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Port Macquarie Base Hospital Expansion

May 2012

Prepared for

HEALTH INFRASTRUCTURE
NSW HEALTH

Major Project Application MP 11_0012
Response to Submissions

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10 May 2012
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Date
This document is for discussion purposes only unless signed.

Tables

Appendices

A Tree Impact Assessment Drawing, dated 30 April 2012
Prepared by Naturally Trees

B Bushfire Threat Assessment Response to Submissions Report, dated 26 April 2012
Prepared by BCA Check Pty Ltd

C Ecological Response to Submissions Report, dated May 2012
Prepared by ERM

D Pedestrian Paths and Crossings Plan;
Pedestrian Strategy; and
Pedestrian Plan for short term drop-off area.
Prepared by TTW

E Amended Traffic and Parking Report, dated May 2012; and
Turning paths for the car park to the north of Rotary Lodge.
Prepared by TTW

F Acoustic Response to Submissions Report, dated 26 April 2012
Prepared by Acoustic Logic

G Amended Acoustic Assessment, dated 26 April 2012
Prepared by Acoustic Logic

H Traffic and Parking Response to Submissions Report, dated 9 May 2012
Prepared by TTW

1 Introduction

1.1 Preliminary

This Response to Submissions Report has been prepared by Architectus Group Pty Ltd on behalf of the Proponent, Health Infrastructure, to provide a response to the submissions received during the exhibition period of Major Project Application MP 11_0012 for the proposed Port Macquarie Base Hospital Expansion, Wrights Road, Port Macquarie.

The Environmental Assessment (dated February 2012) was submitted to the NSW Department of Planning and Infrastructure and exhibited between 8 March and 6 April 2012.

This Response to Submissions Report provides a detailed response to the issues raised in the submissions, and includes modifications to the draft Statement of Commitments.

The Response to Submissions Report is structured as follows:

- **Section 2: Responses to submissions**

  This section outlines the Proponent's response to each individual submission from State and local government departments and agencies and the public.

- **Section 3: Revised Draft Statement of Commitments**

  Amendments have been made to the draft Statement of Commitments in response to submissions received.

- **Section 4: Conclusion**

This report should be read in conjunction with the plans and documentation provided at **Appendices A** to **H**.

2 Response to submissions

2.1 Introduction

This section of the report provides a response to submissions received during the statutory exhibition period between 8 March and 6 April 2012. Submissions were received from the Port Macquarie-Hastings Council, from State government agencies and one from the public.

2.2 Department of Planning and Infrastructure

Table 1 provides the Proponent's responses to the issues raised by the Department of Planning and Infrastructure following its review of submissions received.

Table 1. Department of Planning and Infrastructure (DPI) submission

DPI Comment	Response
Further clarification required regarding the trees proposed to be removed, including clearly identifying all the trees to be removed for the building works and trees to be removed and retained within the proposed APZ.	A plan has been prepared clarifying the location of the trees to be removed and this is attached at **Appendix A.**
Demonstrate that the proposed APZ is consistent with Planning for Bushfire Protection 2006 requirements.	A response report has been prepared by the bushfire consultant on bushfire requirements and this is attached at **Appendix B**. The report addresses in detail the proposed development against the Planning for Bushfire Protection 2006 requirements. It finds that the facility in general will have a higher level of bushfire safety with the development proceeding as outlined in the following points: • The recommended asset protection zone (Table A3.4 PBP2006) and landscaping comply with Planning for Bushfire Protection 2006. • Evacuation plans/procedures are to be prepared and submitted to the RFS for approval prior to occupation. • The proposed building will have construction standards that will limit the risk of ignition i.e. compliance with AS 3959-2009 for BAL 40 (even though BAL 29 will comply). • Upgrading the existing buildings for ember protection to external openings i.e. vents may be considered and is at the discretion of the RFS however it is recommended that as a minimum there must be procedures in the evacuation plan to ensure all windows and doors are closed in a local bushfire event.
Provide further information and potential locations of compensatory planting.	Initial discussions with Council indicate that suitable land will be difficult to secure for the project in the Council area. Nonetheless, investigations for a suitable compensatory planting site have commenced. The Proponent is planning to undertake a Biobanking assessment of the project to assess the number and type of credits that would be required to offset the impact of the project using the Biobanking Offsets Scheme managed by the NSW Office of Environment and Heritage (OEH). This approach has the support of OEH and the Council, as indicated during phone calls in late April 2012. The Biobanking Assessment report will be presented to the Department of Planning and Infrastructure once complete, in order to progress with the compensatory planting and offset component of the project. Refer to the ERM response to submissions report at **Appendix C**. The Statement of Commitments at **Section 3** has been amended to require the submission of the Biobanking Assessment report to DPI prior to issue of a Construction Certificate.

DPI Comment	Response
A pedestrian circulation plan for the hospital campus shall be provided, including circulation from public transport and car parking areas.	A Pedestrian Paths and Crossings Plan has been prepared and is included at **Appendix D**.
Further justification for exemption from Council's section 94A development contributions plan.	The proposed development will facilitate delivery of important health services to both the local community, and the wider Mid North Coast Region. The purpose of Council's contributions levy under Section 94A is to seek contributions to cover the demand for additional services and facilities generated as a result of increased residential population and employment. The proposed development will assist in the provision of services, rather than creating extra demand. The Environmental Assessment demonstrates that the proposed development can be undertaken using existing services and augmenting these services if necessary to cater for the increased capacity. The proposed development provides public amenities and service and therefore meets the criteria of "provision of infrastructure" under Section 94ED(1)(a) of the EP&A Act which includes reference to: *"the provision, extension and augmentation of (or the recoupment of the cost of providing, extending or augmenting) public amenities or public services, affordable housing and transport or other infrastructure relating to land".* Therefore, Section 94EE (1) of the EP&A Act applies which states that the Minister is to determine development contributions for the provision of infrastructure. In determining the level and nature of development contributions, *"the Minister is, as far as reasonably practicable, to make the contribution reasonable having regard to the cost of the provision of infrastructure in relation to the development or class of development"* (section 94EE(2)(a)). Due to the nature and scale of the public amenities and services provided by the proposed development, it is considered that no development contribution should be imposed for the development.

2.3 Port-Macquarie-Hastings Council

Table 2 provides the Proponent's responses to the issues raised by the Port Macquarie-Hastings Council in their submission.

Table 2. Port Macquarie-Hastings Council (PMHC) submission

PMHC Comment	Response
Traffic, transport and parking	
1. Clarification should be sought on the total number of car parks proposed to be provided. The TTW report outlines 719 spaces are proposed yet elsewhere in the supporting information it is suggested 740 spaces will be provided. The plans on exhibition only appear to detail 677 spaces.	The Traffic and Parking Report has been amended to show 748 parking spaces. Refer attached report at **Appendix E**.
2. The existing car parking area to the north of Rotary Lodge is proposed to have access along the western side blocked off which would appear to create manoeuvring issues for vehicles entering and exiting the angled spaces. The landscape plan is also inconsistent with the site plan relating to this car parking area.	The western side of the car park to the north of Rotary Lodge is not proposed to be blocked off. There will be new kerbing on this western side as indicated on the plans, however the turning paths for this car park will be able to be achieved as shown at **Appendix E**. The landscaping in this part of the site was approved as part of the Part 5 Review of Environmental Factors approval, dated 2 December 2011. Nevertheless, the landscape plan is not considered to be inconsistent with the site plan in this area.
3. TTW have identified desired pedestrian links and stated that appropriate pedestrian facilities will be provided. It is unclear as to whether any pedestrian footpath link will be made to the rear of the buildings including from the existing bicycle and pedestrian shareway within the Oxley Highway road reserve (currently a number of informal tracks exist in this area and it would be an opportune time to formalise	A review of pedestrian paths and crossings within the hospital campus has been carried out and a plan is attached at **Appendix D**. A written Campus Pedestrian Strategy is also attached at **Appendix D.**

PMHC Comment	Response
a practical and safe pedestrian access in this location) or from the crossing point of this shareway intersecting with Wrights Road. In addition, more investigation is recommended for additional formal footpath pedestrian connections through the Wrights Road reserve to Merrigal Road and to and from the UNSW Rural Clinical School. Pedestrian and bicycle accessibility to the site should be investigated further at project application stage rather than addressing with a future Transport Management Strategy.	
4. Consideration should be given to the provision of an emergency/relief access road from Toorak Court to the proposed parking area, with the access being limited to emergency and staff vehicles only.	A secondary access to the hospital campus, connecting to Lake Road via Toorak Circuit, is not required for the current proposal (refer amended Traffic and Parking Report at **Appendix E**). In addition, such a connection is not possible at the current time because the land is under separate ownership. It is understood that Council is currently in discussions with the owners of the relevant parcel of land with a view to purchasing this property (or some other arrangement that might be possible) so that a second access road to the hospital could at a future time be achieved.
Ecology	
1. The proposal includes the removal of 83 eucalypts (including Tallowwood, Forest Red Gum, Swamp Mahogany). 62 have been previously planted and 21 are remnant. The arborist report prepared by Naturally Trees has confirmed trees which require removal and which trees are proposed to be retained. It is unclear however as to whether the proposed additional stormw ater and sewer infrastructure and erosion and sediment control measures will impact on tree retention.	The proposed additional stormwater and sewer infrastructure will not impact on tree retention. A plan clarifying the trees to be removed is attached at **Appendix A**. Erosion and sediment control measures have been addressed in the Review of Environmental Factors for other development works prepared under Part 5 of the EP&A Act and approved on 2 December 2011.
2. The ERM ecological assessment identifies that the hospital grounds support a resident population of koalas with high activity recorded. The ERM report concludes that with the adoption of mitigation measures including required offset planting at 2:1 ratio the proposal will not have a significant impact on the koala. ERM state that the hospital site has limited space available to accommodate the required compensatory planting. It is assumed that 166 trees are required to be planted (this is likely to be more based on point above) however there is no detail on the number and location of replanting that is achievable on the site. ERM have identified that an appropriate off0site location needs to be identified to accommodate tree planting where it is unable to be carried out on site. This off site location needs to be secured as part of any project approval and it is considered necessary that a koala plan of management is required to ensure the long term management of koala habitat on the site (and any off site location).	Initial discussions with Council indicate that suitable land will be difficult to secure for the project in the Council area. Nonetheless, investigations for a suitable compensatory planting site have commenced. The Proponent is planning to undertake a Biobanking assessment of the project to assess the number and type of credits that would be required to offset the impact of the project using the Biobanking Offsets Scheme managed by the NSW Office of Environment and Heritage (OEH). This approach has the support of OEH and the Council, as indicated during phone calls in late April 2012. The Biobanking Assessment report will be presented to the Department of Planning and Infrastructure once complete (required by Statement of Commitments, refer **Section 3**) in order to progress with the compensatory planting and offset component of the project. Refer to the Ecological response to submissions report at **Appendix C**.
Noise	
1. The noise impact assessment supporting the application mainly assesses potential noise impacts on adjoining sensitive receivers (i.e. nearby residences) and with the exception of section 6.6 does not appear to consider the operational noise impacts on the hospital patients residing within the hospital. Ideally, the potential operational noise impacts on hospital patients residing within the hospital should be assessed against the Industrial Noise Policy amenity criteria for a hospital ward which is given for the noisiest 1-hour period as being 35dB(A) ANL with a recommended maximum of 40dB(A). Externally, the ANL and recommended maximum are 50dB(A) and 55dB(A) respectively. These stated noise levels indicates the noise attenuation (externally to internally) is assumed to be 15dB(A) and this refers directly to the following point.	Noise impacts from proposed developments to surrounding receivers (outside of the hospital) are generally required to be assessed as part of DA/Part 3A application requirements. This establishes relevant noise goals for the future development to comply with, so as to not intrude on the amenity of the surrounding land users. Noise impacts to internal/external areas within the hospital are typically required to be assessed in order for the hospital to be "fit for purpose" rather than being a Council / consent authority issue. Typically, noise levels from mechanical plant will be acoustically designed so as to be compliant with AS2107 for internal areas (the most relevant standard for services noise to indoor spaces) and to 50 – 55 dB(A) for occupied outdoor areas (consistent with EPA guidelines for passive outdoor areas). It is proposed to adopt these standards on this project. Detailed acoustic design is being undertaken as services design for the hospital is being developed. Refer to Acoustic response to submissions report at **Appendix F**.
2. With regard to construction noise and vibration, under Section 5.4.1.1 the report assumes there is a 25dB(A) noise attenuation due to the hospital building construction. Refer to the asterisked note under Table 8 on page 12. The INP Table 2.1 Amenity criteria on page 16 for 'Hospital ward – internal and external ANL and recommended maximum noise levels appears to assume a 15dB(A) noise	Section 5.4.1.1 of the Acoustic Report submitted with the Part 3a application assumes a 25 dB(A) noise reduction from external to internal areas. This is based on previous measurements undertaken by this office for construction works occurring on or adjacent to existing hospitals, where the noise reduction resulting from standard façade construction with windows closed (as is typically the case) was

PMHC Comment	Response
attenuation from outside to inside a hospital building, not 25dB(A) on which the potential impacts have been assessed.	found to be in the order of 20 – 25 dB(A). Council has referred to allowable external noise levels of 50dB(A) externally and 35dB(A) internally, and from this inferred that typical noise reduction through façade is 15dB(A). The Acoustic consultant advises that in their opinion this is not correct. 50dB(A) is a target noise level for appropriate amenity of external areas, 35dB(A) for internal areas. They are separate noise goals for separate spaces, and not an inference as to façade performance. As noted in the Acoustic Report submitted with the Part 3A application, construction noise impacts are an important consideration for the hospital. The project is now moving towards an Early Works phase, and a detailed construction program including selection of construction methods (excavation, soil compaction and piling most notably), is being developed. Acoustic review of both noise and vibration has been a part of the development of the program, and a Construction Noise and Vibration Management Plan which includes both nearby development and the hospital itself is being developed to ensure noise and vibration impacts are mitigated and managed as much as practicable. Refer to the Acoustic response to submissions report at **Appendix F**.
3. The report does not appear to have assessed the potential impact of mechanical plant noise as the mechanical plant was unknown at the time of the acoustic assessment being carried out however the Report concludes that the currently unknown mechanical plant will comply with the relevant criteria. The Report notes that an acoustic assessment of the mechanical plant is required at Construction Certificate stage, once the mechanical plant has been selected and the installation location is known.	Detailed acoustic design of mechanical services can only be undertaken once plant is selected. This process is not underway, with acoustic treatments for all major plant items to be determined at the Detailed Design Report milestone. Refer to the Acoustic response to submissions report at **Appendix F.**
4. The Report appears to have inconsistent use of the now superseded ECRTN and the current NSW Road Noise Policy.	The reference to ECRTN in section 5 of the Acoustic Report has been corrected (it now refers to DECC Road Traffic Noise Policy). Refer amended Acoustic Report at **Appendix G**. However, it is correct to refer to the ECRTN in section 6.3 of the Acoustic Report. Section 6.3 contains an assessment of loading dock noise, not road traffic per se. The concern was truck air-brakes. The best test for sleep disturbance, as is recommended in the current Application Notes of the Industrial Noise Policy, is the ECRTN. Even though as a traffic noise guideline the ECRTN is now superseded, it remains the better document for assessing an issue of Sleep Disturbance.
Draft Conditions from PMHC	
MP11-0012 – Port Macquarie Base Hospital Expansion – LOT: 23 DP: 1099567, 1 Wrights Road PORT MACQUARIE (1) Payment to Council, prior to commencement of works of 94A contributions. The contributions are levied, pursuant to the Environmental Planning and Assessment Act 1979 as amended, and in accordance with the provisions of Port Macquarie-Hastings Section 94A Levy Contributions Plan 2007 based on 1% of the cost of the development. Contribution amounts are subject to adjustment in accordance with CPI increases adjusted quarterly and the provisions of the plan.	This condition should not be adopted as the proposed development is an important piece of community infrastructure which will facilitate the delivery of vital health services to the local community and the wider North Coast region. Further contributions are considered unnecessary and inappropriate given the nature and scale of the development. Refer to response to DPI issues in **Section 2.2**.
(2) As part of Notice of Requirements by Port Macquarie-Hastings Council as the Water Authority under Section 306 of the Water Management Act 2000, the payment of a cash contribution, prior to the commencement of works, of the Section 64 contributions levied in accordance with the provisions of the relevant Section 64 Development Servicing Plan towards the following: • augmentation of the town water supply headworks • augmentation of the town sewerage system headworks Contribution amounts are subject to adjustment in accordance with CPI increases adjusted quarterly and the provisions of the plans.	The costs indicated by Council to date are considered unreasonable. For this reason, discussions have been carried out with Council in relation to water main augmentation. A new water main connection for the hospital potable water to the existing 300mm main located on the western boundary of the site has been agreed with Council. The existing 150mm connection will be retained for fire services protection (fire hydrants and fire sprinklers). Documentation will be prepared on behalf of Health Infrastructure and submitted to Council for formal approval of the connection to the 300mm main prior to the issue of a Construction Certificate. Refer amended Statement of Commitments at **Section 3**. In addition, negotiations are currently underway with Council in relation to sewerage system headworks. The Council is currently undertaking modelling to determine if augmentation of the sewerage

PMHC Comment	Response
	system headworks will be required. Health Infrastructure has engaged an independent consultant to review the Council data.
(3) All public water, sewer and stormwater services necessary to service the development must be designed and constructed in accordance with Council's AUSPEC Specifications. Construction details are to be submitted to Port Macquarie-Hastings Council for endorsement prior to commencement of work.	This condition should not be adopted as all agreed water and sewer (if required) infrastructure upgrade works will be carried out by Council. Refer response above.
(4) The proposed instantaneous water supply demands are to be increased from 9 to 14 litres per second. This will increase the head losses in the 200mm pipe in Wrights Road to an unacceptable level. The provision of a duplication of this main from the Oxley Highway to opposite the hospital entrance, a distance of about 60 metres, is required at no cost to Council.	Refer response to proposed condition (2) above.
(5) The proposed development will increase the sewage flows beyond the capacity of the existing downstream infrastructure necessitating augmentation of the system. Augmentation required involves: 1. Upgrading the sewer main from 250mm to 375mm. 2. Augmentation of the downstream sewer pumping station. 3. Upsizing critical components within the reticulation system. This work is to be carried out in accordance with Council's adopted AUSPEC Design and Construction Specification. Costs associated with these works shall be the responsibility of the proponent.	As noted above, the existing sewer system is currently being modelled by Council to confirm actual system capacity and whether additional loads from the hospital development would require augmentation of sewerage system headworks.
(6) Footings and/or concrete slabs of buildings adjacent to sewer lines or stormwater easements are to be designed so that no loads are imposed on the infrastructure.	This condition is acceptable.
(7) All connections to the sewer main shall be directly to a new or existing manhole.	This condition is acceptable.
(8) Where a sewer manhole exists within a property, access to the manhole shall be made available at all times. Before during and after construction, the sewer manhole must not be buried, damaged or act as a stormwater collection pit. No structures, including retaining walls, shall be erected within 1.0 metre of the sewer manhole or located so as to prevent access to the manhole.	This condition is acceptable.
(9) Development works on public property or works to be accepted by Council as an infrastructure asset are not to proceed past the following hold points without inspection and approval by Council. Notice of required inspection must be given 24 hours prior to inspection, by contacting Council's Customer Service Centre on (02) 6581 8111: a. prior to commencement of site clearing and installation of erosion control facilities; b. at completion of installation of erosion control measures; c. prior to installing traffic management works; d. at completion of installation of traffic management works; e. at the commencement of earthworks; f. before commencement of any filling works; g. when the sub-grade is exposed and prior to placing of pavement materials; h. when trenches are open, stormwater/water/sewer pipes and conduits jointed and prior to backfilling; i. at the completion of each pavement (sub base/base) layer; j. before pouring of kerb and gutter; k. prior to the pouring of concrete for sewerage works and / or works on public property; l. on completion of road gravelling or pavement; m. during construction of sewer infrastructure; n. during construction of water infrastructure; o. prior to sealing and laying of pavement surface course. At works at each hold point shall be certified as compliant in	This condition is acceptable.

PMHC Comment	Response
accordance with the requirements of AUSPEC Specifications for Provision of Public Infrastructure and any other Council approval, prior to proceeding to the next hold point.	
(10) Prior to occupation, submission of a Compliance Certificate accompanying Works as Executed plans with detail included as required by Council's current AUSPEC Specifications. The information is to be submitted in electronic format in accordance with Council's "CADCHECK" requirements detailing all infrastructure for Council to bring in to account its assets under the provisions of AAS27.	This condition should not be adopted as all agreed water and sewer (if required) infrastructure upgrade works will be carried out by Council.
(11) All works shall be certified by a practicing Civil Engineer or Registered Surveyor as compliant in accordance with the requirements of AUSPEC in accordance with the *Council's Interim Requirements for the Maintenance and Certification of Public Infrastructure Provided Through Land Developments* (dated 6 September 2010).	This condition should not be adopted as all agreed water and sewer (if required) infrastructure upgrade works will be carried out by Council.
(12) A Certificate of Compliance under the provisions of Section 307 of the *Water Management Act* must be obtained prior to occupation.	This condition should not be adopted as Council all agreed water and sewer (if required) infrastructure upgrade works will be carried out by Council.
(13) Any necessary alterations to, or relocations of, public utility services to be carried out at no cost to Council and in accordance with the requirements of the relevant authority.	This condition should not be adopted as no hydraulic services diversions or alterations are required.
(14) Monitoring of traffic queuing/delays up to 12 months following completion of the expansion works with NSW Health giving Council an undertaking to provide additional vehicular storage capacity in Wrights Road should the monitoring confirm traffic impacts on the Highfields Circuit roundabout as a result of queuing from the Oxley Highway roundabout.	This condition should not be adopted as the Proponent's traffic engineer has confirmed that the hospital expansion will have minimal impact upon the Oxley Highway roundabout (refer Traffic and Parking response to submissions report at **Appendix H**).
(15) Provision of traffic controls to ensure traffic exiting the hospital main access road onto the Highfields Circuit is controlled to safe speeds.	Within the hospital grounds the speed limit is reinforced with 30km/h signage. The road lengths and geometry is conclusive to this low speed environment. Furthermore, the existing roundabout at the Hospital entry/exit is considered a traffic calming device to ensure vehicles exit at a safe speed (refer Traffic and Parking response to submissions report at **Appendix H**).
(16) Upgrades of the main access road between Highfields Circuit and the hospital main entry to provide a 7m wide carriageway and off road shared walkway/cycleway linking with the existing network in Wrights Road.	This proposed road/cycle/pedestrian link is within Council property and should be considered as part of the Council's Traffic Management Plan for the area in order to address the local resident's needs and requirements (refer Traffic and Parking response to submissions report at **Appendix H**). In addition, the amended Statement of Commitments at **Section 3** requires the Proponent to prepare a Transport Management Plan which will include consideration of further cycle / pedestrian pathways, facilities for cyclists and encouragement of these options amongst hospital staff.
(17) The Construction Traffic Management Plan is to be submitted to and endorsed by Council prior to commencement of work.	This condition is acceptable.
(18) Prior to construction, a detailed site stormwater drainage design, incorporating on site stormwater detention facilities must be prepared and certified by a qualified practising Civil Engineer. The design must be prepared/amended to make provision for the following: a. All stormwater and surface water discharging from the proposed development site, buildings and works must be conveyed via gravity with AS 3500.3 and Council's AUSPEC Specifications. b. Stormwater discharge from the development site must be controlled by structural measures (such as the existing on-site stormwater detention basin) to ensure that post development stormwater flows do not exceed pre-development flows for all storm events up to and including the 100 year ARI event. c. The design must incorporate water quality controls in accordance with Council's AUSPEC D7 Specifications. d. The system must make provision for the natural flow of stormwater runoff from uphill/upstream properties/lands. The system must include the collection of such waters and discharge	This condition is acceptable.

PMHC Comment	Response
to the Council drainage system. e. Plans must specify that any components of the existing system to be retained must be checked during construction to be in good condition and of adequate capacity to convey the additional runoff generated by the development, and be replaced or upgraded if required. f. Plans must be accompanied by a best practice maintenance schedule for the on-site stormwater detention facilities and water quality controls.	
(19) Works-as-executed plans of the stormwater drainage system, certified by a Registered Surveyor, together with certification by a qualified practising Civil Engineer to verify that the drainage system has been constructed in accordance with the design and relevant Australian Standards, must be provided to Council at the completion of works. The works-as-executed plan(s) must show the as built details in comparison to those shown on the approved drainage plans. All relevant levels and details indicated must be marked in red on a copy of the stamped Construction plans.	This condition is acceptable.

2.4 Transport for NSW

Table 3 provides the Proponent's responses to the issues raised by Transport for NSW in their submission.

Table 3. Transport for NSW (TNSW) submission

TNSW Comment	Response
The Traffic and Parking Report proposes that the bus stop at the hospital be moved from in front of the main hospital entry ramp, to the southern side of Wrights Road. While this distance is not great, the impact on bus passenger access across Wrights Road is not appropriately addressed in the Environmental Assessment. Future passengers would have to cross the path of all vehicles (including trucks) accessing the hospital, which posses an increased risk to bus passenger safety. The provision of a safe crossing (e.g. zebra crossing) is not mentioned in the report. Additionally the provision of an accessible path of travel, in relation to the *Disability Discrimination Act 1992,* should be addressed.	A Pedestrian Paths and Crossings Plan is attached at **Appendix D** which indicates the location of pedestrian crossings on the hospital site, including the crossing from the proposed new bus stop. A written description of the pedestrian strategy for the hospital is also attached at **Appendix D,** along with a detailed plan showing pedestrian and drop-off arrangements for the emergency department short-term parking area. All access points are intended to be suitable for people with prams or who experience difficulty with walking.
TNSW also recommends that a covered canopy be provided between the main hospital entry and over the bus stop in order to encourage the use of public transport and provide weather protection.	This should not be adopted as the provision of a covered canopy in this location would be impractical. A covered canopy in this location would need to be approximately 4.2 metres in height in order to allow the trucks accessing the eastern part of the site to pass through this area. This would provide very little in the way of weather protection to pedestrians.
The provision of car parking spaces now, to meet the demand required at 2021 or beyond, is contradictory to the report's recommendation that public transport use be encouraged. Consideration should be given to staging the construction of additional parking spaces so as to not over supply in the short term.	Currently there is a shortage of parking supply within the campus while choice and frequency of public transport are limited. Nevertheless, improvements to encourage greater use of public transport would occur as part of future general public awareness and education. Refer Traffic and Parking submissions response report at **Appendix H.** In addition, the Statement of Commitments (refer **Section 3**) requires that during the operation of the development a Transport Management Plan be prepared which will investigate future opportunities to reduce car usage to and from the site.

2.5 Rural Fire Service

Table 4 provides the Proponent's responses to the issues raised by the Rural Fire Service in their submission.

Table 4. Rural Fire Service (RFS) submission

RFS Comment	Response
The RFS has concerns with the location of the proposed buildings. In this regard the new works are located closer to the bushfire threat to the west of the site than the existing building. This does not meet the intent for Special Fire Protection Purpose developments as identified in 'Planning for Bush Fire Protection 2006' (PBP). The RFS recommends the location of the new works are to comply with asset protection zone requirements as identified in Table A2.6 in PBP or alternatively, demonstration through fire behaviour modelling is required that demonstrates compliance with the intent of Section 4.2.5 of PBP or demonstration is required on the grounds the application should be considered under section 3.3 of PBP. The applicant is requested to submit further details demonstrating how the proposed building footprints and appropriate asset protection zones required by PBP can be achieved for the proposed expansion works.	This is addressed in detail in the Bushfire response to submissions report at **Appendix B**.
The applicant is requested to submit further details demonstrating how access complies with section 4.2.7 of 'Planning for Bush Fire Protection 2006'. In this regard, given the development type, the expansion of the existing car parking facility relies on only a singular access and egress point that is required to traverse the identified bush fire threat located to the west of the site.	Refer to the Bushfire response to submissions report at **Appendix B**. The building is classified as infill SFPP and in turn is to comply with s4.3.5 PBP2006 for access purposes and as outlined in the acceptable solutions compliance with s4.1.3 and s4.2.7 is to be achieved. The property access is within 200m of the public road and will only require one access point. As shown in Figures 6 and 7 in the Bushfire response to submissions report (**Appendix B)** the existing access has not been altered but actually improved in that the distance between the existing vegetation and the existing access is greater than currently available. It is noted that PBP2006 does not preclude a property access road to traverse 20-30m alongside a remnant section of bushland. The proposed access and evacuation locations will enhance the evacuation opportunities for the existing hospital building whilst complying the Planning for Bushfire Protection 2006.

2.6 NSW Roads and Maritime Services

Table 5 provides the Proponent's responses to the issues raised by the NSW Roads and Maritime Services in their submission.

Table 5. NSW Roads and Maritime Services (RMS) submission

RMS Comment	Response
RMS has undertaken a review of the exhibited Environmental Assessment and supports the proposed additional car parking capacity for the hospital and the provision of options to encourage alternative transport modes such as cycling and public transport.	Support noted.
It is noted that the Sidra analysis provided in the TTW report has considered the newly constructed Wrights Road-Oxley Highway roundabout as partially complete and has not considered the additional traffic introduced by the opening of the Oxley Highway upgrade project or the potential growth of future traffic volumes resulting from urban development in Thrumster and Sancrox areas to the west.	Refer TTW response to submissions report at **Appendix H**. An assessment of traffic modelling (SIDRA) for the intersection of Wrights Road and Oxley Highway will be carried out utilising the data provided by RMS and taking into consideration the new configuration of the roundabout (in comparison to TTW's initial SIDRA modelling where the roundabout at the intersection of Wrights Road and Oxley Highway had a different configuration). TTW will also include future projected data for the above roundabout as shown in a traffic report by RoadNet provided by RMS and traffic generation from the Hospital redevelopment.

RMS Comment	Response
	However, it should be noted that the level of traffic generation from the Hospital redevelopment is in order of some 200 vehicles per peak hour period (vph). Considering, the size and operation of the new roundabout at Oxley Highway and Wrights Road intersection, the level of additional vehicular trip generation from the Hospital redevelopment is very minimal and could easily be absorbed as part of the seasonal fluctuation of traffic volumes that could occur along the road system. The consideration of future development of the area as part of the Port Macquarie (land release areas) is normally the responsibility of the planning authorities such as the RMS. Prior to the significant investment into the construction of the roundabout and the road upgrade at this location, it would have been anticipated that its design would have allowed for assessing the operation of future developments including the Hospital. The Hospital redevelopment in the overall scheme would have a minimal impact on operation of the intersection. Hence, it would be unreasonable to undertake a full assessment just to include the Hospital when considering future development sites such as the Thrumster and Sancrox Urban Release areas which would have a far much greater impact on operation and functioning of the road system and the surrounding intersections.
RMS recommends that a secondary access connection to Lake Road, via Toorak Circuit, be investigated and that appropriate arrangements be undertaken to secure this option under the current proposal. In the absence of a secondary access the future potential for subsequent hospital redevelopments will be constrained and may require further costly upgrades of the Oxley Hwy- Wrights Rd roundabout, which will result in adverse impacts upon the state road during construction. This should be avoided where possible by effectively accommodating for future growth options under the current proposal.	A secondary access to the hospital campus, connecting to Lake Road via Toorak Circuit, is not required for the current proposal (refer amended Traffic and Parking Report at **Appendix E**). In addition, such a connection is not possible at the current time because the land is under separate ownership. It is understood that Council is currently in discussions with the owners of the relevant parcel of land with a view to purchasing this property (or some other arrangement) that might be possible so that a second access road to the hospital could at a future time be achieved.

2.7 Public submission

Table 6 provides the Proponent's responses to the issues raised in the anonymous public submission.

Table 6. Anonymous public submission

Comment	Response
Reference/consideration is made of PMHC DCP 2011 in regards to Koala Habitat, but fails to address the particular provisions in regard to hollow-bearing trees. While the report states that no hollow-bearing trees were confirmed to occur on site, it states "*it is **likely** that small hollows (5- 10cm in diameter) may be present in the upper branches of some of the larger eucalypts in the south eastern corner of the PMBH site*". The legal interpretation of '**likely**' means that hollows will occur, and hence be removed. This of concern given the Squirrel Glider has been recorded in urban remnants interconnected to this vegetation as have several hollow-obligate Yangochiropteran bats, and that no adequate offset measure has been provided for the loss of these key habitat components. This has not been given due consideration in the 7 Part Test assessment, and due compliance to the DCP provisions is also required. Furthermore, the assessment has failed to undertake Elliot B trapping to determine if the site contains known habitat of the Squirrel Glider, despite loss of key habitat components and the issues of light spillage impacting habitat usage (eg. hollows exposed to light may be avoided) and enhanced predation risk in the remaining remnant. Inexplicably, this species is considered as a moderate potential occurrence, yet is not assessed in the 7 Part Tests despite loss of foraging habitat, impacts on connectivity, apparent loss of potential den hollows, and the aforementioned indirect impacts.	Refer to the Ecological response to submission report at **Appendix C**. No Squirrel Gliders (Petaurus *norfolcensis)* were recorded during the ecological surveys undertaken by ERM. A Sugar Glider (Petaurus *breviceps)* was recorded during the spotlighting surveys associated with the Koala Activity Assessment (ERM 2010) and a number of other sightings have also been recorded within the immediate environs of the PMBH (OEH 2012a). Records for the Squirrel Glider have also been identified within 0.5km of the PMBH although none were identified on the site itself. The Squirrel Glider is known to inhabit Blackbutt-Bloodwood forest with heath understorey in coastal areas (OEH 2012b). This species requires abundant hollow-bearing trees and a mix of eucalypts, acacias and banksias (NPWS 1999a). Within a suitable vegetation community at least one flora species should flower heavily in winter and one or more of the eucalypts should be smooth-barked (NPWS 1999a). Despite the absence of heath understorey, smooth-barked eucalypt species and banksia species; the habitat assessment identified a moderate likelihood of potential habitat for this species within the road reserve of the Oxley Highway due to the availability of suitable hollows within this area and presence of acacia species in the understorey. However, trees within the proposed development footprint were considered to have a reduced likelihood of providing potential habitat due to a lack of suitable hollows and the absence of an understorey. Consequently, an Assessment of Significance (7-part test) was not

Comment	Response
	undertaken due to the low-moderate likelihood of the Squirrel Glider utilising or inhabiting vegetation within the proposed development footprint.
Similarly, the Varied Sittella is considered a low to moderate chance, but is not assessed despite loss of potential foraging and nesting habitat. The Little Lorikeet is also a low to moderate occurrence and is also not evaluated despite local records, and loss of suitable foraging and nesting habitat. Several other species are listed as potential occurrences in the road reserve but not assessed due to lack of direct impacts. This fails to consider indirect impacts such as light spillage on hollows from artificial lighting, and demonstrates failure to undertake due assessment as per the 7 Part Test guidelines which requires both consideration of all potentially occurring species in the study area impacted by direct and indirect impacts.	Refer to the Ecological response to submissions report at **Appendix C**. Both the Varied Sittella (Daphoenositta *chrysoptera)* and Little Lorikeet (Glossopsitta *pusilla)* were considered to have a low to moderate likelihood of occurrence within the Oxley Highway road reserve based on known habitat requirements. The Varied Sittella is known to inhabit eucalypt forests and woodlands (especially those containing rough-barked species and mature smooth-barked eucalypts with dead branches), mallee and Acacia woodland (OEH 2011a). The presence of decorticating bark, dead branches and standing dead trees are common features within the preferred habitat of this species as they provide habitat for arthropod species which comprise a large part of the Varied Sittella's diet (OEH 2011a). This species also prefers areas containing a shrub and ground cover layer and the presence of logs, fallen branches and leaf litter. Within the proposed development footprint, the likelihood for this species to occupy or utilise the area was further reduced due to the absence of an understorey and a lack of dead branches and fallen timber which is a result of the relatively young age of the planted eucalypts. This species is also adversely affected by the presence of Noisy Miners (Manorina *melanocephala)* which were observed within the grounds of the PMBH. The Little Lorikeet predominantly occurs in dry, open eucalypt forests and woodlands where they feed primarily on profusely flowering eucalypts although also on a variety of other species including melaleucas and mistletoes. Despite the presence of hollows within the Oxley Highway road reserve, this area was considered to have a low to moderate likelihood of providing habitat suitable for the Little Lorikeet due to its classification as moist sclerophyll forest rather than dry forest, which is the preferred habitat. Furthermore, no visible hollows were identified within the proposed footprint which further reduces the likelihood for this species to occupy or utilise the development area. A 7-part test was not undertaken for either of these species as there was only a low to moderate likelihood of their occurrence within the project footprint.
The assessment of significance of impacts on the Koala is inadequate and demonstrates failure to comprehend the fundamentals of Koala ecology. The report records SAT levels of 23-40% (medium to high), high levels of scratching on most trees, sightings of two Koalas (a male and female) during the survey , plus an earlier sighting of an adult with a juvenile (ie female with a joey) on site. These findings are clearly indicative of Core Koala Habitat, and residential Koalas. While it is acknowledged that SEPP 44 does not legally apply to Part 3A proposals and hence a site KPoM is not required, the loss of such high use habitat clearly conflicts with the objectives of SEPP 44 and the NSW Koala Recovery Plan, as well as the guidelines of the Australian Koala Foundation for sustainable development in Koala habitat. The only ameliorative measures offered are to replant browse species at 'another site' and to check for Koalas in trees prior to clearing.	As stated in the Ecological Assessment (ERM 2012), results indicate that the PMBH grounds and surrounding vegetation support a resident population of Koala (*Phascolarctos cinereus*) with high activity recorded throughout the area, including sighting of an adult and juvenile that would indicate a viable population. The proposal would result in the removal of approximately 83 eucalypt trees (comprising 62 planted eucalypt trees and 21 mature remnant trees), many of which are currently utilised as a foraging and sheltering resource for a viable local Koala population. Consequently, it is considered that the proposal would result in a significant loss of foraging habitat for this species although given the availability of alternative foraging resources in the local area (e.g. Lake Innes Nature Reserve), is not expected to have a significant impact on the life cycle of the Koala to the extent that it would be placed at risk of extinction. Lake Innes Nature Reserve is located approximately 0.5km to the east and south east of the PMBH site and is important to the local Koala population. The reserve supports a healthy population of approximately 600 Koalas and forms an important corridor linking the Port Macquarie area to the large area of State Forest to the west and ultimately, the Great Dividing Range. A review of aerial photographs indicates that landscaping and retained trees within the PMBH grounds and remnant vegetation in the adjoining Oxley Highway road reserve and along the southern boundary of the site are connected through a series of narrow

Comment	Response
	corridors to the Lake Innes Nature Reserve in the south east. The removal of planted and retained eucalypts as a result of the proposal is not expected to break this link or isolate areas of habitat although it is considered likely that the removal of remnant eucalypts in the south western corner of the PMBH site may reduce connectivity to some extent. Further requirements have been added to the Statement of Commitment section on the Construction Management Plan, requiring that koala management measures are also addressed throughout the construction phase. Refer **Section 3**.
Furthermore, the replacement ratio of 2:1 is not comparable to accepted replacement ratios for individual KPoMs, Comprehensive KPoMs or other planning instruments in the region (eg Biodiversity Strategies in the Coffs , Byron and Clarence LGAs). A more acceptable ratio would be at least 5:1 or higher, as demonstrated by offsets in the UIA 13 KPoM prepared by Australian renowned Koala expert, Dr Stephen Phillips.	Due to limited land available within the PMBH site, an appropriate off-site location needs to be identified to accommodate compensatory planting that cannot be located within the confines of the PMBH site. Initial discussions with Council indicate that suitable land will be difficult to secure for the project in the Council area. Nonetheless, investigations for a suitable compensatory planting site have commenced. The Proponent is planning to undertake a Biobanking assessment of the project to assess the number and type of credits that would be required to offset the impact of the project using the Biobanking Offsets Scheme managed by the NSW Office of Environment and Heritage (OEH). This approach has the support of OEH and the Council, as indicated during phone calls in late April 2012. The BioBanking Assessment report will be presented to the Department of Planning and Infrastructure once complete (required by Statement of Commitments, refer **Section 3**) in order to progress with the compensatory planting and offset component of the project. Refer to the Ecological response to submissions report at **Appendix C.**

3 Revised Draft Statement of Commitments

The Director General's Requirements include a requirement to provide a draft Statement of Commitments detailing measures for environmental management, mitigation measures and ongoing monitoring for the project. This section of the report outlines the commitments made by the Proponent to manage the site and the development and mitigate the on-going impacts of the development. These are to be implemented as part of the conditions of development consent.

Following the exhibition of the Environmental Assessment, and receipt of submissions, the draft Statement of Commitments has been revised to include additional environmental management and mitigation measures.

3.1 Geotechnical and contamination

The recommendations of the Geotechnical Investigation and Preliminary Contamination Assessment (dated November 2011) are to be adopted.

3.2 Bushfire protection

The proposed development is to adopt the recommendations of the Bushfire Threat Assessment Report prepared by BCA Check Pty Ltd (dated February 2012).

3.3 Aboriginal cultural heritage

If any Aboriginal archaeological relics are uncovered during the course of the work, then all work shall cease immediately in that area and the National Parks and Wildlife Service (NPWS) shall be contacted. The Proponent shall comply with any requirement made by NPWS to cease work for the purpose of archaeological recording.

3.4 Non-Aboriginal cultural heritage

If any archaeological relics are uncovered during the course of the work, then all work shall cease immediately in that area and the NSW Heritage Office shall be contacted. Depending on the possible significance of the relics, an archaeological assessment and excavation permit under the NSW Heritage Act 1977 may be required before further works can continue in that area. The Proponent shall comply with any requirement made by the NSW Heritage Office to cease work for the purpose of archaeological recording.

3.5 Arboricultural Method Statement

The Arboricultural Method Statement at Section 4 of the Arborist's Report (dated 19 December 2011) must be adopted.

3.6 Fire engineering

The proposed development is to adopt the Fire Engineering Strategy (dated 12 December 2011) and any updates to this required at detailed design stage.

3.7 Noise and vibration

The proposed development is to comply with the recommended construction and operational noise controls and the vibration controls under Section 7 of the Acoustic Assessment (dated 16 January 2012).

3.8 Ecological protection

To reduce the potential for ecological impact, the proposed development is to adopt the following ecological protection measures as recommended by the Ecological Assessment Report (dated January 2012):

(a) Minimise vegetation clearance to the development footprint through delineation of designated construction areas and access tracks to protect native vegetation located adjacent to areas of impact.

(b) Prior to and during removal of Koala feed trees, implement measures to avoid impacting on individuals including pre-clearance inspection of trees for Koalas.

(c) Ensure an ecologist is present during vegetation removal to relocate any identified fauna to a safe location, conduct post-clearing inspection of potential tree hollows and rescue any injured fauna.

(d) Implement erosion and sediment control measures in accordance with an Environmental Management Plan (EMP) to prevent sedimentation of surrounding vegetation.

(e) Control weeds in accordance with an EMP during and following construction to avoid the spread of weeds.

(f) Compensatory planting of Koala feed trees at a minimum ratio of 2:1 and in a suitable location. Due to limited space availability within the PMBH site, an appropriate off-site location will need to be identified to accommodate compensatory planting that cannot be located within the confines of the PMBH. A Biobanking Assessment report is to be prepared and submitted to the Department of Planning and Infrastructure prior to issue of a Construction Certificate.

3.9 Demolition management plan

Demolition will be undertaken in accordance with the requirements of the relevant Australian Standard AS2601-2001. The demolition of structures is to be incorporated into the Occupational Health and Safety Act 2000 administered by Work Cover NSW.

A Hazardous Materials Management Plan will be prepared prior to demolition commencing.

The proponent commits to preparing a demolition management plan prior

to the commencement of any demolition works on site. The demolition is to include measures to manage the following potential impacts:

- Demolition vehicle movements;
- Dust;
- Noise;
- Demolition waste including hazardous wastes.

Site erosion and sediment control in accordance with "Managing Urban Stormwater (EPA, NSW) and Soil and Erosion Control (The Institution of Engineers Australia).

3.10 Water main connection

Prior to issue of a Construction Certificate, documentation will be prepared on behalf of Health Infrastructure and submitted to Council for formal approval of a new water main connection for the hospital potable water. The new connection will be to the existing 300mm main located on the western boundary of the Port Macquarie Hospital site.

3.11 Construction management plan

The proponent commits to preparing a construction management plan prior to the commencement of any construction works on site. The plan will include:

- Construction hours;
- Air Quality/dust control procedures;
- Noise Management procedures;
- Construction vehicle movements and construction staff parking;
- Waste Management Plan;
- Community safety plan;
- Arrangements for temporary pedestrian and vehicle access;
- Koala management measures including:
  - minimise vegetation clearance through delineation of designated construction areas and access tracks to protect native vegetation located adjacent to areas of impact;
  - prior to and during removal of Koala feed trees, implement measures to avoid impacting on individuals including pre-clearance inspection of trees for Koalas;
  - ensure an ecologist is present during the removal of trees to conduct post-clearing inspections of trees and rescue injured fauna if required;
  - install signage notifying personnel of Koalas in the area to warn against potential injury via cars or machinery; and
  - brief all personnel about the presence of Koalas and the potential impacts prior to the commencement of work.
- Storage and handling of materials;

- Environmental training and awareness;
- Contact and complaints handling procedures; and
- Emergency preparedness and response.

3.12 BCA compliance

All works shall comply with the relevant sections of the Building Code of Australia (BCA).

3.13 Transport Management Plan

Prior to Occupation Certificate, a Transport Management Plan will be prepared which will investigate future opportunities to reduce car usage to and from the site. This may include, but not necessarily be limited to:

- Provision of incentive schemes for hospital staff – for example subsidised bus tickets;
- Promotion amongst staff of the merits of walking and bicycle riding, particularly relevant for any staff that may live near the hospital;
- Discussions with local bus agencies for provision of more frequent bus services with faster and more direct destinations. For example, a shuttle bus between the Port Macquarie Town Centre and the Hospital;
- Establishment of a waiting list for parking space for new hospital staff. Therefore new staff will not have a space until one becomes available;
- Discussions with the local authority (Port Macquarie Hastings Council) on the possibility to improve pedestrian and cycle path connections to and from the site.
- Opportunity for bicycle parking and storage facilities.

3.14 NSW Health Infrastructure Technical Standard TS11

As part of sustainable measures for the design documentation, delivery and performance of service engineering systems the development shall comply with NSW Health Infrastructure TS11 Technical Standards.

4 Conclusion

The proposed Port Macquarie Base Hospital Expansion seeks consent for the addition of a 2 – 3 storey (plus plant level) building to the existing main hospital, located in the form of a large fourth clinical 'pod' and which accommodates the following:

- 30 bed Acute Medical Services Unit;
- 24 bed Critical Care Centre comprising 16 bed ICU and 8 bed Coronary Care;
- 15 bed Paediatric Inpatient unit;
- Peri-operative unit with 32 pre and post operative beds;
- 7 new operating theatres;
- 2 new procedure rooms;
- Area provision for a future 8th theatre (fit out as storage space until required);
- Cardiac Catheter Suite;
- Expanded Emergency Department with 26 treatment spaces (previously 14);
- Clinical Services Sterilisation Department;
- Storage;
- Support services;
- 12 bed Surgical Unit extension as refurbishment to existing ward; and
- Fitout of existing Emergency Department as an Emergency Medical Unit / Emergency Community Care Centre (8 bays).

The Project Application has been prepared in accordance with Part 3A of the Environmental Planning and Assessment Act 1979, the Director General's Environmental Assessment Requirements.

Exhibition of the Environmental Assessment resulted in one public submission, a submission from Port Macquarie-Hastings Council as well as submissions from State Government agencies. These were forwarded to the Proponent. This report has provided a response to the key issues raised in the submissions and revisions to the Draft Statement of Commitments have been made to introduce additional environmental mitigation measures.

Accordingly, it is recommended that the Department of Planning and Infrastructure approve the Project Application subject to the revised draft Statement of Commitments.