



Office of Environment & Heritage

Our Ref: DOC18/458365
Your Ref: E-mail dated 3 July 2018

Director Planning and Environmental Services
Division of Priority Projects Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Erin White

Dear Ms White

Re: Re: Coffs Harbour Hospital Expansion (SSD 8981) – 345 Pacific Highway, Coffs Harbour

Thank you for your email dated 3 July 2018 about the proposed expansion to Coffs Harbour Hospital seeking comments from the Office of Environment and Heritage (OEH). I appreciate the opportunity to provide input.

The OEH has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats), Aboriginal and historic heritage, National Parks and Wildlife Service (NPWS) estate, flooding and estuary management. The OEH does not consider it likely that the proposal will have any significant impact on biodiversity values nor does it provide any issues for impacts to NSW NPWS estate. Our previous correspondence of the 20 April 2018 waived the requirement for a Biodiversity Assessment Report (BDAR) on this basis.

We have reviewed the documents supplied and advise that, although we have no concerns about NPWS estate, historic heritage, a number of issues are apparent with respect to the assessments for estuaries and flooding, and Aboriginal cultural heritage. These issues are discussed in detail in **Attachment 1** to this letter. In summary, the OEH recommends:

1. That the ACH advice be amended in its title to be an Aboriginal cultural assessment report
2. That the 5 recommendations listed on pages 13-14 of the ACH advice be included in the CMP for the project
3. The ground floor of the proposed building has a minimum finished floor level of 5.9m AHD
4. The proposed building be protected to the Probable Maximum Flood (PMF - 6.1m AHD) height by road kerbs or other measure;
5. The proposed building be constructed of flood resilient materials to the PMF flood level of 6.1m AHD
6. All wiring, power outlets, switches, etc., should, to the maximum extent possible, be located above the PMF flood level of 6.1m AHD. All electrical wiring installed below the relevant flood level should be suitable for continuous submergence in water and should contain no fibrous components

7. Impacts of proposed building and earthworks be less than or equal to 10mm in the 100-year ARI flood event for adjacent properties or works being carried after or concurrently with flood mitigation options from the 'Boambee – Newport's Creek Floodplain Risk Management Plan, Coffs Harbour City Council', that lower flood level at the Health Campus.

If you have any further questions about this issue, Mr Ross Wellington, Conservation Planning Officer, Regional Operations, OEH, can be contacted on 6640 2514 or at Ross.Wellington@environment.nsw.gov.au.

Yours sincerely



23 July 2018.

RACHEL LONIE

**Acting Senior Team Leader Planning, North East Branch
Regional Operations**

Contact officer: ROSS WELLINGTON
6640 2514

Enclosure: Attachment 1: Detailed OEH Comments – Coffs Harbour Hospital Expansion (SSD 8981) – 345 Pacific Highway, Coffs Harbour

Attachment 1: Detailed OEH Comments – Coffs Harbour Hospital Expansion (SSD 8981) – 345 Pacific Highway, Coffs Harbour

1. Aboriginal cultural heritage

The OEH has reviewed the *Aboriginal Heritage Due Diligence Assessment - Coffs Harbour Health Campus Redevelopment, Coffs Harbour, NSW* (Everick Heritage Consultants Pty Ltd dated 30 October 2017).

The OEH noted the Aboriginal cultural heritage (ACH) advice provided in support of the proposal had a reference in the title to the 'due diligence assessment' component of the assessment undertaken.

Normally, the OEH would not review an assessment that has been submitted under a due diligence title. This is because the due diligence process is one of the defences from prosecution under the *National Parks and Wildlife Act 1974* (NPW Act). We could potentially fetter our capacity to be an independent and credible regulator if we provide advice on a proponent's consideration of their obligations under the NPW Act. On this occasion however, as our advice is provided to Planning and Environment to inform their function as the consent authority, it would be obstructive to not review the information provided to determine its appropriateness to support the proposed development.

The OEH review has found the advice on ACH for the Coffs Harbour Health Campus Redevelopment to be a complete archaeological and cultural assessment that refers to the additional steps undertaken to inform the consideration of the potential for the proposed development to impact on Aboriginal objects.

The information provided includes recommendations of a standard that could be utilised to inform a Construction Management Plan for the proposal and refers to the 'due diligence code' as having been applied in a section of the overall assessment.

Based on the information provided, the OEH has no concerns over ACH for the proposed redevelopment providing the cover letter on the ACH advice is updated to reflect its purpose as an Aboriginal cultural heritage assessment (rather than a due diligence report) and that the five (5) recommendations listed on page 13-14 of the advice are included in the Construction Management Plan for the project.

OEH Recommendations

1. That the ACH advice be amended in its title to be an Aboriginal cultural assessment report;
2. That the 5 recommendations listed on pages 13-14 of the ACH advice be included in the Cultural Management Plan for the project.

2.0 Flooding

Background

The existing floor level of hospital 5.6m AHD. The 100yr flood level is 4.9m AHD eastern side and 5.5m AHD western side of proposed development. The Probable Mean Flood (PMF) level is 5.8m AHD eastern side and 6.1m AHD on the western side of proposed development. Flood issues are addressed in the EIS with detailed information provided in Appendices Q and T.

Proposed Works

The proposed new building will be protected to the Probable Maximum Flood (PMF) level by ensuring that entrances are located where the ground floor level is at or above the PMF level, or protected from the PMF level by road kerbs or other measures.

Design of the building fabric is to consider that flood levels may be higher than the exterior ground level adjacent to the new building. The ground floor level of the new building will be set at RL 5.9 m AHD.

A number of parameters were assessed when setting the ground floor level of the new Clinical Services Building, including:

- The PMF level;
- Hospital operational requirements;
- Future ground floor expansion within the building footprint of the new Clinical Services Building;
- Existing building levels at ground floor and Level 1;
- Required floor to floor and ceiling height at ground floor footprint of the new Clinical Services Building.

The flood assessment indicates that the proposed new building has a minor impact on surrounding flood levels. The increase in flood levels in the 1% Annual Exceedance Probability (AEP) event is less than 20 mm, see Figure below:



Figure 3-6: Flood Afflux for 100 year ARI storm events due to proposed development (critical storm duration of 9hr)

Flooding comments

The Coffs Harbour Hospital is an essential service for the Coffs region. It is on a flood affected site. In the flood event of 2009 the hospital remained staffed and operational but with a reduced operational capacity as the highway access was blocked or reduced due to flooding. Flood waters lapped the Emergency Department entrance located at the western end of the complex.

To address flood issues for the proposed works the applicant has incorporated several design features into the proposal including an elevated floor level compared to the existing building and protection of building to the PMF flood level. From the assessment undertaken of the potential flood impacts for the 100-year Average Recurrence Interval (ARI) flood event are less than 20mm and do potentially impact adjacent industrial / commercial property to the north.

OEH would prefer for the impacts to be 10mm or less as this is considered being within the limits of modelling accuracy and as having minimal impact. Compensatory works or adjustment of the proposed design should be considered to reduce the flood impact so that it is 10mm or less. Alternatively, Coffs Harbour City Council have a 'Boambee – Newports Creek Floodplain Risk Management Plan' that has recommended mitigation options to lower flood levels at the Health

Campus. The proposed works being undertaken after or concurrently with the flood mitigation strategies for the Health Campus area would be acceptable.

OEH Recommendations

The OEH has no objection to the proposed works subject to the following conditions:

3. The ground floor of the proposed building has a minimum finished floor level of 5.9m AHD
4. The proposed building be protected to the Probable Maximum Flood (PMF - 6.1m AHD) height by road kerbs or other measures
5. The proposed building be constructed of flood resilient materials to the PMF flood level of 6.1m AHD
6. All wiring, power outlets, switches, etc., should, to the maximum extent possible, be located above the PMF flood level of 6.1m AHD. All electrical wiring installed below the relevant flood level should be suitable for continuous submergence in water and should contain no fibrous components
7. Impacts of proposed building and earthworks be less than or equal to 10mm in the 100-year ARI flood event for adjacent properties or works being carried after or concurrently with flood mitigation options from the 'Boambee – Newport's Creek Floodplain Risk Management Plan, Coffs Harbour City Council', that lower flood level at the Health Campus.

Note:

ARI – Average Recurrence Interval is the long-term average number of years between the occurrence of as big as or larger than the selected event. For example, floods with a discharge as great as or greater than the 20-year ARI flood event will occur on average once every 20 years.

PMF - Probable Maximum Flood is the largest flood that could conceivably occur at a particular location, usually estimated from probable maximum precipitation and coupled with worst flood producing catchment conditions.

