

1 May 2019  
Ref No: 2876-1084

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

**Attention: Secretary of Department of Planning and Environment**

Dear Sir/Madam

**Section 4.55(1a) - Modification Application to Development Consent SSD 8981  
- Expansion of the Coffs Harbour Hospital**

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On behalf of Health Infrastructure NSW (HI), we hereby submit an application pursuant to section 4.55(1a) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to modify Development Consent SSD 8981 relating to the expansion of the existing Coffs Harbour Hospital.

This section 4.55(1a) application seeks to modify Development Consent SSD 8981 by way of deleting Condition D12, which requires the construction and operation of additional car parking within the Coffs Harbour Hospital Campus. It includes an assessment of the proposal with regards to car parking, in terms of the matters for consideration as listed under section 4.55(1a) and section 4.15 of the EP&A Act. This application is accompanied by:

- A copy of the Notice of Determination for SSD 8981 (**Attachment A**);
- Parking and Traffic Consultants (2013) report *Coffs Harbour Hospital Updated Parking Demand Study* (**Attachment B**);
- GeoLINK (2014) report *Review of Environmental Factors - Coffs Harbour Health Campus Car Park* (**Attachment C**);
- GTA Consultants (2019) letter report - *Coffs Harbour Hospital Expansion – External Parking Demand Analysis* (**Attachment D**).

## 1. Introduction

Development Consent (SSD 8981) (**Attachment A**) was granted on 28 February 2019 by the NSW Department of Planning and Environment. The project comprises the expansion of the existing Coffs Harbour Hospital including the construction of new Clinical Services Building, construction of relocated carparking spaces, associated roadworks, infrastructure and service work and refurbishment of the various existing buildings.

Condition D12 of Development Consent SSD 8981, states:

*'Prior to the commencement of the operation, the Applicant must construct and operate 319 car parking spaces in the Stage 2 of the at-grade car park approved by the Health Infrastructure on 24 September 2014 (Review of Environmental Factors Approval No: 010/2014).'*

## 2. Background

A report by Parking and Traffic Consultants (PTC 2013) (**Attachment B**) entitled *Coffs Harbour Hospital Updated Parking Demand Study* was commissioned by HI and assessed parking availability and demand in March 2013. The report concluded that there was a shortfall in parking at the time of approximately 450 spaces. A *Review of Environmental Factors - Coffs Harbour Health Campus Car Park* (Approval No: 010/2014 (GeoLINK 2014) (**Attachment C**) was subsequently undertaken to assess the construction and operation of new car parking facilities and stated that staging of the works would be subject to funding and actual project costs, but would likely involve:

- Stage 1 – 461 car parks.
- Stage 2 – 319 car parks.

The 461 car parks proposed as Stage 1 reflected the shortfall in parking assessed in the PTC (2013) report. The 319 car parks proposed for Stage 2 reflected the area available and suitable for car-parking at the time as identified within the REF. It should be noted that there was no specific need identified with the PTC (2013) assessment or the REF (GeoLINK 2014) for these additional 319 spaces. Rather, at the time of the assessment it was deemed prudent to allow for the potential requirement for additional car parks associated with the Coffs Harbour Hospital expansion, notwithstanding that there had been no assessment of potential for additional staff or patient numbers associated with the hospital expansion and therefore the future requirement for additional parking spaces was unknown.

Subsequent to the REF (GeoLINK 2014) being approved, Stage 1 was constructed in 2015 and increased the number of car parks on the Coffs Hospital campus by 463 spaces.

As part of the Environmental Impact Statement (EIS) for SSD 8981, SECA Solution were commissioned to undertake an assessment of car park demand and availability in 2018. The SECA Solution report stated there were between 306 and 368 vacant spaces available throughout the day (between 9:30 am and 2:30 pm), with no discernible peak demand being observed during any particular hour of the day. The SECA Solution report concluded that future parking demands associated with the Coffs Harbour Hospital expansion could be accommodated within the existing parking supply and no additional parking spaces would be required.

A subsequent assessment by GTA Consultants (**Appendix D**) was undertaken to address concerns with regard to hospital related parking on Phil-Hawthorne Drive (i.e. off campus) which was unaccounted for in the SECA Solution assessment. The GTA Consultants assessment indicates that there would still be a minimum of 205 car parking spaces available within the hospital campus if all the Phil Hawthorne Drive parking demand was required to be accommodated on-site. Forecasts for parking demand with regard to the proposed hospital expansion are for 81 parking spaces by 2021 and 130 parking spaces by 2026.

Given the GTA Consultant assessment indicates that there would still be a minimum of 205 car parking spaces available within the hospital campus (even if all the Phil Hawthorne Drive parking demand was required to be accommodated on site) the anticipated 2026 parking demand of 130 spaces can be adequately accommodated within the existing available hospital campus parking supply.

### 3. Removal of Condition D12

It is proposed to remove/delete Condition D12 of Development Consent SSD 8981 which states:

*'Prior to the commencement of the operation, the Applicant must construct and operate 319 car parking spaces in the Stage 2 of the at-grade car park approved by the Health Infrastructure on 24 September 2014 (Review of Environmental Factors Approval No: 010/2014).'*

The application is considered to be a modification under Section 4.55(1A) of the EP&A Act (*Modifications involving minimal environmental impact*), which outlines:

*A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:*

- (a) it is satisfied that the proposed modification is of minimal environmental impact, and*
- (b) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and*
- (c) it has notified the application in accordance with:*
  - (i) the regulations, if the regulations so require, or*
  - (ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and*
- (d) it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.*

*Subsections (1), (2) and (5) do not apply to such a modification.*

The application can be considered by the Department of Planning and Environment NSW under this provision for the following reasons:

- As outlined in the Background section above, detailed car-parking surveys have concluded that there is sufficient existing car parking on the hospital campus even when the following parking demands are accounted for:
  - the anticipated increased parking demand of 130 spaces by 2026
  - if the existing parking demand on Phil Hawthorne Drive was to be accommodated on-campus.
- Removal of Condition 12D from the development consent (SSD 8981), which requires the development include construction of an additional 319 car-parking spaces would not result in significant impact to parking availability on campus or result in any other environmental impact. The Coffs Harbour Hospital expansion would be serviced by an adequate provision of on-site car parking.
- The application does not include modification to any other aspect of the approved development (SSD 8981) and therefore it is the same development as the development for which the consent was originally granted.

Section 4.55(3) of the EP&A Act also states as follows:

*'In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15 (1) as are of relevance to the development the subject of the application. The consent authority must also take into consideration the reasons given by the consent authority for the grant of the consent that is sought to be modified'.*

As stated above, the proposed removal of Condition D12 from the development consent (SSD 8981) would not result in significant impact to parking availability on campus or result in any other environmental impact. Further, the application does not include the modification to any aspect of the development (SSD 8981) and therefore is the same development as the development for which the consent was originally granted. The matters for consideration are therefore satisfied and the modification is acceptable.

## 4. Conclusion

This application has been prepared by GeoLINK on behalf of HI to modify SSD 8981 pursuant to Section 4.55(1A) of the EP&A Act. The purpose of this modification is to remove Condition D12 of the consent for SSD 8981 which requires the construction and operation of additional parking as part of the SSD.

The proposed removal of Condition D12 will not alter the environmental impacts assessed and approved as part of the existing development consent. The application does not include modification to any other aspect of development (SSD 8981) and therefore is the same development as the development for which the consent was originally granted.

In accordance with Section 4.55(1A) of the EP&A Act, the Minister or delegate may modify the consent as:

- The consent, as proposed to be modified, is the same development as that originally approved; and
- The proposed modification will not result in environmental impact.

Yours sincerely

**GeoLINK**



**Simon Waterworth**

Director / Town Planner

Attach: A copy of the Notice of Determination for SSD 8981 (**Attachment A**);  
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GTA Consultants (2019) letter report - Coffs Harbour Hospital Expansion – External Parking Demand Analysis (**Attachment D**)