking south west towards the existing main public hospital entrance.



Photograph 3 View from the public hospital entrance south east, looking towards the existing helipad and location of the proposed ASB.



Photograph 4 View from the helipad, looking north across the existing hospital car park and location of the future ASB.

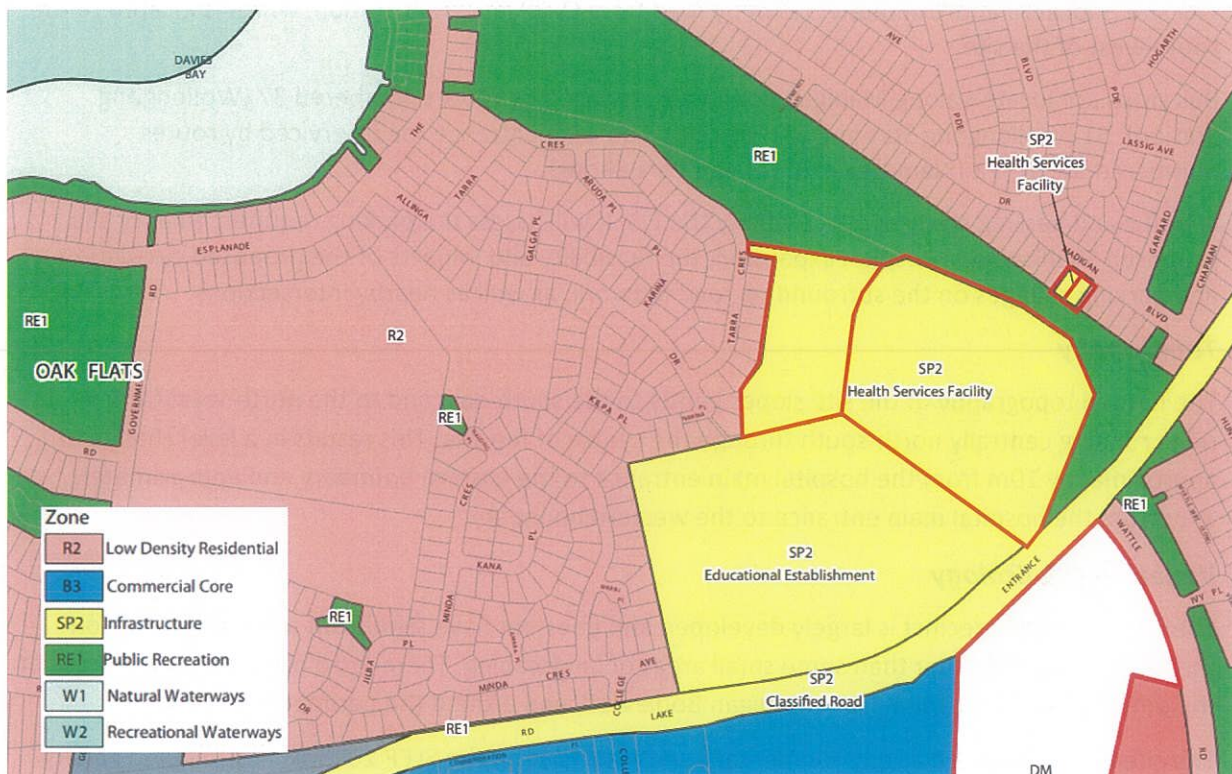


### 3 Key Planning and Environmental Issues

#### Zoning

The site is zoned SP2 Infrastructure (Health Services Facility) pursuant to the Shellharbour Local Environmental Plan (SLEP) 2013. Refer to the extract of the SLEP 2013 zoning map provided at **Figure 3** below. All works will be located within the SP2 zone pursuant to the SLEP 2013 and accordingly are permissible.

Land adjacent to the site to the north and east is zoned RE1 Public Recreation. It is noted that the current site entry and access road to the Shellharbour Hospital crosses through this land. Land adjacent to the site to the south-west is zoned SP2 Infrastructure (Educational Establishment) and is occupied by TAFE NSW Shellharbour; Lake Entrance Road to the south of the site is zoned SP2 Infrastructure (Classified Road); and, land to the west is zoned R2 Low Density Residential.



**Figure 3. Extract of SLEP 2013 Zoning Map**

Source: Shellharbour LEP 2013

#### Heritage

##### European Heritage

The site is not identified as a heritage item or located within a Conservation Area. There are no heritage items located adjacent to, or within close proximity of, Shellharbour Hospital.

##### Aboriginal Heritage

The review of heritage databases by Architectus has found that there are no Aboriginal or historic sites recorded at or within the vicinity of the proposed works.



An Aboriginal Heritage Information Management System (AHIMS) search was carried out on 25 October 2018. This found no Aboriginal sites have been recorded on or near the hospital site, and no Aboriginal places have been declared on or near the site.

Whilst the site appears not affected by European or Aboriginal Heritage based on a desktop analysis, for completeness an Aboriginal and Cultural Heritage Statement will be prepared and submitted with the future SSDA.

### ***Transport and Access***

The main entrance to Shellharbour Hospital (including Emergency) is located on Madigan Boulevard, which intersects with Lake Entrance Road approximately 100m east of the site.

All visitor car parking is located within the existing at grade car parking, on the eastern side and western side of the main hospital building. It is understood this car park currently operates at, or close to, capacity.

The site is located approximately 3.2km by road from Oak Flats Train Station, which is located to the south west of the site.

Bus stops are located along Madigan Boulevard, serviced by routes numbered 37 (Wollongong Station), 51 (Wollongong Station); and bus stops on Lake Entrance road, serviced by routes numbered 37, 51, 71 (Kiama) and 76 (Albion Park Shops).

A traffic and parking study will accompany the EIS. It will assess the parking requirements for the proposed Shellharbour Hospital Expansion, the feasibility and impacts of the proposed circulation and parking changes on the surrounding road network, as well as nearby intersections.

### ***Topography***

The natural topography of the site slopes gently to the south-east and to the north-west from a ridge running centrally north-south through the centre of the site. This results in a level change of approximately 10m from the hospital main entrance to the eastern boundary and approximately 14m from the hospital main entrance to the western boundary.

### ***Vegetation & Ecology***

The main hospital precinct is largely developed and does not have significant areas of vegetation throughout the site other than some small areas of landscaping. There are a number of large trees at the entrance to the hospital from Madigan Boulevard, and around the perimeter of the site.

The site is not identified as environmentally sensitive land on the SLEP 2013 Terrestrial Biodiversity map.

Whilst the site is not identified as environmentally sensitive land, noting the presence of large trees, an Aborigicultural Assessment will be prepared and submitted with the future SSDA.

### ***Aviation***

The site accommodates an existing helipad located to the south east of the site. This helipad is proposed to be relocated on the roof area of the proposed ASB at the site.

Aviation advice will be sought to support the SSDA to ensure there will be no interference with flight paths attributed to proposed built form which will be higher than surrounding existing buildings.

***Flooding***

The Section 10.7 Planning Certificate provides that the site is partially identified within *Elliot Lake – Little Lake Floodplain Risk Management Study & Plan (2016)* as Flood prone. The proposed SSD development works are outside of the flood planning area and the PMF. A detailed flood study will be undertaken and the SSDA will address relevant flood assessment considerations to demonstrate that it satisfies flood planning requirements for the hospital and its associated facilities.

***Contamination***

A Detailed Site Investigation has been undertaken by GHD (August 2018).

Based on the results of this investigation, minor exceedances for copper and zinc were identified on the site, however no exceedances of adopted human health criteria were recorded.

Based upon the results of this investigation the site is considered suitable for the current and planned future site use in accordance with SEPP 55.

A full Contamination Assessment will be submitted with the future SSDA, to demonstrate compliance with SEPP 55.

***Groundwater***

A Geotechnical Investigation has been undertaken by (GHD August 2018). No groundwater was encountered in the test pits or boreholes during the investigation.

***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.

***Bushfire***

The site is not identified as being located within bushfire prone land.

***Built Form and Visual Impact***

Whilst the site has no maximum building height control, the surrounding development is adjacent to predominantly a low density residential environment. The proposed scheme will be the subject of a merit assessment with regard given to the height and scale in the context of the surrounding landscape. An assessment of visual impact will be undertaken of height and scale, to accompany the SSDA.

A primary consideration in determining the proposed building form is the operational function of medical uses, including critical clinical adjacencies between departments and travel distances within the hospital.

***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. An infrastructure and services statement will be prepared and accompany the SSDA.



## 4 The Project

### 4.1 Proposed development under SSD application

This Request for SEARs seeks environmental assessment requirements for a SSD application for construction of a new ASB, minor alterations and additions to the existing hospital building, the construction of a multi storey car park and associated works.

The scope of proposed works includes:

- **Construction of a new Acute Services Building (ASB)**, with a gross floor area (GFA) of approximately 15,574sqm, providing new and expanded acute services. These services will be provided in a new building up to five (5) storeys in height (excluding rooftop plant) and will be connected to the existing hospital building through a proposed bridge link.  
A new helipad is also proposed to the roof of the new ASB.
- **Alterations and additions to the existing hospital building**, comprising internal reconfiguration to facilitate the proposed bridge link to the new ASB.
- **Construction of a multi storey car park** (up to five (5) storeys) located to the north east of the site (at the location of the current at grade car park).
- **Associated works** are likely to include, however are not limited to:
  - Excavation, earthworks, site grading and preparation;
  - Services upgrades;
  - Tree removal; and
  - Landscaping works.

Refer to **Figures 4 – 6** below for indicative architectural plans of the proposed works.



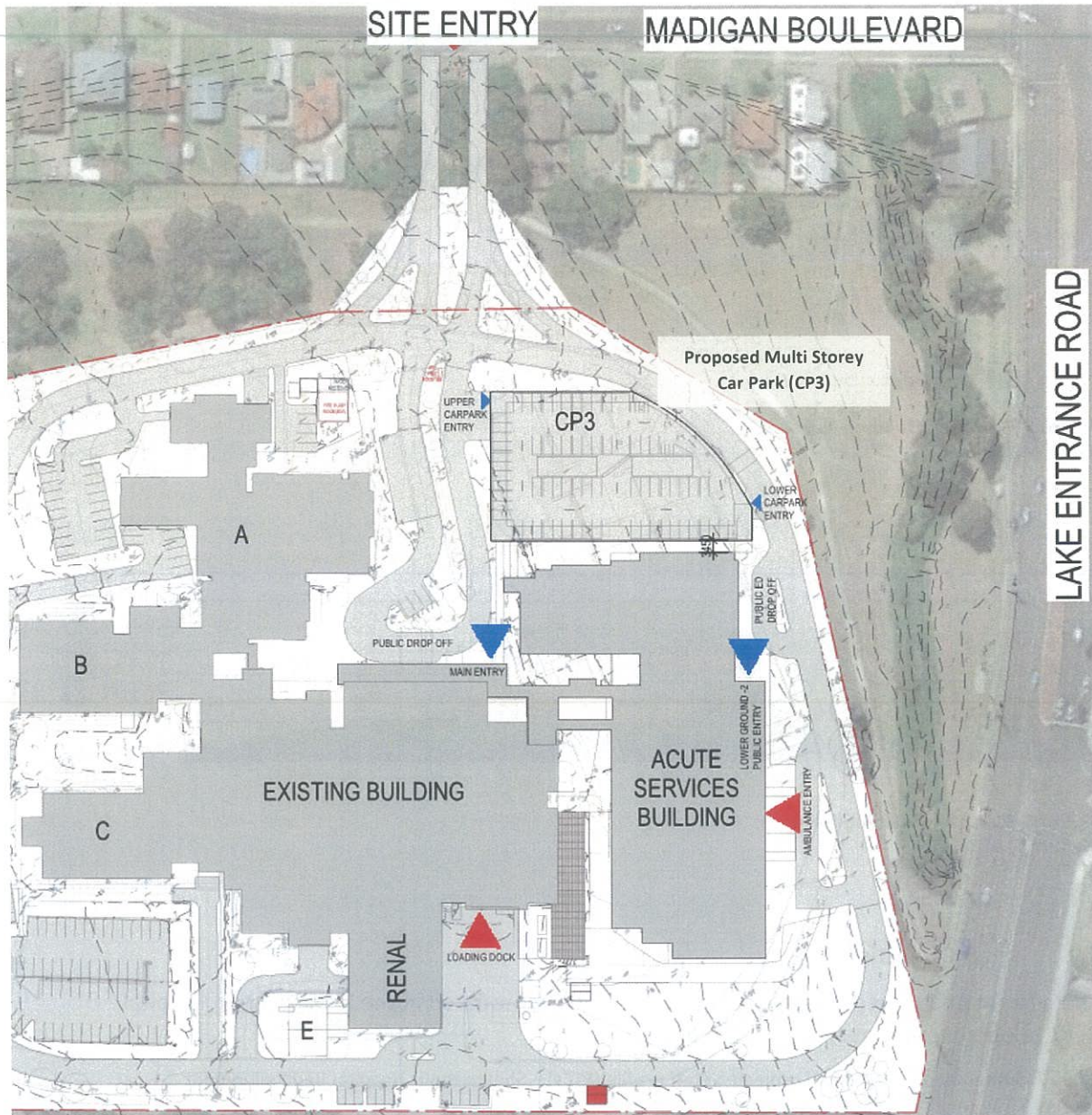
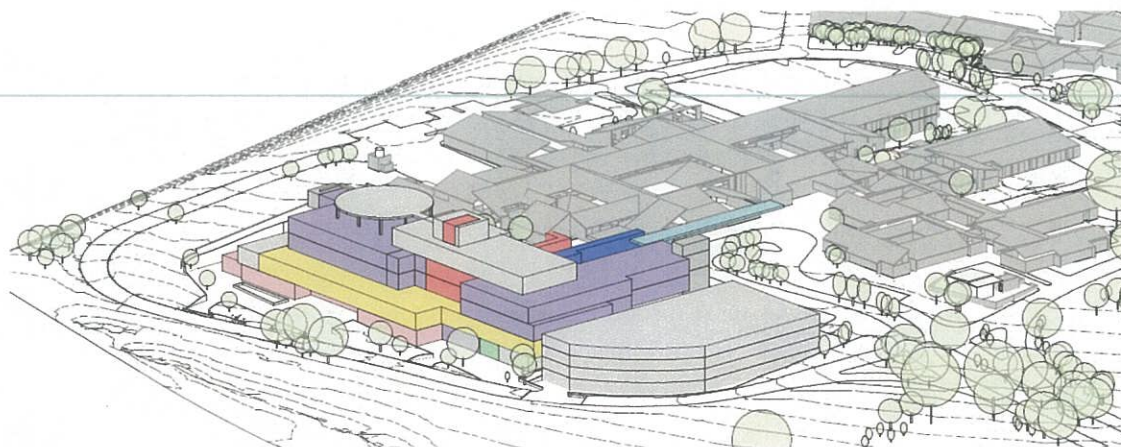


Figure 4. Proposed Site Plan  
Source: MSJ (2018)

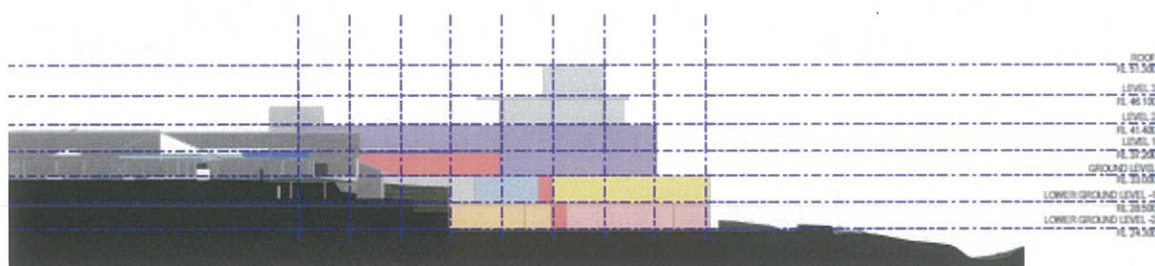




① SEARS - NORTH EAST AXONOMETRIC VIEW

**Figure 5. Proposed Building Massing**

Source: MSJ (2018)



**Figure 6. Proposed Building Section**

Source: MSJ (2018)

## 4.2 Staff Projections

The current and projected staff numbers to be accommodated in the Shellharbour Hospital Redevelopment are presented in the following table.

**Table 2. Summary of current and projected staff profile (FTEs) – Shellharbour Hospital Redevelopment**

Source: NSW Health Infrastructure

	Staff FTE
Current staff - 2018 (base case)	431.25
Additional staff	348.86
<b>Future staff post redevelopment - 2031</b>	<b>780.11</b>

Note: this include leave relief and future FTE is projected to 2031. This excludes services out of scope of the SHHR



## 5 Planning Framework

### 5.1 Strategic Planning Context

#### State Infrastructure Strategy Update

The *State Infrastructure Strategy Update*, released in 2014 by Infrastructure NSW is the revision to the initial 2012 Strategy, *'First Things First'*. It comprises recommendations to the NSW Government on the highest value and most effective infrastructure priority projects in Greater Sydney and Regional NSW.

The strategic objective for Health under the Strategy is to *"Support the health, wellbeing and economic participation of our growing population and contribute to the attractiveness of NSW as a place to live and do business"*.

Of relevance to the proposed development, the Strategy identifies that *"demand for acute services will grow by 48 per cent"* by 2031, which is *"nearly double the rate of population growth"*. As such, the Strategy states that substantial investment in health infrastructure is required over the next 20 years. The Strategy recommended a reservation of \$600m from the *Rebuilding NSW Initiative* for a Hospitals Growth Program towards funding new health facilities. Furthermore, a key direction for regional NSW is to upgrade hospitals and other social infrastructure in regional hubs.

The proposal provides outcomes consistent with the strategy by expanding the provision of health facilities and services to meet the significant growth in demand for acute services to 2031 (+48%). In doing so it supports the health, wellbeing and economic participation of the growing and ageing population in the Illawarra and Shoalhaven Region.

#### Illawarra Shoalhaven Regional Plan

The Illawarra Shoalhaven Regional Plan 2036 was released in late 2015 and is the NSW Government's 20-year plan for the region. It provides direction for the region's productivity, environmental management and liveability, and for the location of housing, employment, infrastructure and open space.

The Plan identifies that by 2036 there is a need to create an additional 35,400 new dwellings, and a broader need to support and increase employment opportunities across a variety of industries within the region, including the healthcare sector.

The Shellharbour Hospital is located within the Shellharbour Centre, a 'Major Regional Centre' and a key employment link between Metro Wollongong to the north (a 'Major Urban Centre') and the Nowra Centre to the south (a 'Major Regional Centre').

The key matters which relate to the proposed development are as follows:

#### *Goal 1 – A prosperous Illawarra–Shoalhaven*

- *Direction 1.3 – Grow regional strategic assets to support economic growth across the region; and*
- *Direction 1.3.2 - Diversify and grow local employment opportunities in the Shellharbour Centre by attracting complementary health and education activities.*

#### *Goal 3 – A region with communities that are strong, healthy and well-connected*

- *Direction 3.3 Build socially inclusive, safe and healthy communities.*

The proposal achieves these goals by providing increased job opportunities during construction and operation, supporting improved job containment in the region.



In addition, providing an augmented, contemporary and flexible healthcare facility provides for the growing needs of new communities in the region, and by expanding this important economic sector, is a significant step towards the evolution of a health precinct in the Illawarra Shoalhaven region.

## 5.2 Statutory Planning

### Legislation

#### ***Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)***

The Commonwealth EPBC Act legislates the provisions for the assessment of actions likely to have a significant impact on Matters of National Environmental Significance (MNES) listed under the Act. Refer to Ecology discussion at **Section 3** above.

#### ***Biodiversity Conservation Act 2016***

The Biodiversity Conservation Act 2016 (BC Act) identifies threatened species, populations and ecological communities in NSW and provides mechanisms for their conservation and recovery.

Section 7.9 of the BC Act requires that a Biodiversity Development Assessment Report (BDAR) accompany an SSD application. The Minister may waive the requirement for the preparation of a BDAR pursuant to Clause 7.9(2) of the BC Act, if it is determined that the proposed development is not likely to have any significant impact on biodiversity values.

#### ***Contaminated Land Management Act 1997***

The subject land is not subject to any declarations, orders, or voluntary management proposals as defined in the Contaminated Land Management Act 1997.

As noted earlier Preliminary Contamination Assessment prepared by GHD (dated August 2018), found minor exceedances for copper and zinc and were identified on the site, however no exceedances of adopted human health criteria were recorded. Based upon the results of this investigation the site is considered suitable for the current and planned future use of the site, pending a full Contamination Assessment which would accompany a future SSD.

#### ***Heritage Act 1977***

Refer to Heritage matters at **Section 3** above.

#### **State Environmental Planning Policies (SEPPs)**

The following table identifies the key SEPPs that apply to this proposal:

**Table 2. Applicable SEPPs**

SEPP No.	Name	Applies	Capable of Complying*
1	Development Standards	No	N/A
33	Hazardous and Offensive Development	Yes	Yes
55	Remediation of Land	Yes	Yes
	Infrastructure 2007	Yes	Yes
	State and Regional Development 2011	Yes	Yes
Draft	(Draft) Environment SEPP	Yes	Yes
Draft	(Draft) Remediation of Land	Yes	Yes

\*Subject to future detailed design processes



### ***Land Use Permissibility***

The site is subject to **Zone SP2 – Health services facility** under Shellharbour LEP 2013. Development for the purposes of a Hospital is permitted within Zone SP2 – Health Services Facility, under the land use table of the Shellharbour LEP 2013.

Clause 57(1) of the State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) establishes that development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone. The proposed hospital redevelopment is permitted with consent as it is within a prescribed zone (SP2 Infrastructure – Health Services Facility).

### ***LEP Development Standards & Other Provisions***

The site is not subject to a maximum height of buildings control pursuant to Clause 4.3 or any Floor Space Ratio (FSR) restriction pursuant to Clause 4.4 of the LEP 2013.

Notwithstanding, a number of provisions of the LEP 2013 do apply to the site which provide matters for consideration and must be incorporated in the assessment of any development, including, however not limited to Clause 6.1 (Acid Sulphate Soils) and Clause 6.3 (Flood planning).

### ***SRD SEPP 2011***

The total estimated Capital Investment Value (CIV) of the project is \$251 million, which is over the minimum threshold of \$30 million CIV for hospitals to be assessed as State Significant Development (SSD), as specified under Schedule 1, Clause 14 of the SRD SEPP 2011.

## **6 Anticipated Submission Requirements**

The anticipated submission requirements for the SSD application would include:

- Environmental Impact Statement (EIS);
- Site Survey;
- Architectural Plans and Architectural Design Report;
- Visual Impact;
- Quantity Surveyor's/CIV Report;
- Traffic Impact Assessment
- Geotechnical Report;
- Contamination Investigation;
- Preliminary Civil Design and Statement (including stormwater drainage, flooding, earthworks and erosion and sediment control measures);
- Structural Engineers Report;
- Landscape Plans and Report;
- Accessibility Report;
- Aboriginal Cultural Heritage Assessment Statement;
- Arboricultural Report;
- Biodiversity Development Assessment Report/Ecological Impact Assessment
- Construction and Environmental Management Plan;
- Acoustic Impact Assessment;
- Infrastructure Management Plan;
- Aeronautical Advice;
- Waste Management Plan;
- Preliminary Hazard Analysis; and
- ESD Report.



## 7 Consultation Undertaken

Significant consultation has been undertaken to date by Health Infrastructure, the Project Manager and the consultant team for the proposed redevelopment of the Shellharbour Hospital. This consultation has included (however not limited to):

- Shellharbour Hospital staff;
- NSW Ministry of Health staff;
- Shellharbour Council;
- Illawarra Shoalhaven Local Health District;
- Roads and Maritime Services;
- NSW Treasury;
- Aboriginal community and Aboriginal stakeholders;
- The local community;
- NSW Ambulance;
- Local Bus Companies; and
- HealthShare.

As part of preparing the SSDA consultation is anticipated to be required at a minimum with:

- Shellharbour Council;
- Transport for NSW;
- NSW Roads and Maritime Services;
- NSW Office of Environment and Heritage;
- Shoalhaven Water;
- NSW Environment Protection Authority;
- Office of the Government Architect NSW; and
- The local community.


## 8 Request for SEARs

On the basis that the proposal meets the criteria identified in Schedule 1 Clause 14 of the *State and Regional Development SEPP*, 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 the proposed expansion of Shellharbour Hospital. The proposal comprises alterations and additions to the existing hospital building, the construction of a new ASB, the construction of a new multi storey car park and associated works.

If you require any additional information please contact Rachel Mitchell on 0438 220 252.

We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely,



Cathryn Cox  
A/Chief Executive