

Dubbo Base Hospital Redevelopment Project – Response to Submissions

SSD DA (SSD 5250)

Issues Raised by Agencies / Organisations / Individuals	Proponent Response
Dubbo City Council	
Council supports the proposal and the delivery of further health infrastructure for the city.	Noted.
1. Staged Development	
<p>The Environmental Impact Statement (EIS) makes the frequent mention of the development being undertaken in 2 Stages, however there is no reference to the staged development provisions of the Environmental Planning and Assessment Act, 1979.</p> <p>It appears that Stage 2 is the expansion to a 3rd storey to the building should funds become available. It is considered that this is not relevant to the current proposal and the EIS should clarify this matter.</p>	<p>The DA seeks approval for Stage 1 of the development (commonly referred to as Dubbo Base Hospital Redevelopment - Stages 1 & 2). What Council has referred to a Stage 2 is in fact Stage 3 of the project. Development of Stage 3 is dependent upon the availability of funding and is to be subject of a separate application at a future date.</p>
2. Development plans	
The submitted plans in Appendix B by Cox Richardson Architecture, do not contain actual dimensions, which is required by Schedule 1, Environmental Planning and Assessment Regulation 2000.	<p>The submitted drawings are consistent with the relevant requirements of Schedule 1 of the Regulation in that existing and future levels are demonstrated, as are the heights (RLs) of the new build floors, amongst other relevant requirements for Site Plans and Sketches. There is no explicit requirement for dimensions for a DA or development of this type.</p>
3. Director General's Requirements	
<p>The Director General's Requirements for the project included compliance with Clause 6, Schedule 2, Environmental Planning and Assessment Regulation 2000, which states:</p> <p><i>An environmental impact statement must contain the following information:</i></p> <p><i>(f) a declaration by the person by whom the statement is prepared to the effect that:</i></p> <p><i>(i) the statement has been prepared in accordance with this Schedule, and</i></p> <p><i>(iii) that the information contained in the statement is neither false nor misleading.</i></p> <p>Council's review of the EIS has not shown this information as being included.</p>	Please refer to the signed Statement of Validity on page v of the EIS.

4. Myall Street	
The potential reopening of the Myall Street railway crossing and any impacts (amenity, access, on-street parking, etc.) including long term car parking needs and locations have not been addressed. This information was provided in Council's correspondence dated 18 April 2012 to the Department of Planning and Infrastructure.	<p>The potential impacts of the reopening of the Myall Street railway crossing was not considered as it is not a committed scheme. To fully assess the impacts of the reopening would require wider network modeling to take account of the route choices that would be made available to the residential/commercial catchment located to the west of the railway line. This would be a data hungry and costly exercise that is not considered to be warranted for a scheme that is not committed. This does not form part of this development.</p> <p>Cardno has nonetheless considered the potential impacts on the development of reopening the crossing. These are set out in Cardno's response letter attached.</p>
5. Infrastructure Services	
There are no details showing sewerage services, new in ground potable water, hydraulic or fire services.	<p>As per pages 18 and 19 of the EIS, a comprehensive services and infrastructure upgrade was undertaken as part of the approved REF and its works package. This concluded that the development is readily able to be serviced.</p> <p>Northrop has also prepared a detailed response to this comment following discussion with Council's relevant officer. The attached letter and plan by Northrop has addressed Council infrastructure (including sewer and potable water), private (hospital-related) sewer and water supply, proposed new sewer and water supplies, and fire protection.</p>
The public exhibition documents including Appendix D Review of Environmental Factors, Appendix C Hydraulic Services Drawings, don't provide any plans. The hard copies provided to Council refer to the attached CD, however those details are not contained on the attached CD.	The CD attached to each copy of the EIS included a full version of the approved REF, including all of its appendices. The appendices to the REF include hydraulic plans at Appendix C.
There is no information in relation to the drainage to the north towards River Street including information on water quality, gross pollutant traps, etc. Also there is no overall catchment plan supplied for stormwater management.	<p>Refer to Section 5.3.2 of the Enstruct report at Appendix D of the REF. This addresses drainage to the north of the site via the railway corridor. Enstruct further liaised with Council in the preparation of the material to respond to comments made during exhibition. Council's officer Mark Finlayson was consulted and according to Enstruct 'he was made aware of all the points ... and understood where the information was first supplied (CD, hard copies and website). He appeared satisfied with the responses supplied.'</p> <p>The OSD tank draining to Myall Street will service the proposed car park. A trash rack is installed within the OSD tank with a sump to capture gross pollutants and sediment before discharging into Myall Street drainage system.</p> <p>The OSD basin (at the north-west boundary) will have a 200mm sump to collect any sediments and free oil from the first flush. Any expected gross pollutant from driveways will be captured in the grated pits before entering the underground system.</p>
It is considered that the interaction of the detained flows with the existing catchment flows need to be addressed so that the peak flows do not coincide to create an issue. In addition, the overland flows along Myall Street will end up in	The Stormwater Management Report, Section 5.6.1 – Myall Street Detention caters for all design runoffs up to and including the 20 year ARI. The discharge into the Myall Street underground system is restricted back to the pre-development 5 year ARI. Due to the new

the railway drain, which may be an issue in larger events.	system overland flow on to Myall Street will be significantly reduced for any storms events greater than 20 years ARI. Therefore no additional overland flow will occur in the railway drain, compared to current conditions.
The downstream underground system may not be a 1 in 10 year system. Council design standards require that this system be designed to a 1 in 10 year system.	The OSD design restricts the discharge to the 5 year ARI pre-development runoff. As outlined in Stormwater Management Report, Section 5.6 for both discharge points.
It is unclear if the design takes into account any upstream flows from the east and whether they impact on the proposed development. In addition it is unclear if the design allows for future expansion of the site or is it expected that further development will remain within the existing building footprint.	Impervious areas from the eastern properties fronting Leonard Street are drained via kerb connections. Remaining overland areas grade to the east towards Leonard Street. The current Myall Street detention system is designed for the proposed development. The existing volume to earth basin situated in the north western corner will be increased to 115m3 and is designed to allow for future expansion.

6. Vehicle parking

Existing parking on the land is proposed to increase with an additional 48 vehicle parking spaces. However, the parking analysis has not considered if the existing parking on the land was adequate and the overall demand of the hospital campus.

It should also be noted that the EIS has contradictory statements in relation to parking spaces. They are stated as currently 350 (staff, patients & visitors) p.8, though the existing carpark (augmented & regraded) to 289 spaces (net gain of 48 spaces) p.18 & p.36.

The statutory assessment undertaken shows that the proposed net increase of 48 on-site car parking spaces meets the requirements for the proposed Hospital extension as set out in Dubbo City Councils' Local Environmental Plan (LEP). The application does not seek to specifically address any parking issues as a result of extant planning permission for the Hospital.

By way of clarification, as part of the proposed redevelopment the main car park is to be upgraded and expanded to provide a total of 289 spaces. This represents an increase of 48 spaces from the current 241 spaces (235 in the main car park and 6 adjacent to the oncology building). Both on-site and off-site parking spaces have been identified in the Traffic Impact Assessment (TIA). The key existing parking zones noted on-site are the main car park and a number of small short-stay car parks which total 329 spaces.

The additional car parking spaces to be provided following the demolition of the maternity building will help contribute to alleviating any existing deficiencies in parking supply.

Cox has provided a sketch plan demonstrating the possible future layout of the car park and likely number of additional spaces. This demonstrates that at least 24 (and up to a maximum of 37) spaces could be provided at some future point.

NSW Office of Environment & Heritage

Based on the submitted documentation it appears that the new works are going to be removed from the significant elements of the site. There is likely to be no impact on significant fabric or the overall heritage significance of the site.	Noted.
The new buildings are unlikely to have impacts on significant views to and from the site.	Noted.
The proposed works are likely to have no archaeological impacts.	Noted.
The recommendations contained in Section 6.2 of the Non – Aboriginal Heritage Assessment for Dubbo Base Hospital prepared by Biosis Research, dated July	Noted.

2012 should be incorporated into any conditions of consent issued for this project.	
These recommendations should also form a part of any Construction Environmental Management Plan, or similar such document, prepared for this project.	Noted.
Roads & Maritime Services	
RMS does not object to the proposed development.	Noted.
It is noted that the proposal would include 289 car parking spaces which would meet the minimum parking requirements of Council.	Noted.
RMS recommends that the proponent consider providing additional onsite car parking spaces, as the parking survey indicates that weekday parking demand exceeds 400 cars from 9 am to 3.30 pm.	<p>It is recognised that the surveys indicated that weekday demand for parking does exceed 400 spaces during the 9am to 3.30pm period. However, it should be noted that Hospital staff and visitors currently use both on-site and off-site parking spaces which have been identified in the Traffic Impact Assessment (TIA) and total 429 spaces. The key parking zones noted are the main on-site car park; Myall Street adjacent to the hospital site's southern end; and a number of small on-site short-stay car parks.</p> <p>The statutory assessment undertaken shows that the proposed net increase of 48 on-site car parking spaces meets the requirements for the proposed Hospital extension as set out in Dubbo City Councils' Local Environmental Plan (LEP). The application does not seek to specifically address any parking issues as a result of extant planning permission for the Hospital. However, with the demolition of the maternity building consideration will be given to additional parking provision above what is required to help contribute to alleviating any existing deficiencies in parking supply.</p> <p>Cox has provided a sketch plan demonstrating the possible future layout of the car park and likely number of additional spaces. This demonstrates that at least 24 (and up to a maximum of 37) spaces could be provided at some future point.</p>
RMS suggests that the proponent could make provision for a designated onsite taxi drop off/pick up area near the main entrance of the hospital.	<p>While there are no dedicated taxi facilities on-site, taxis can currently drop off/pick up passengers at the hospital's main entrance. On-site observations indicated that there were no operational issues in relation to this arrangement based on current levels of demand. Therefore, it considered that any additional demand generated by the proposed redevelopment would be minimal and would not warrant the provision of dedicated taxi facilities on-site.</p> <p>However, the TIA suggests that consideration be given to a shared taxi/pick up and drop off zone located close to the main public entrance of the Hospital. In light of RMS's</p>

	comments it is proposed to provide this shared facility (with appropriate signage and line marking) as part of the development proposal.
Although bicycle parking spaces are included in the proposal, there are no details about providing onsite end of trip facilities for bicycle riders and pedestrians. RMS encourages the proponent consider providing end of trip facilities (eg lockers and showers) for a minimum of 24 people, to complement the 24 bicycle parking spaces that would be provided.	The end of trip facilities (showers and change rooms) formed part of the original submission and plan set - refer Floor Plan - Ground Level (SSD) ARC-NB-21-900. The facilities are found at grid reference C-5. Cox has prepared a mark-up for ease of reference (please see attached).
NSW Environment Protection Authority	
Hazardous Materials	
The EPA notes that the site is contaminated with asbestos. Appropriate disposal of all hazardous waste must be documented in the proposed Construction and Waste Management Plans.	Noted.
A range of suggested conditions is set out with respect to removal, storage and disposal of asbestos, lead-based paints, PCBs and other hazardous materials.	Noted.
The EPA recommends the development of an Unexpected Finds Protocol and finalisation of a Construction Waste Management Plan, together with compliance with WorkCover requirements.	Noted.
Sediment, Erosion and Dust	
The proponent and contractors should focus on achieving a high standard of sediment and erosion control for both pre and post construction activities. This should be addressed in all management and construction plans for the premises	Noted.
The proponent and all contractors should satisfy the relevant guidelines such as Landcom's <i>Soils and Construction, Vol 1, 4th edition</i> - March 2004, and take all appropriate steps to ensure that sediment is controlled on site and that no off-site impacts occur to the surrounding environment.	Noted.
The EPA recommends a series of dust management and prevention measures to ensure dust is managed on-site and from impacting nearby residents during works.	Noted.
Drainage and Surface Water	
All surface water on-site should be appropriately managed to ensure there are no offsite impacts and clearly mitigated and monitored during the project works.	Noted.
The EPA recommends the proponent prepare a detailed Stormwater Management Plan, Air Quality Management Plan and Construction Management Plan to address relevant environmental issues within its submission.	Noted.
Noise (noting that the submission refers to the REF's Acoustic Assessment, not that prepared for the SSD DA)	
Further assessment/information is required regarding the Noise Impact	Noted. The EPA's comments are based on the REF report and not the SSD DA's acoustic assessment. Nonetheless, the same methodology was applied for both acoustic

Assessment and impacts on local noise amenity.	<p>assessments. See further below.</p> <p>In addressing these issues, NDY contacted the relevant EPA officer to discuss the issues and articulate the response formulated. The EPA officer appeared satisfied with the responses, reports prepared, and noise logging rationale. DoPI has also confirmed that a response to the EPA's original submission will be suitable given the later 2nd addendum submission to make reference to the SSD DA rather than the REF was a reissued set of the same acoustic comments / issues.</p>
Noise monitoring was carried out at one location only and was via an unattended logger - as opposed to also including an operator-attended noise monitoring result measured in the vicinity of sensitive receivers.	<p>NDY's noise logging consultant was on and around the site for a period of 24 hours. He selected a location that was not influenced by any mechanical plant or other continuous existing hospital noise sources. Any mechanical plant or noise from the adjacent hospital buildings was not audible during the day, evening or night-time. Therefore, NDY are of the opinion that the noise logging results adequately excludes any existing industrial noise levels.</p>
Due to the location and methodology applied the results of existing noise levels and the noise level criteria may be influenced by existing noise from hospital operations. Such noise should be excluded from results when quantifying background and existing industrial noise levels.	<p>The nursing home to the north of the nominated logging location is the nearest noise sensitive receiver, so in this non-typical development it is practical to place the noise logging equipment on the subject site. In addition the NSW INP requires that a 'representative' background noise level for the day evening and night is obtained from the long-term noise logging. For this particular site NDY is of the opinion that the selected logging location is 'representative' of the background noise level of the residences adjacent to the site along Leonard and Morgan Street. The following conditions onsite were noted which precluded noise logging at the residences along Leonard and Morgan Street. Figure 1 of the NDY response attached to this table also illustrates these points graphically for ease of reference.</p>
The EPA considers that additional monitoring should be carried out and presented to accurately quantify the existing noise environment at the sensitive receivers (eg residences along Leonard and Morgan Sts), excluding existing noise from the subject development, to determine appropriate project specific noise levels for the assessment.	<p>For the reasons set out on page 3 of the NDY response, NDY is of the opinion that the selected noise logging location was appropriate for this site. Given the variability of the extraneous noise sources (railway and road) affecting the residential receivers NDY considers the selected logger location conservative, and as a result the environmental noise criteria derived for the site are also conservative. NDY believes, given the considerations of the existing noise environment at the Dubbo Hospital site, that no further noise logging is necessary.</p>
<p>The EPA has also provided a range of "additional minor comments" on the following:</p> <ol style="list-style-type: none"> 1. The EPA presumes that the proponent has considered the impacts of noise and vibration from demolition, construction, and operation on sensitive nearby receivers and appropriate measures to address them. 2. The NSW Road Noise Policy should be included as a reference to submitted documentation. 3. The Mental Health Unit appears close enough to the railway line to 	<ol style="list-style-type: none"> 1. As per Section 7.5 of NDY's SSD DA report the noise management levels were set at 45 dB LAeq internally for these hospital buildings. Based on typical facade attenuations of approximately 20 dB, NDY set the external noise management level at 65 dB LAeq for hospital buildings. Assessment was undertaken to the doctor's accommodation and child care centre. Noise levels at the accommodation would be similar to that listed as "mammography" in that report. NDY has amended its report (see attached) to make this assessment clearer so appropriate management measures are extended to the accommodation and child care building.

<p>warrant assessment of rail noise and vibration impacts.</p> <ol style="list-style-type: none"> 4. An additional length of the noise attenuation wall (as approved under the REF) could assist if required to protect residences to the east of the hospital. 5. Noise Management Levels (NMLs) for residences should be revised, if necessary, to account for results of any additional noise monitoring. 6. The Noise Management Levels for offices should be 70dBA. 7. No sound power levels for the use of a 815 compactor during construction were shown. No safe working distances with respect to vibration were shown. 8. Noise control measures for highly affected receivers should be included, such as respite periods (if appropriate) and individual consultation with affected parties. 9. The measured noise level chart is difficult to read and should ideally be presented in a day to a page format. 	<ol style="list-style-type: none"> 2. Noted. NDY has updated its report with this information. 3. The mental health building to the west of the site is currently under construction and not part of this REF assessment. 4. An existing fence of approximately 1.5 m currently runs along the entire eastern boundary. The recommended noise wall was modelled in conjunction with the existing fence. The recommended noise wall controls noise emission to those residences directly adjacent to the carpark. The existing fence controls noise to those residences to the north and south of the carpark. For this site, therefore, the noise wall does not need to be extended as suggested. 5. NDY believes the background noise levels from which the NML's are representative and conservative for this area. Therefore, the NML's used in this assessment are appropriate. 6. Noted. The NDY report has been amended. This does not affect the outcome of any of the impact assessments. 7. These units are not vibratory in nature. They compact the soil with specially designed tamping wheels with pads that compress the soil as the vehicle drives over the surface. These machines produce a similar noise and vibration level as that of a dozer or excavator. Table 10-1 of the NDY report has been updated to include this item. The noise level predictions will not be affected. 8. The report is not intended as a noise management plan report, only an impact assessment. However, this point has been noted by NDY and the report has been amended to include these measures to assist the development of a future noise management plan. 9. Noted.
R.F Netour(nearby resident)	
<p>New car park is smaller than the existing one.</p>	<p>The new car park is part of the approved REF for the project. The new car park provides for 289 spaces and is a net gain of 48 spaces for the campus from the current 241 spaces (235 in the main car park and 6 adjacent to the oncology building).</p>
<p>In order to comply with increasing traffic a double storey car park will be needed. Can plans for this be provided.</p>	<p>As stated above, the RMS is of the view that the approved REF's parking provision will cater for the development based on Council's minimum requirements. No further action is required. No double storey car park is proposed. The net increase in parking on the site meets statutory requirements.</p>

