



Your ref: SSD 8981  
Our ref: (0035/19DA)

3 August 2018

NSW Department of Planning and Environment  
Attention: Mr D Gibson  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir,

## **Coffs Harbour Hospital Expansion, 345 Pacific Highway, Coffs Harbour (SSD 8981) – Notice of Exhibition**

Reference is made to the development described above.

Council has reviewed the proposal and wishes to make comment in relation to the following matters:

### **Flooding:**

Whilst the extension is proposed to be at PMF level to provide safer refuge to the occupants of the site, it appears that downstream impacts from the proposed development have not been considered. It is requested that the Department consider the following matters as part of the assessment process and request further information from the applicant where necessary:

- The providing of appropriate access during flood events, consideration should be given to raising new internal roads to PMF level, whilst mitigating the flood impact of raising those roads in the flood plain.

The submitted information states that “because the development is in a flood zone, on site detention tank is not proposed”. Regardless of the proposed development being located in a flood zone, Council is of the view that the inclusion of some form of detention or other mitigation measure/s would be appropriate to minimise the expected impacts of the development. Council is happy to discuss possible mitigation measures.

- The submitted information indicates that the expected downstream impacts will be 20mm to 100 year ARI, which will be wide spread over adjacent land including commercial premises. Council is of the view that this is not an acceptable impact to adjoining land.

It is recommended that the Department seek further advice from the applicant to assist with assessing the nature of the expected impacts, including:

- an assessment of all storms (minor and major e.g. 20yr, 100yr and PMF)), including flow rates and level impacts both pre and post development and how the proponent is mitigating of the post development downstream flood impacts;
  - Information on how the applicant proposes to mitigate the impacts to flooding in accordance with the Floodplain Development Manual (2005) rather than just accept these impacts. Potential mitigation measures can be found in the Boambee Newports Floodplain Risk Management Plan which has been produced in accordance with the Floodplain Development Manual (2005);
  - calculations of impervious, pervious area over a map are to be provided as the balance doesn't seem correct given the impervious area of the surrounding helipad will be turned into impervious car park; and
  - once the above is addressed a copy of the flood model used should be provided to council for their review and comment and also be reviewed by the proponent in order to scrutinize outputs, noting the afflux key has impacts over 50mm, but not shown on the map.
- Council considers that the application has not adequately addressed climate change, sea level rise or increased rainfall intensities particularly with reference to ARR2016 and orographic enhancement that Coffs Harbour experiences due to its unique local rainfall driving mechanisms. Council recommends that the Department seek further information from the applicant in this regard.
  - In relation to assessing flood risk, in accordance with the Floodplain Development Manual (2005), Council recommends that that the SES be consulted as this may alter the emergency management and response planning processes.

#### **Traffic:**

It is requested that the Department consider the following matters as part of the assessment process and request further information from the applicant where necessary:

- A single day traffic survey is considered to be insufficient to accurately model and assess the expected traffic movements for the Pacific Highway and Isles Drive signalised intersection.
- No assessment of the Phil Hawthorne Drive and Stadium Drive intersection or of the adjacent Stadium Drive and Hogbin Drive roundabout has been provided. 'A traffic impact assessment Proposed Relocation of Access to Stadium Drive - Traffic Impact Assessment for Fred Sheridan, Rev 1, 11/ 2016 (de Groot & Benson Pty Ltd)' indicated that Phil Hawthorne Drive movements were predominately associated with the hospital and additional traffic generation from the Health Campus could result in the right turn in to Phil Hawthorne Drive from Stadium Drive causing queuing that blocks the flow of traffic on Stadium Drive. A recent Bitzios Consulting 'Traffic Assessment for Southern Cross University Coffs Harbour Allied Health Building (Rev. 3; 17/04/2018)' indicates that Stadium Drive is the critical leg of the roundabout, which is approaching capacity. With the majority of the traffic being generated by additional staff (333), which the Environmental Impact Statement indicates typically utilise the south car park, it is considered pertinent for impacts on this intersection to be considered.

- Council considers there is potential to extend and connect Phil Hawthorne Drive to Hogbin Drive with a left in / left out. There is also the potential to rationalise the staggered 'T's of the Phil Hawthorne Drive and Stadium Drive intersection with that providing access to the playing fields and crematorium on the south side of Stadium Drive. Council, NSW Roads & Maritime Services and Transport for NSW are currently in the preliminary stages of preparing the 'Coffs Harbour Integrated Transport Strategy', with funding over the next two financial years to create this.
- Further, Council has prepared a 'Bike and Pedestrian Path Masterplan' for the sports and leisure precinct, which incorporates the Health Campus. A cycleway connecting the Hogbin Drive cycleway to the Campus is shown crossing under the bridge at Newports Creek and following Phil Hawthorne Drive. The construction of this infrastructure may justify a reduction in parking demand as the current lack of cycleway connectivity from east of Hogbin Drive (existing) to the Health Campus may be a discouragement to use.
- A 1.8% growth on the road network has been adopted for the Pacific Highway. Typically, 3% growth on major roads is required. This would also be appropriate for Isles Drive. The growth of traffic on Stadium Drive is not considered to have been fully addressed in the submitted information. The assumption that "areas surrounding the CHHC are largely developed and it is unlikely that there will be any significant developments that will impact on traffic growth on the road network near the Campus" does not appear to account for Council's South Coffs Development Control Plan (DCP), which projects an additional 386 lots.

This DCP is currently under review to determine whether the second collector road intersection is better rationalised with the Phil Hawthorne Drive and Stadium Drive intersection. Irrespective, these additional traffic movements would directly impact the Phil Hawthorne Drive and Stadium Drive intersection. The submitted information acknowledges the North Boambee Valley developments as well as the CHEC campus, though the cumulative impact of this on the local road network does not appear to have been appropriately considered in the submitted information. The Southern Cross University currently has a \$12m expansion before Council, with a second stage anticipated (subject to further \$18m in funding). The preliminary North Boambee Rd intersection upgrade provides for two turning lanes to head south on the Highway, indicating a considerable volume of traffic predicted to be travelling south. All of which place an additional impact on the roundabout which the hospital development would also contribute to.

- The traffic assessment found the queue length, post development, exceeds the capacity of the right turn in lane, which would create nuisance, delay and potential conflict on the Highway. Council considers that the assumption that traffic volumes will be reduced with the opening of the bypass to be unrealistic. Traffic assessments associated with the bypass suggest there will only be a negligible change in volume during the peak hours. Further, it assumes that the highway bypass will be open by 2025, for which there is no certainty. Based on the current assessment, Council recommends upgrades will be required to the intersection to cater for the additional traffic. Analysis of additional traffic through utilising both entries may negate this recommendation, though may result in upgrades required elsewhere as previously mentioned.
- The Pacific Highway intersection modelling does not consider a 'base scenario' to compare the impact of the development in the years of 2021, 2026 as well as 2029 (the 10-year

planning horizon). This is pertinent to determine the impact on intersections related to the development (south entry as well as main entry).

### **Car parking:**

It is requested that the Department consider the following matters as part of the assessment process and request further information from the applicant where necessary:

- A single day parking survey is not considered sufficient to accurately quantify the parking patterns and demand on-site. The RMS Guide to Traffic Generation indicated that the private hospital parking rate, which was used in the Report, should only be used when staffing data is unknown. The RMS surveys informing the parking rate had significantly less staff (10 – 102 for 30 to 99 beds). Adopting RMS survey findings in the Guideline indicates that the mean proportion of people who travelled to site by vehicle was 87%. This was based in Sydney and it is reasonable to consider this would be a minimum in a regional centre such as Coffs Harbour. It is considered that the staff parking requirements alone would be significantly more than the 61 – 117 spaces, as projected in the Report. Further, the majority of the 300 vacant spaces on-site were in a 6hr parking limit area (Zone A), which it is assumed would not be suitable for the majority of staff.
- Since the introduction of paid parking in the hospital grounds Council has observed a significant increase in on-street parking on Isles Drive and associated complaints of congestion and nuisance to driveways in the industrial estate. Council has recently line marked this region to mitigate this.
- As well as the unofficial parking behind Zone D, Council is also aware that informal, unmarked parking occurs opposite Zone B, as shown in Figure 2.3. If these vehicles were appropriately parked, it would increase utilisation of the spaces on-site. It also is indicative that the zones and timing may not be appropriate for on-site demand.
- It is recommended that a further review of the car parking numbers required on site, as a result of the development, be undertaken including consideration of parking time and fee structure, to ensure that there are sufficient spaces available for patrons and staff and to mitigate nuisance on the surrounding local road network and businesses.

### **Stormwater:**

It is requested that the Department consider the following matters as part of the assessment process and request further information from the applicant where necessary:

#### Water Quality

- With regard to the water quality component of the stormwater management plan, the plan fails to meet all of Council's pollutant reduction objectives – specifically Total Nitrogen – the report indicates the overall reduction is only 30%, which falls significantly short of the 45% reduction target.
- The report notes a neutral or beneficial (NorBE) effect is achieved, however, this is not necessarily considered an adequate outcome for redevelopment where it generally translates to 'business as usual' or a slight improvement. The objective of Council's WSUD

guidelines is to adopt contemporary standards for redevelopment and, therefore, the pollutant reduction objectives in Council's WSUD guidelines should be achieved.

Another concern is the proposed bioretention swale. Council has no concerns with implementing a bioretention swale, the concern is that the drawings (eg CV-CSB-01133 Rev 03 Sheet 3) indicate that it is just a "Swale Drain" (i.e. no bioretention filter and underdrainage), which will not achieve the same treatment objectives that were modelled with MUSIC.

In summary, it is considered that:

- additional treatment needs to be provided to achieve the pollutant reduction objectives in Council's WSUD guidelines; and
- the submitted drawings need to clearly indicate the detail for a bioretention swale (filter area and underdrainage), where is intended along western side of new carpark.

#### Water Quantity

With regard to the water quantity and permissible site discharges, it is considered that further consideration is required for restricting discharges for smaller events to achieve general criteria of not altering drainage patterns and peak flow rates from the site, particularly for smaller events that affect downstream ecology.

#### **Biodiversity:**

From the information submitted Council is satisfied that the development would not result in unacceptable biodiversity impacts. It is noted that Section 9 of the submitted EIS recommends a number of safeguard measures. Council recommends that these measures be incorporated in a Construction Environmental Management Plan (or similar) and that any development consent be conditioned accordingly.

For further information please contact Renah Givney on 6648 4647.

Yours faithfully



Renah Givney  
Development Assessment Officer – Senior