



Wagga Wagga Base Hospital Redevelopment Stage 3

*State Significant
Development Assessment
(SSD 9033)*



December 2018

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Glossary

Abbreviation	Definition
AHD	Australian Height Datum
BCA	Building Code of Australia
CIV	Capital Investment Value
Consent	Development Consent
Council	Wagga City Council
Department	Department of Planning and Environment
DPI	Department of Primary industries
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
LHD	Local Health District
Minister	Minister for Planning
MHS	Mudgee Health Service
OEH	Office of Environment and Heritage
RMS	Roads and Maritime Services
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning and Environment
SEPP	State Environmental Planning Policy
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
WWBH	Wagga Wagga Base Hospital
WWLEP	Wagga Wagga Local Environmental Plan 2010



Executive Summary

This report provides an assessment of a State significant development (SSD) application, lodged by NSW Health Infrastructure (the Applicant), for the redevelopment of Wagga Wagga Base Hospital Redevelopment Stage 3 (SSD 9033). The site is known as the Wagga Wagga Base Hospital (WWBH) and is located at the corner of Edward and Docker Street, Wagga Wagga.

This site is comprised of four land parcels described as Lot 334 in DP 1190643 and is within the Wagga Wagga local government area (LGA).

The proposal seeks approval for the demolition of redundant buildings and construction of a six storey Ambulatory Care Building (ACB), including a rooftop plant room, above a 40-space basement parking level. The proposal also includes at-grade car parking for an additional 60 vehicles across the campus, ground level and bridge connections to the existing hospital building at Level 1 and Level 4, landscaping, signage and associated public domain works. The development will provide an additional 94 beds and provide updated facilities for a growing and ageing population.

The proposal has a capital investment value (CIV) of approximately \$111 million and would generate up to 320 construction jobs and 152 operational jobs. The development is SSD under clause 14 of Schedule 1 to the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), as it involves development for the purpose of a hospital that has a CIV of more than \$30 million. Therefore, the Minister for Planning is the consent authority.

The proposal was publicly exhibited between 19 July until 15 August 2018. The Department of Planning and Environment (the Department) received a total of nine submissions during the exhibition of the proposal, including seven submissions from public authorities, including Council, and two submissions from the public. The two public submissions received each provided commentary on the facilities to be provided within the hospital and requested the incorporation of a hydrotherapy pool and cycle centre. An additional three submissions were received from public authorities in response to the Applicant's Response to Submissions (RtS). Issues raised in the submissions relate to built form and landscaping, traffic and parking, noise and environmental amenity.

The Department has considered the merits of the proposal in accordance with the relevant matters under section 4.15(1), the objects of the *Environmental Planning and Assessment Act 1979*, the principles of Ecologically Sustainable development and issues raised in all submissions, as well as the Applicant's response to these.

The Department has assessed the merits of the proposal and found the key issues include: built form and urban design; traffic and parking impacts; noise and vibration impacts; and amenity for adjoining residential occupiers. The Department's assessment concludes that the proposal is suitable for the site, would not result in significant adverse environment or amenity impacts and would be generally compatible with the scale and form of the surrounding development. The Department has considered concerns raised in agency and Council submissions and recommended conditions of consent requiring further mitigation and management measures. In particular, the Department has recommended conditions requiring upgrades to key intersections in close proximity to the site. Subject to the recommended conditions, the Department is satisfied the proposed redevelopment of Wagga Wagga Hospital can be appropriately managed.

The Department is satisfied that the subject site is suitable for the proposal and that it is in the public interest and recommends that the application be approved subject to conditions.



Contents

Glossary	ii
Executive Summary	iii
1. Introduction	1
1.1 Site description	1
1.2 Surrounding development	2
2. Project	4
3. Strategic Context	10
4. Statutory Context	11
4.1 State Significant Development	11
4.2 Permissibility	11
4.3 Other Approvals	11
4.4 Mandatory Matters for Consideration	11
4.4.1 Environmental Planning Instruments	11
4.4.2 Objectives of the EP&A Act	12
4.5 Ecologically Sustainable Development	14
4.6 Environmental Planning and Assessment Regulation 2000	14
4.7 Planning Secretary's Environmental Assessment Requirements	14
4.8 Section 4.15(1) matters for consideration	15
4.9 Biodiversity Conservation Act 2016	15
5. Engagement	16
5.1 Department's Engagement	16
5.2 Summary of Submissions	16
5.3 Public Authority submissions	16
5.4 Public submissions	18
5.5 Response to Submissions and supplementary information	18
6. Assessment	20
6.1 Built Form and Open Space	20
6.2 Traffic and Parking	24
6.3 Noise	28
6.4 Amenity	31
6.5 Other issues	32

7. Evaluation 35
8. Recommendation 36
9. Determination 37
Appendices 38

Appendix A - List of Documents

Appendix B - Statutory Considerations

Appendix C - Recommended Instrument of Consent/Approval



1. Introduction

This report provides an assessment of a State significant development (SSD) application for the redevelopment of Wagga Wagga Base Hospital (WWBH) at corner of Edward and Docker Street, Wagga Wagga (SSD 9033).

The proposal seeks approval for several elements, including facilities for:

- a six storey Ambulatory Care Building (ACB), including a rooftop plant room, above a 40-space basement parking level, containing:
 - aged care.
 - rehabilitation.
 - older person's mental health care.
 - renal dialysis unit.
 - ambulatory clinics.
 - rehabilitation and Allied Health.
 - extended hours services.
 - Office accommodation.
 - a new public entry atrium.
- at-grade car parking for an additional 60 vehicles across the hospital campus.
- ground level and bridge connections to the existing hospital building at Level 1 and Level 4.
- site landscaping.
- removal of 11 demountable buildings.
- signage.
- associated public domain works and building services.

The application has been lodged by NSW Health Infrastructure (the Applicant).

1.1 Site description

The WWBH is approximately 1km south-west of the Wagga Wagga CBD. Wagga Wagga itself is a major regional city in the Riverina region of New South Wales (NSW) with a population of approximately 55,000 people. Wagga Wagga is approximately a five hour drive south west of Sydney and two hours, 45 minutes west of Canberra. The WWBH is one of three primary medical facilities of the Murrumbidgee Local Health District (LHD), serving four centres of population: Albury, Deniliquin, Griffith and Wagga Wagga. The hospital services a population of over 250,000 people.

The site is located at corner of Edward and Docker Street in Wagga Wagga and is legally described as Lot 334 in DP 1190643. The site is within the Wagga Wagga local government area (LGA).

1.1.1 Existing site elements

WWBH is currently a 393 bed/chair/consulting room facility and provides a wide range of services across the campus including medical, surgical, critical care, maternity, paediatrics, rehabilitation, aged care, geriatric evaluation and management, mental health, procedural centre, angiography, emergency, renal unit and transit unit services. There are many diverse, old and ad-hoc buildings across the campus, many of which have numerous extensions.

In more recent years, the hospital has been redeveloped with a new Mental Health Building (approved under Stage 1) and Acute Services Building (approved under Stage 2) recently constructed. The Acute Services Building (ASB) rises to eight storeys with a helipad above providing regional access for helicopters. At grade car parking is generally dispersed across the campus with the larger car parks located to the north and northeast of the campus.

The WWBH is listed on the NSW Department of Health's Section 170 Register: "Wagga Wagga Base Hospital". The Old Hospital Building is listed in Wagga Wagga Local Environmental Plan 2010 (WWLEP) as an item of local heritage being "Wagga Wagga Base Hospital (c. 1960 Building)". Approval for the demolition of this building has been previously granted under Part 5 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

1.1.2 Access

The hospital campus can be accessed from all four surrounding roads of Edward Street, Docker Street, Brookong Avenue (emergency vehicle access only) and Murray Street. The primary public entry to WWBH is from Edward Street via Lewis Drive. Emergency vehicle access to the hospital is available directly from Docker Street, Rawson Lane and Lewis Drive. There are currently 11 car parking facilities located across the campus, named CP1 – CP11. In total, 491 parking spaces are provided at WWBH across CP1 – CP11.

A helipad provides aerial access from the rooftop of the Acute Services Building. The flight paths for that facility are 180 degrees apart and are oriented east/west, away from the proposed Stage 3 works.

1.2 Surrounding development

The land surrounding the campus is predominantly residential in nature. Further detail regarding the development surrounding the hospital is described below:

- to the immediate north of the site is Edward Street, which is also known as the Sturt Highway and is the primary road. Across Edward Street is a residential area comprising of predominantly single storey detached housing. Murrumbidgee Turf Club is approximately 1km to the north, and the Murrumbidgee River is approximately 1.8km to the north east.
- to the south, two blocks of low-density residential development separate the edge of the hospital campus from the Main South Railway Line that connects Sydney to Melbourne.
- to the east is generally low-density residential development. The CBD of Wagga Wagga is approximately 1km to the east of the site.
- to the west across Docker Street is primarily low-density residential development. Calvary Hospital, a private hospital specialising in surgery, maternity and rehabilitation is 300m to the west of the campus.



Figure 1 | Local Context (Source: EIS)



2. Project

Stage 3 of the WWBH redevelopment builds on two previous stages of the hospital's redevelopment:

- Stage 1: Mental Health – Completed in 2011 (MP 11_0087) – approval granted in 2012 was for a new three storey hospital building, landscaping, additional carparking, pedestrian links and entry and utilities.
- Stage 2: Acute Services Building – Completed in 2015 (SSD 5237) - approval granted in 2013 for a new eight storey acute services building and helipad, demolition of the existing Ward Block hospital building, new car parking and entry forecourt and landscaping.

This application relates to Stage 3 of the hospital's redevelopment, with the key components and features of the proposal provided in **Table 1** and shown in **Figures 2 to 7**.

Construction itself will occur while the hospital is operating. Therefore, the Applicant proposes to construct in a single stage with works expected to commence in 2018 and be completed in 2020.

Table 1 | Main Components of the Project

Aspect	Description
Project Summary	<p>This application seeks approval for the following development:</p> <ul style="list-style-type: none">• a six storey Ambulatory Care Building (ACB), including a rooftop plant room, above a 40-space basement carpark.• ground floor level ancillary retail space.• at-grade car parking for an additional 60 vehicles.• ground level and bridge connections to the existing hospital building at Level 1 and Level 4.• site landscaping.• removal of 11 demountable buildings.• signage.• associated public domain works and building services.
Demolition	<ul style="list-style-type: none">• Removal of 11 demountable buildings
Staging	<ul style="list-style-type: none">• The proposed location of the ACB has already been cleared of buildings and vegetation via a separate approval under Part of 5 of the EP&A Act and services redistributed throughout the subject site. As such, the development is proposed to proceed in a single stage with the demountables to be removed on completion of the ACB.
Built form	<ul style="list-style-type: none">• The proposed building height of the ACB is RL 211.47, or 28m, when measured from ground. This includes five habitable levels with the sixth comprising roof top plant.

Aspect	Description
	<ul style="list-style-type: none"> • Introduction of a new basement car park and modification of existing at-grade car parks across the site to provide additional parking.
Site area	<ul style="list-style-type: none"> • 4.461ha
Gross floor area (GFA)	<ul style="list-style-type: none"> • GFA of the ACB is 18,237sqm, which includes: <ul style="list-style-type: none"> ○ 4,002sqm Ground Floor ○ 3,338sqm Level 1 ○ 3,380sqm Level 2 ○ 3,313sqm Level 3 ○ 3,347sqm Level 4
Uses	<ul style="list-style-type: none"> • aged care. • rehabilitation. • older person's mental health care. • renal dialysis unit. • ambulatory clinics. • rehabilitation and Allied Health. • extended hours services. • office accommodation. • a new public entry atrium.
Access	<ul style="list-style-type: none"> • The hospital campus can be accessed from all four surrounding roads of Edward Street, Docker Street, Brookong Avenue (emergency vehicle access only) and Murray Street. The primary public entry to WWBH is from Edward Street via Lewis Drive. Emergency vehicles access the hospital is available directly from Docker Street, Rawson Lane and Lewis Drive.
Car parking	<ul style="list-style-type: none"> • Additional 100 spaces
Bicycle parking	<ul style="list-style-type: none"> • 6 bicycle lockers and 4 bike racks in the undercroft and 18 bike racks south of the Stage 3 building (28 overall) are proposed
Public domain and landscaping	<ul style="list-style-type: none"> • Site landscaping including 2 pocket parks, 2 courtyards, 1 covered space and 1 level change landscape.
Hours of operation	<ul style="list-style-type: none"> • 24 hours 7 days a week
Construction hours	<ul style="list-style-type: none"> • 7am - 6pm Monday-Friday. • 7.30am - 5pm Saturday. • No work on Sundays or public holidays.
Signage	<ul style="list-style-type: none"> • Signage zone - 10.6m x 2.8m

Aspect	Description
Jobs	<ul style="list-style-type: none"> • 320 construction workers • 152 additional operational jobs
CIV	<ul style="list-style-type: none"> • \$111,000,000

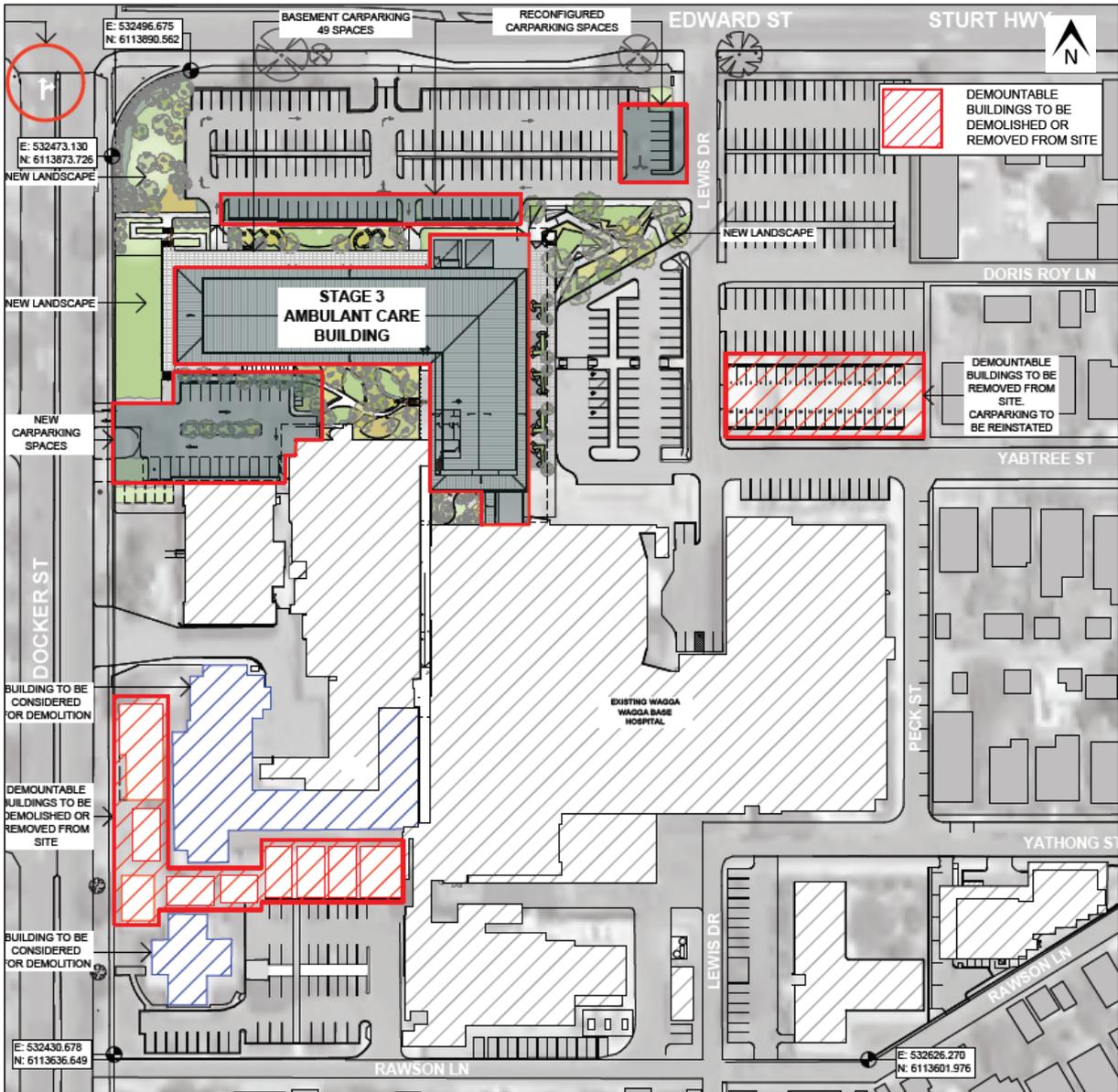


Figure 2 | Stage 3 Site Plan and Demolition Plan (Source: EIS)

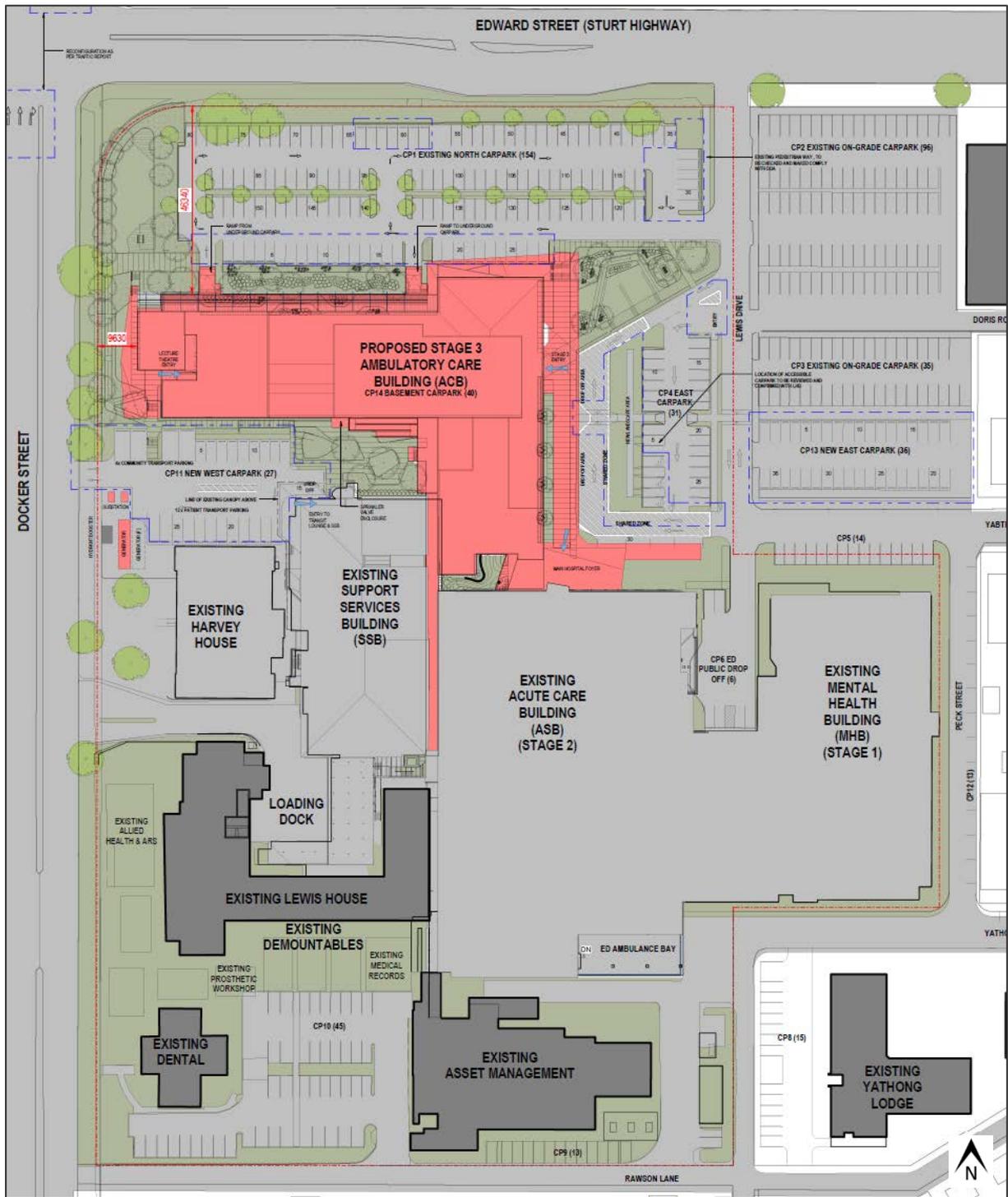


Figure 3 | Stage 3 Site Plan (Source: RtS)



Figure 4 | North Elevation (Source: RtS)



Figure 5 | East Elevation (Source: RtS)

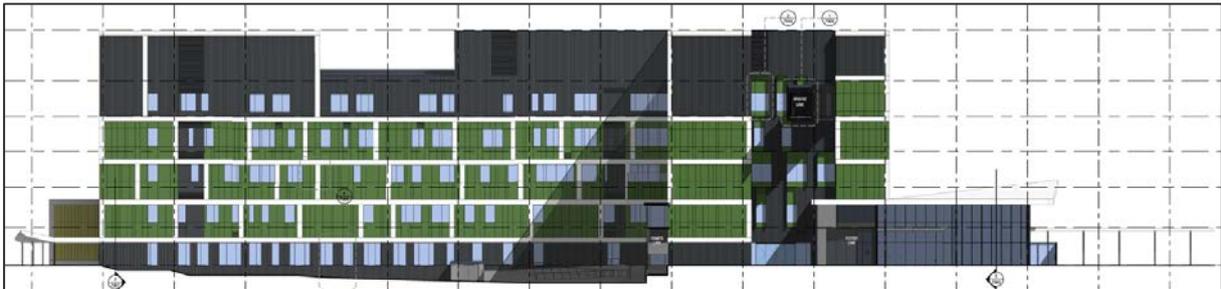


Figure 6 | South Elevation (Source: RtS)



Figure 7 | West Elevation (Source: RtS)



3. Strategic Context

Studies undertaken over the last decade specifically in relation to the functional and strategic capacity of WWBH identified the need for the hospital to maintain and expand its current service provision through the construction of new facilities. In particular, the projected growth rate in population of those aged 75+ in Wagga Wagga is 52.5 per cent by 2036, which is far higher than the overall rate for the Murrumbidgee Local Health District (10.7 per cent). This will contribute to a significant growth in demand for non-acute inpatient, ambulatory and community services.

Non-acute inpatient, ambulatory and community health services are currently provided from dispersed locations across and outside the WWBH campus. These facilities are not purpose built for their current use and are at or beyond their useful life.

If the proposal were to not occur, the existing infrastructure at WWBH and elsewhere in the region would not be able to adequately provide services for the anticipated increased demand for non-acute inpatient, ambulatory and community services.

The Department considers that the proposal is appropriate for the site given:

- the completed hospital will have 94 new beds additional to the current capacity.
- it is consistent with the State Infrastructure Strategy 2018-2038 as it represents direct investment in the improvement of health infrastructure.
- it is consistent with the Riverina Murray Regional Plan and the growth sector priority it puts forward. The proposal itself will provide new services and create 152 operational jobs.
- it is strategically justifiable given that in the absence of the redevelopment would place pressure on the ability of the hospital to provide efficient health care to the region.
- it would provide direct investment in the region of approximately \$111 million, which would support 240 construction jobs (along with the operational jobs noted above).



4. Statutory Context

4.1 State Significant Development

The proposal is SSD under section 4.36 (development declared SSD) of the EP&A Act as the development has a CIV in excess of \$30 million (\$111 million) and is for the purpose of a hospital under clause 14(a) of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

The Minister is the consent authority under section 4.5 of the EP&A Act.

In accordance with the Minister for Planning's delegation to determine SSD applications, signed on 11 October 2017, the Delegate may determine this application as:

- the relevant local Council has not made an objection.
- a political disclosure statement has not been made.
- there are less than 25 public submissions in the nature of objections.

4.2 Permissibility

The site is zoned SP2 Infrastructure under the WWLEP. The proposal is consistent with the objectives of the zone as it would deliver health infrastructure services and related uses to the community. Health services facility, which includes hospital, is a permissible development with consent. Therefore, the Minister for Planning or a delegate may determine the carrying out of the development.

4.3 Other Approvals

Under Section 4.41 of the EP&A Act, a number of other approvals are integrated into the State significant development approval process, and consequently are not required to be separately obtained for the proposal.

Under Section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any development consent for the proposal (e.g. approvals for any works under the *Roads Act 1993*).

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent (see **Appendix C**).

4.4 Mandatory Matters for Consideration

4.4.1 Environmental Planning Instruments

Under section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument that is of relevance to the development the subject of the development application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs that substantially govern the project and that have been taken into account in the assessment of the project. The following EPIs apply to the site:

- State Environmental Planning Policy (State & Regional Development) 2011 (SRP SEPP);
- State Environmental Planning Policy (Infrastructure) 2007 (ISEPP);
- State Environmental Planning Policy No.33 – Hazardous and Offensive Development (SEPP 33);
- State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55);

- State Environmental Planning Policy No.64 – Advertising and Signage (SEPP 64); and
- Wagga Wagga Local Environmental Plan 2010 (WWLEP).

The Department has undertaken a detailed assessment of these EPIs in **Appendix B** and is satisfied the application is consistent with the requirements of the environmental planning instruments (EPIs).

4.4.2 Objectives of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent/approval) are to be understood as powers to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at **Table 2**.

Table 2 | Response to the objects of section 1.3 of the EP&A Act

Objects of the EP&A Act	Consideration
<p>(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State’s natural and other resources,</p>	<p>The proposal forms part of the Wagga Wagga Rural Referral Hospital Redevelopment program for the delivery of improved healthcare and associated services in Wagga Wagga and Murrumbidgee region. Two previous stages of the hospital redevelopment include Stage 1 Mental Health Facility and Stage 2 ASB, completed in 2011 and 2015 respectively.</p> <p>The proposal would demolish existing buildings and build a new six storey ambulatory care building and associated services, landscaping, signage to maximise capacity, support a higher scope of clinical care and provide a broader range of healthcare services to better meet the current and future needs of the community.</p>
<p>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</p>	<p>The proposal considers the proposed development against the principles of ecologically sustainable development (ESD) set out in the Environmental Planning and Assessment Regulation 2000 (the Regulation). More details are provided under Section 4.5.</p>
<p>(c) to promote the orderly and economic use and development of land,</p>	<p>The proposal to invest \$111 M in public health and related services would meet the objectives of the zone to provide health infrastructure services. The redevelopment of the existing hospital campus to improve capacity would be of economic benefit through job creation and infrastructure investment.</p>

(d) to promote the delivery and maintenance of affordable housing,	The proposal is for a hospital redevelopment and does not include the provision of affordable rental housing.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposal will not involve clearing any native vegetation or natural habitats, or habitat of any importance to native plants or animals.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	<p>The Wagga Wagga Heritage Conservation Area is located within the vicinity of the site, being 50m to the east of the proposed car park and directly opposite the southern extremity of the hospital site on the southern side of Rawson Lane.</p> <p>The proposed works are primarily located in the north western corner of the site away from the southern boundary and the proposed eastern car park is separated from the conservation area by existing residential dwellings which will provide a visual buffer. The Heritage Impact Statement provides an assessment of potential impacts and concludes the proposal would not have any detrimental impacts on the nearby Conservation Area.</p> <p>Furthermore, there is no impact to suggest that any Aboriginal cultural heritage objects are present on site.</p> <p>If unforeseen Aboriginal objects are uncovered during development, work will be required to cease, and a heritage consultant and NSW Office of Environment and Heritage informed.</p>
(g) to promote good design and amenity of the built environment,	The proposal's design considered the impact of height, density, bulk and scale in the context of the existing site and surroundings.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The Department has considered the proposal and has recommended a number of conditions of consent to ensure the construction and maintenance is undertaken in accordance with legislation, guidelines, policies and procedures (refer to Appendix C).
(i) to promote the sharing of the responsibility for environmental planning and assessment	The proposal is SSD in accordance with the SRD SEPP. The Department has consulted with Council

between the different levels of government in the State,

and other relevant Government agencies and consideration of their responses.

- (j) to provide increased opportunity for community participation in environmental planning and assessment.

The Department publicly exhibited the proposal from 19 July 2018 to 15 August 2018. The exhibition methods include notifying adjoining landowners, placing a notice in newspapers and displaying the proposal on the Department's website and at Council during the exhibition period.

4.5 Ecologically Sustainable Development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle.
- inter-generational equity.
- conservation of biological diversity and ecological integrity.
- improved valuation, pricing and incentive mechanisms.

ESD initiatives and sustainability measures are proposed to be incorporated into the design, including:

- metering and monitoring systems for improved operational energy and water efficiency.
- reduced greenhouse gas emissions via energy efficiency initiatives such as LED lighting, variable speed fans, economy cycles on air-conditioning systems, high efficiency rated equipment, and energy metering.
- potable water savings through the use of 4 star rated fixtures and fittings.
- recycling and diversion from landfill of construction and demolition waste.
- redevelopment of existing project site which will have a minimised impact on the local ecosystem.

The site is not subject to any known effects of flooding and is not subject to bushfire risk. The site would not be impacted by changes in sea level resulting from climate change.

The Department has considered the proposed development in relation to the ESD principles. The inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the proposed development. The proposed development is consistent with ESD principles as described in Section 6.19 of the Applicant's EIS, which has been prepared in accordance with the requirements of Schedule 2 of the Regulation.

Overall, the proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives will encourage ESD, in accordance with the objectives of the EP&A Act.

4.6 Environmental Planning and Assessment Regulation 2000

Subject to any other references to compliance with the Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

4.7 Planning Secretary's Environmental Assessment Requirements

The EIS is compliant with the Planning Secretary's Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

4.8 Section 4.15(1) matters for consideration

Table 3 identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided for in **Section 6** (Assessment) and relevant appendices or other sections of this report and EIS, referenced in the table.

Table 3 | Section 4.15(1) Matters for Consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Consideration of all relevant SEPPs and the WWLEP is undertaken in Section 6.1 of the EIS. The proposal is consistent with all relevant provisions. The Department's consideration of the relevant EPIs is provided in Appendix B of this report.
(a)(ii) any proposed instrument	Not applicable.
(a)(iii) any development control plan (DCP)	Under clause 11 of the SRD SEPP, DCPs do not apply to SSD. Notwithstanding, consideration has been given to relevant DCPs at Appendix B .
(a)(iii)a) any planning agreement	Not applicable.
(a)(iv) the regulations <i>Refer Division 8 of the EP&A Regulation</i>	The application satisfactorily meets the relevant requirements of the Regulation, including the procedures relating to applications (Part 6 of the Regulation), public participation procedures for SSD and Schedule 2 of the Regulation relating to EIS.
(b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	Appropriately mitigated or conditioned - refer to Section 6 of this report.
(c) the suitability of the site for the development	The site is suitable for the development as discussed in Sections 3, 4 and 6 of this report.
(d) any submissions	Consideration has been given to the submissions received during the exhibition period. See Sections 4 and 5 of this report.
(e) the public interest	Refer to Section 5 of this report.

4.9 Biodiversity Conservation Act 2016

Under section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act), SSD applications are "to be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values".

A BDAR was provided as part of the EIS, which concluded that the proposal is not likely to have a significant impact on biodiversity values. Furthermore, the proposal does not require any offsets under the Biodiversity Assessment Method (BAM), and thus no ecosystem credits or species credits are required. The Office of Environment and Heritage supported these findings in its comments on the EIS (see **Section 5.3** of this report).



5. Engagement

5.1 Department's Engagement

In accordance with Schedule 1 of the EP&A Act, the Department publicly exhibited the application between 19 July until 15 August 2018 (28 days). The application was exhibited at the Department and on its website, at the NSW Service Centre and at Wagga City Council's office.

The Department placed a public exhibition notice in the Wagga Wagga Riverina Leader on 18 July 2018 and notified adjoining landholders and relevant State and local government authorities in writing. The Department representatives visited the site to provide an informed assessment of the development.

The Department has considered the comments raised in the public authority and public submissions during the assessment of the application (**Section 6**) and/or by way of recommended conditions in the instrument of consent at **Appendix C**.

5.2 Summary of Submissions

The Department received a total of nine submissions, comprising seven submissions from public authorities and two submissions from the general public (providing comments). A summary of the issues raised in the submissions is provided in **Table 4**.

5.3 Public Authority submissions

A summary of the issues raised in the public authority submissions is provided at **Table 4** below.

Table 4 | Summary of public authority submissions to the EIS exhibition

Wagga City Council (Council)

Council did not object to the proposal, however, it provided the following comments:

- cumulative traffic impacts of overall hospital development on the existing traffic conditions should be considered.
- future intersection improvement works should be undertaken in consultation with RMS, Council, local bus operators and TfNSW, aim to achieve a level of service C operation in 2031.
- provision of on-site parking did not consider cumulative impact of the hospital operation.
- good access to green space should be incorporated in design and green spaces with severely limited solar access should be reconsidered.
- retail activities should be limited to those that are ancillary to the operation of the hospital.

Office of Environment and Heritage (OEH)

OEH did not object to the proposal, however, it provided the following comments:

- concur with the findings of the BDAR that no offsets are required for the proposed development.
- Aboriginal cultural heritage (ACH) assessment has not been updated with current AHIMS search results so is considered invalid.
- mitigation measures described in EIS relating to ACH are incomplete.

OEH also provided recommended conditions, should the application be supported.

Environment Protection Authority (EPA)

EPA did not object to the proposal, however, it provided the following comments:

- construction works proposed on Saturdays are beyond the standard construction hours recommended in the *Interim Construction Noise Guideline*.
- if the extended hours are approved, noisy works that are likely to exceed the noise affected target levels should be scheduled during periods when people are less likely to be impacted.

Roads and Maritime Services (RMS)

RMS did not object to the proposal, however, it provided the following comments:

- impacts of the cumulative development of the hospital will have a cumulative impact on intersection performance.
- proposed redevelopment of the site contributes to the traffic loading through the surrounding road network and that the proposed development will accelerate the need for works at the intersection to accommodate future traffic growth.
- consideration should be given to the downstream effects of any treatments on the road network or movements within the surrounding precinct, particularly when heading to the east towards the CBD from the site.
- the project should not be assessed as a single stage in isolation; it is the cumulative impact of the whole redevelopment and anticipated traffic generated by the finished hospital establishment that requires assessment.
- a wider impact on the surrounding road network within the precinct should be considered.
- on-site parking has been an issue for the current hospital facility and parking demands of the current hospital have overflowed into the surrounding residential area and road network.
- safe pedestrian access to the hospital site across Edward Street as a result of heavily dependent on on-street parking during construction should be addressed.
- a strategy should be developed for ease of pedestrian access and circulation in and around the site.
- the intersection of Edward Street/Murray Street should be required to be upgraded with consideration for both vehicular and pedestrian traffic, with consultation between the Applicant, RMS and Council.

RMS also provided recommended conditions, should the application be supported.

Transport for NSW (TfNSW)

TfNSW did not object to the proposal, however, it provided the following comments:

- further consultation with RMS is required to determine the appropriate mitigation and funding measures for Edward Street/Docker Street and Edward Street/Murray Street intersections.
- access to two bus stops in the vicinity of the hospital may be impacted by improvements to the Edward Street/Docker Street intersection, during construction and operation period.
- consult with the local bus operators and TfNSW regarding the intersection improvements is recommended.

TfNSW also provided recommended conditions, should the application be supported.

Riverina Water County Council (RWCC)

RWCC raised no issues with the proposed development and potential impacts on RWCC's water supply network. However, should the application be supported, RWCC require conditions be included in the consent for the lodgement of a formal application for water supply.

Airservices Australia

Airservices Australia had no issues with the proposed development regarding airspace procedures and communications/navigation/surveillance facilities.

5.4 Public submissions

Two public submissions were received, requesting the inclusion of a hydrotherapy pool for the public and a cycle centre for staff in the proposal.

The types of health services and facilities proposed with the development falls outside the scope of this application and is a matter for NSW Health.

5.5 Response to Submissions and supplementary information

Following the exhibition of the application the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised in the submissions.

On 10 October 2018, the Applicant provided a Response to Submissions (RtS) on the issues raised during the exhibition of the proposal. With the RtS, the Applicant provided the following:

- amended architectural plans.
- design statement for revised scheme.
- updated traffic report.
- art strategy.
- geotechnical report.
- preliminary soil assessment – old hospital building.
- preliminary soil assessment – Wagga Wagga rural referral hospital.
- landscape plans.

The RtS was made publicly available on the Department website and was referred to the relevant public authorities. An additional three submissions were received from public authorities, including Council, RMS, and TfNSW. A summary of the issues raised in the submissions is provided at **Table 5**.

Table 5 | Summary of public authority submissions to the RtS

Council

Council confirmed the RtS has addressed some aspects of its original submission. However, reiterated its comments regarding the following concerns:

- any upgrade works to intersections should include the Edward/Murray Street intersection and Brookong Avenue/Murray Street intersection.
- traffic impact does not consider the cumulative impact of the various stages of the hospital redevelopment.

-
- compliance with a DCP control as justification for the provision of car parking is too simplistic in this instance.
 - the proposal as amended in the RtS results in a reduction of proposed car parking from 107 to 100 spaces, despite Council's previous suggestions on opportunities to expand the provision of parking through minor design change.
 - while the landscape plans provide for better areas of open space, further improvements could be made.
 - the development consent should only allow ancillary retail activities on the hospital site.

RMS

RMS confirmed the RtS has addressed some aspects of its original submission. RMS detailed that, in an effort to further resolve the submissions from both RMS and Council, a workshop was convened by the Applicant to discuss traffic issues. RMS has reiterated and provided additional comments regarding the following concerns:

- ongoing workshop is required by three parties to develop the appropriate mitigation measures for the Edward Street/Murray Street and Edward Street/Docker Street intersections.
- the hospital should not be relying on on-street parking on surrounding streets to accommodate parking demands for the Stage 3 development.

In its previous submission RMS included suggested conditions. RMS requests that these be considered in addition to the commitments within the response to the RTS for inclusion as part of any consent issued.

TfNSW

TfNSW confirmed the RtS has addressed some aspects of its original submission, however, reiterated its comments regarding the impacts on public transport, in particular the impacts of intersection works on bus stops in the area. TfNSW requests that this is taken into consideration when preparing the future Construction Pedestrian Traffic Management Plan.



6. Assessment

The Department has considered the EIS, the issues raised in submissions and the Applicant's RtS in its assessment of the proposal. The Department considers the key issues associated with the proposal are:

- built form and open space.
- traffic and parking.
- noise.
- environmental amenity.

Each of these issues is discussed in the following sections of this report. Other issues were taken into consideration during the assessment of the application and are discussed at **Section 6.5**.

6.1 Built Form and Open Space

The proposal seeks approval for several elements, including a new six story ACB. The proposed height of the ACB is approximately 28m, when measured from ground level. This is lower than the existing Stage 2 ASB, which was built to a height of RL 220.745, or approximately 9m taller than the proposed ACB (**Figure 8**).



Figure 8 | North elevation with Stage 2 ASB in background (Source: EIS)

The applicant states that the architectural outcome was driven by the needs of the hospital occupants (both clinical and non-clinical). The focus was on creating a clear and legible access for patients, visitors and staff that enables easy and equitable movement.

A new double height atrium will become the main entry to the hospital. It extends along the length of the eastern façade and will connect the lobby of the ASB to the south. It adjoins the forecourt and drop-off area of the adjoining carpark.

Two large balconies are proposed at the northern elevation of the ACB at Level two and Level four. The balconies will act as 'courtyards' at these levels providing an outdoor space for patients and staff.

A retail space is proposed at the north-east corner of the ACB on Ground Level, which will have an elevated outlook to the north and east.

Green spaces are also proposed to provide the opportunity for people to congregate or to find solitude. The landscape scheme (**Figure 9**) has six distinctive elements, comprising:

- north-west pocket park – an enclosed intimate space where people can gather.
- northern “level change” landscape – stepped landscape zone.
- north-east pocket park – open grassed area with seating and larger trees for shading.
- eastern covered space - planting of trees to reference the building facade and timber seating.
- western Courtyard – an internal courtyard connecting the ACB and Stage 2 Building.
- spiritual Courtyard – an enclosed space to provide visual connection between Stage 3 and pastoral care building and featuring sensory landscape elements.

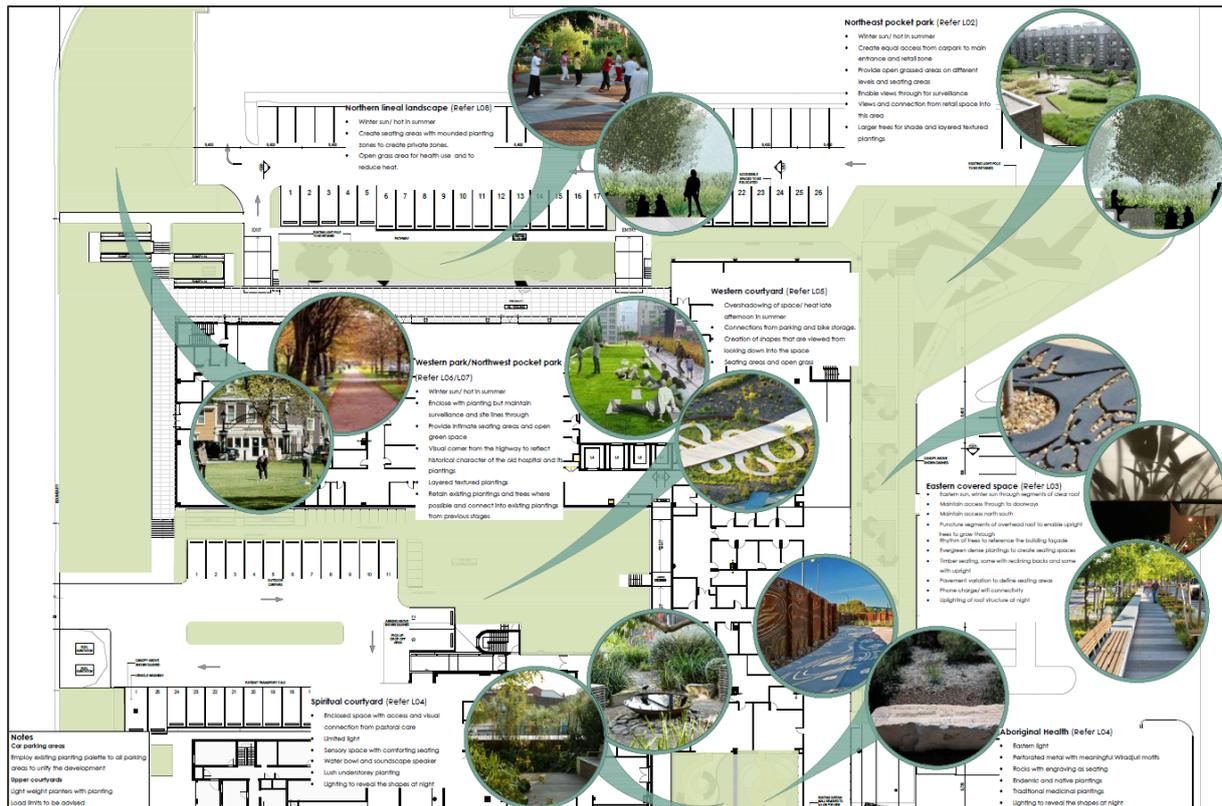


Figure 9 | EIS Landscape Concept (Source: EIS)

In response to the exhibition of the EIS, a submission was received from Council that supported maximising green space. It noted however that consideration should be given to pedestrian access and pathfinding to maximise the success of the spaces.

A revised design was provided with the RtS (**Figure 10** and **Figure 11**) which better connects the Ground Floor public areas of the proposed building, both internally and externally, and provides better access to green spaces. This includes doors in the glazed façade providing public access between the retail café and external seating areas and associated green space to the east, north and west.



Figure 10 | Revised Landscape Plan showing green spaces (Source: RtS)

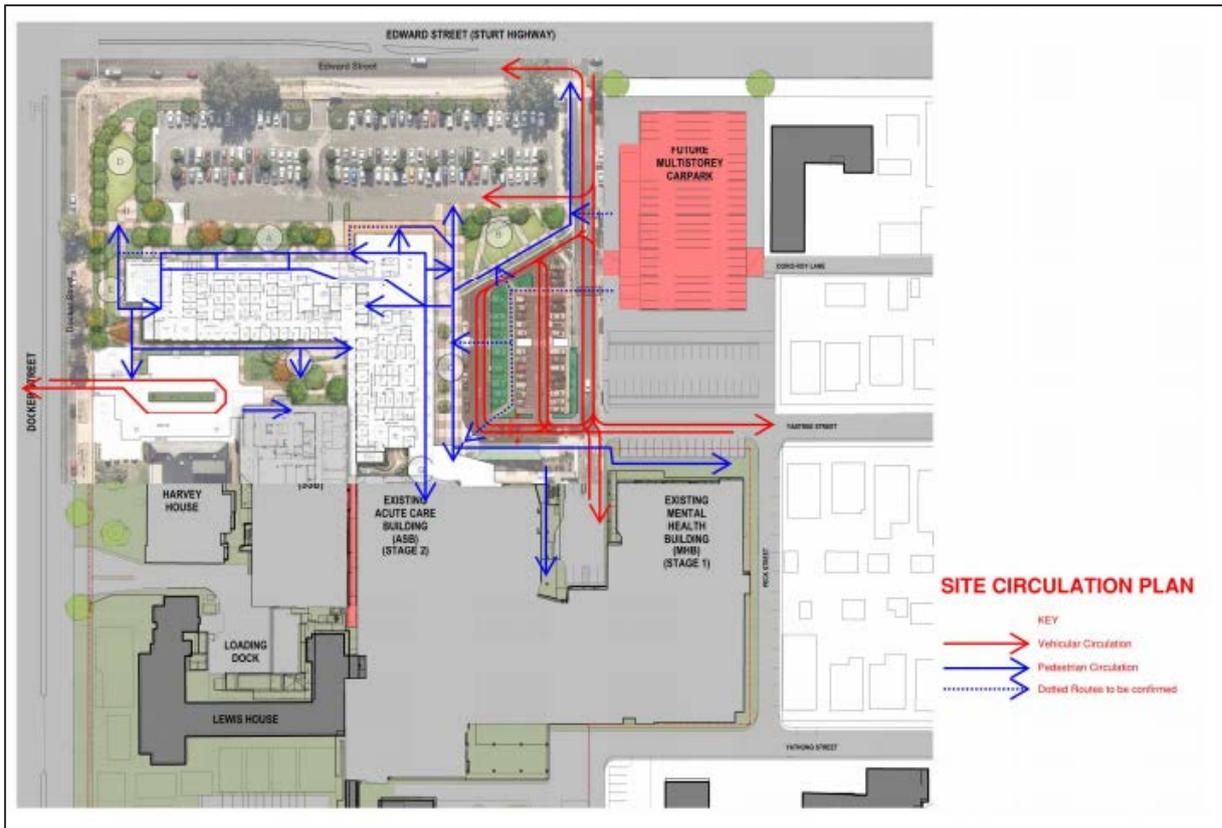


Figure 11 | Revised design with additional accessibility to green spaces (Source: RtS)

Council also commented with respect to the green space at the rear of the Stage 3 building would have severely limited solar access and asked if the Applicant could consider revising the design to move the green space to the northern side of the Harvey House building and relocate the patient transfer parking to the current green space

location. They also noted that many of the green spaces were in areas exposed to high levels of traffic (vehicle and pedestrian).

While acknowledging the issues, the Applicant noted that the main purpose of the green space to the south of the building is to provide an attractive natural outlook from the inpatient bedrooms on the levels above in both wings. This outlook would not be available if car parking were located in this courtyard. It should also be noted that relocating parking further from Docker Street would increase the area of roadway required to access that parking, thereby reducing green space.

With respect to green spaces affected by high volume traffic, the Applicant provided a revised landscape plan with the RtS with screening the green areas from the road with trees and vegetation.

Council also noted that the steps, ramps and walls in the design could be visually obtrusive and could contribute to crime and safety issues. The Applicant has responded that further design discussions are occurring that are considering a deck to the north of the retail café (providing a continuous external level pedestrian access). Further design phases will also take into account Crime Prevention Through Environmental Design.

The Government Architect NSW (GANSW) in their response to the EIS was broadly supportive of the built form and design. There were some comments raised regarding potential issues wayfinding, landscaping, façade treatment and possible vehicle/pedestrian movement conflicts.

In response, the Applicant provided an updated Design Statement in the RtS which considered the GANSW comments. The Applicant amended elements of the design such as:

- improving integration with the Stage 1 and Stage 2 buildings to provide a more unified architectural expression.
- reduction in the setback to Docker Street from 20m to 9.63m.
- simplifying wayfinding by better integrating the existing and proposed buildings.
- providing more internal space for the ground floor retail.
- adding new trees to the northern carpark for shading and general enhancement of the environment.
- improving the connection with outdoor spaces.
- a clearer hierarchy of entry points.
- clearer articulation of the façade design with a “white frame structure” on each wing and replacement of the brickwork finishes with aluminium cladding in shades of green and white (**Figure 12**).

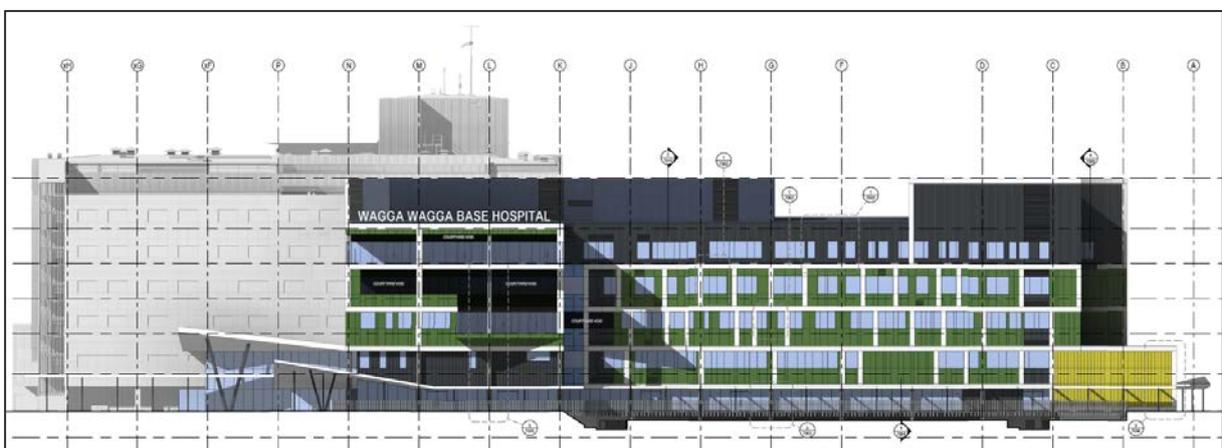


Figure 12 | Revised north elevation (Source: RtS)

GANSW generally supported the amendments, with some additional comments regarding the colour palette and engagement with the local community. In particular, GANSW reiterated their previous comments recommending the development of an art strategy for the development in consultation with local arts organisations and indigenous communities and encouraging the incorporation of the cladding system.

The Department considers that further engagement during the detailed design should be undertaken with local arts organisations and representatives from the local indigenous community to develop a meaningful art strategy for the development.

The Department acknowledges the work that has been undertaken to incorporate comments raised by agencies and Council in response to the EIS. The Department believes the issues raised have been adequately addressed in a manner that provides the foundation for completion of the detailed design. There is opportunity for further refinements, particularly around the art strategy in consultation with the local art community and the local indigenous community, and the incorporation of endemic tree species in the landscape design. On this basis, the Department recommends conditions of consent requiring the development and implementation of an art strategy prior to operation, and the inclusion of 60 trees of endemic species in the landscape design. Subject to these conditions, the built form of the development is considered appropriate in its context.

6.2 Traffic and Parking

6.2.1 Overview

The Applicant's Transport Impact Assessment (TIA) has considered the existing and likely future traffic conditions along the surrounding road network. It was prepared in consultation with Council, RMS and TfNSW.

SIDRA modelling was undertaken at key intersections surrounding the WWBH. The modelling showed that currently, the Edward Street/Docker Street intersection (southern and eastern legs) during the PM peak is operating at level of service (LOS) E. The Edward Street/Murray Street intersection (southern leg) during the AM and PM peak is operating at LOS F. Edward Street/Lewis Drive is operating at LOS A with significant spare capacity.

In its comments on the EIS, RMS detailed that assessment of the broader road network should be undertaken to support the proposed development. In response, the Applicant provided an updated TIA with the RtS. In the updated TIA, SIDRA modelling showed that the Edward Street/Murray Street intersection is operating at LOS F during both AM and PM peak. Edward Street/Brookong Avenue intersection is also operating at LOS F during both AM and PM peak. Edward Street/Docker Street intersection is operating at LOS C during AM peak and LOS E during PM peak (see **Figure 13**). Other intersections (Edward Street/Lewis Drive, Murray Street/Dorris Roy Lane, Docker Street/Hardy Avenue, Murray Street/Yabtree Street and Docker Street/Rawson Lane) are operating between LOS A and B with significant spare capacity.



Figure 13 | Intersection operation (Base source: Nearmap)

The WWBH main entrance is currently serviced by seven bus services - each service generally provides services every 40 minutes during the peak hours and hourly services outside of peak hours on weekdays and only limited number of services on weekends. The Wagga Wagga railway station is within 1km from the site on Railway Street. There is currently a bicycle storage area on site with 11 bicycle racks that can accommodate up to 16 bicycles for the use by staff.

In terms of current car parking spaces on site, there are 440 car spaces available. In addition, there is a total of 489 on-street parking spaces with 400m of the WWBH. The current occupancy rate for both on-site parking and on-street parking is estimated in the TIA to be approximately 86 per cent during the peak hour of 1:30pm.

6.2.2 Construction traffic

It is estimated that peak construction traffic will comprise eight heavy vehicles per day and up to 320 workers. The peak parking demand would be up to 320 vehicles. This will result in a total of 640 light vehicle movements and 16 heavy vehicle movements to and from the subject site.

All construction workers are expected to arrive before the AM peak and leave after the PM peak to minimise impact on the operation of the local traffic network. Workers will also be encouraged to car pool or use local bus services to travel to the site and minimise occupation of the 489 on-street parking spaces in vicinity of WWBH. The Applicant has also advised that an alternative location for the provision of parking for construction workers and heavy vehicles is under investigation with Council to minimise impacts on on-street parking.

The EIS notes that a Preliminary Construction Traffic Management Plan has been prepared to manage traffic activities during the construction stage. The Department agrees with TfNSW’s recommendation for the imposition of a condition requiring the Applicant to prepare a Construction Pedestrian Traffic Management Plan (CPTMP) prior to the commencement of any construction works. This management plan should include measures to manage any impacts to bus stops. As bus stops may still be impacted by intersection works (as discussed below), the CPTMP should specifically address access arrangements to bus stops.

To minimise traffic and parking impacts arising from construction, the Department recommends conditions of consent to be satisfied prior to commencement, including a requirement to provide sufficient parking for construction workers and heavy vehicles, whether on the subject site or at an alternate off-street location, and the provision of a CPTMP to be developed in consultation with Council. Subject to these conditions, the Department considers that any residual impacts resulting from the construction period can be appropriately managed.

6.2.3 Operational traffic

The proposed development will result in an additional 94 hospital beds and 152 additional full time equivalent staff. The TIA submitted with the EIS estimated an additional hourly peak of 76 vehicle movements in the AM peak and 92 vehicle movements during the PM peak hour when the hospital is operational. Additional car parking (100 spaces) is proposed as part of the development.

A number of major intersections are currently operating at LOS F (Edward Street/Docker Street south and east leg during PM peak; Edward Street/Murray Street south leg during AM and PM peak). Based on background traffic growth, these intersections will operate at LOS F with and without the Stage 3 hospital redevelopment project. Mitigation measures have been suggested in the TIA to improve traffic flow, including:

- Edward Street/Docker Street intersection:
 - convert existing 50m northbound left turn lane to a shared through and left-turn lane.
 - convert existing northbound shared through and right-turn lane to 60m northbound right-turn lane.
- Edward Street/Murray Street intersection:
 - signalise this intersection with two-phase operation and consider signal coordination with the Edward Street/Docker Street intersection.
- Edward Street/Brookong Avenue intersection:
 - right turn restriction out of this intersection onto Edward Street.

Council commented that the upgrades to Edward Street intersections at Docker Street, Murray Street and Brookong Avenue will have wider implications impacting on the local road network. Furthermore, the Applicant needs to consider a cumulative impact of the overall hospital development and its contribution to the baseline traffic conditions. TfNSW commented that further consultation with RMS is required to determine the appropriate mitigation and funding measures for Edward Street/Docker Street and Edward Street/Murray Street intersections, as well as potential impact to the two bus stops in the vicinity of the hospital, should improvement works be carried out at the Edward Street/Docker Street intersection. As a result, further consultation with the local bus operators and TfNSW regarding intersection improvements is recommended by TfNSW.

RMS submitted similar concerns in relation to traffic conditions at the above intersections, particularly impacts of the cumulative redevelopment of the hospital and that the hospital, as a significant traffic generator, will accelerate the need for works at the intersection to accommodate future traffic growth.

A traffic workshop was held with the Applicant, RMS and Council on 27 September 2018 (prior to the submission of the RtS), to discuss the Edward Street/Murray Street intersection improvement works. RMS and Council, during the workshop, commented it would be unlikely to approve the interim recommendation of installing left turn only arrangements at Edward Street/Murray Street and Edward Street/Brookong Street intersections.

The revised TIA submitted with the RtS attempted to respond to the agency concerns. Additional assessment was provided in the TIA of a wider surrounding road network. The Applicant further responded that the traffic generated from previous stages of the hospital development have already been assessed and included in the existing conditions. The following intersection mitigation measures are recommended in the revised TIA:

- Edward Street/Docker Street intersection (**Figure 14**):
 - convert existing 50m northbound left-turn lane to a shared through and left-turn lane.
 - convert existing northbound shared through and right-turn lane to right-turn lane.
 - convert existing southbound through lane to a shared through and right-turn lane.
 - convert existing southbound shared through and right-turn lane to right-turn lane.
 - convert existing southbound left-turn lane to a shared through and left-turn lane.

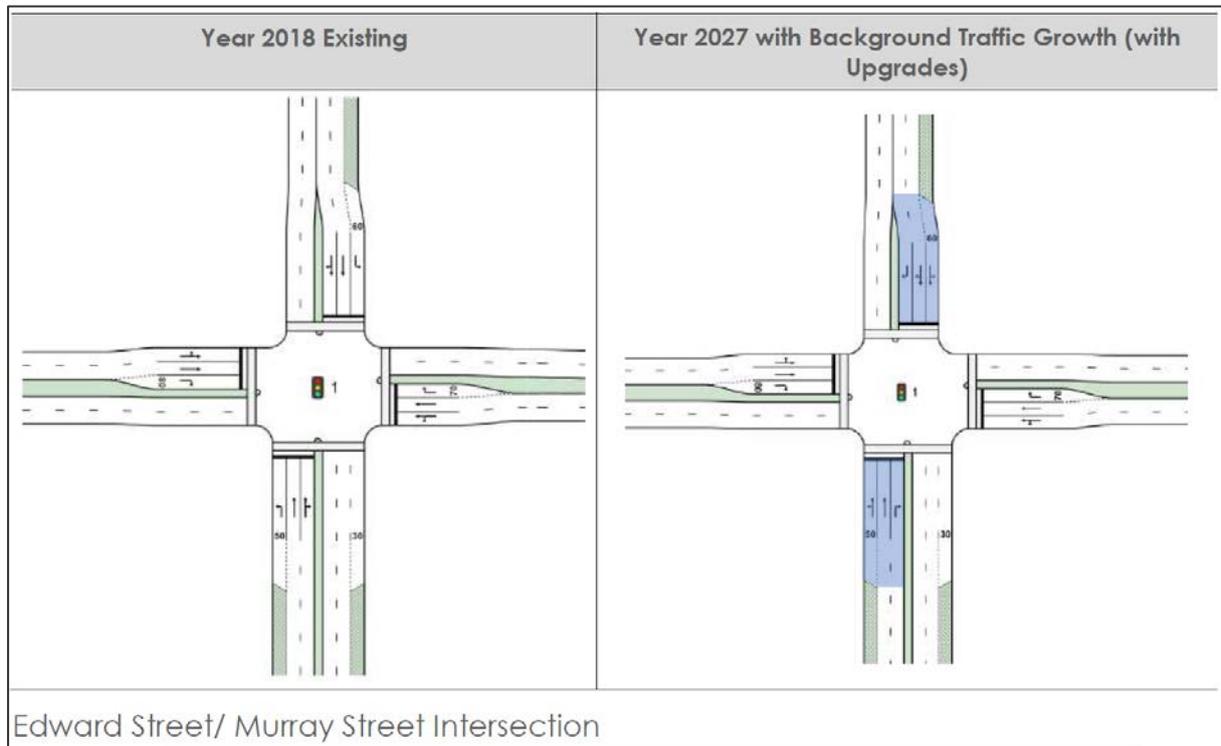


Figure 14 | Edward Street/Docker Street intersection upgrades highlighted in blue (Source: RtS)

- Edward Street/Murray Street intersection:
 - signalise this intersection is proposed as part of the Integrated Movement Study for City of Wagga Wagga (2008).

The result of SIDRA modelling showed that major intersections will still operate at LOS F after the implementation of mitigation measures. These intersections are Edward Street/Murray Street during AM and PM peak, and Edward Street/Brookong Avenue intersection during AM and PM peak. The LOS F is predominantly due to the overflow effects of Edward Street/Murray Street intersection performance.

The TIA concluded that following the upgrades to Edward Street/Murray Street intersection, the queuing effects at the above intersections will be reduced.

The Applicant has also agreed to hold regular ongoing traffic workshops with RMS and Council to discuss development and implementation of the appropriate mitigation measures for the affected intersections, with the ultimate aim to deliver an upgrade of the Edward Street/Murray Street intersection to a LOS C operation in 2031 prior to the operation of the development. In their RtS submissions, both Council and RMS expressed support for this initiative.

In response to the RtS, Council also requested that the upgrade of the Murray Street/Brookong Avenue intersection be included in any conditions of consent due to the overflow effects of the development. The upgrade works would be for traffic calming purposes only.

RMS also required the design of the Applicant's proposed upgrades to the Edward Street/Docker Street intersection as outlined in the TIA to be designed to their satisfaction.

TfNSW noted the Applicant's response that the existing bus stops will not be impacted by the improvements to the Edward Street/Docker Street intersection as they are not within the area of proposed changes. Any potential effects resulting from the construction of the proposed intersections can be managed via a CPTMP as noted above.

The Department is satisfied that the collaborative approach to intersection upgrades through continued traffic workshops will provide the basis for ensuring that traffic impacts are minimised during the operation of the redeveloped hospital. The commitment to attaining LOS C in 2031 at the Edward/Brookong Street intersection and continued consultation with Council and RMS is a positive means of managing potential impacts to the community. As such, the Department has recommended conditions requiring the establishment of a Transport and Traffic Consultative Committee prior to commencement, and the delivery of upgrades to the intersections at Edward Street/Docker Street, Edward Street/Murray Street and Murray Street/Brookong Avenue prior to operation of Stage 3.

6.2.4 Car Parking

The Applicant's TIA referred to Council's DCP 2010 car parking requirements for hospitals based on staffing levels and number of beds. The development will create an additional 94 beds and 115 staff, which is equivalent to an additional 82 parking spaces in accordance with the DCP requirements.

A total of 100 additional parking spaces are provided as part of the Stage 3 development, which is compliant with the DCP requirements. This was reduced from 107 parking spaces as a result of the built form design changes undertaken as part of the RtS.

The Council and RMS submissions on the EIS raised issues in relation to car parking within the hospital precinct and current pressures on on-street parking in surrounding residential streets. The Applicant noted this in its RtS and stated that, while parking supply for Stage 3 is provided for in the proposed development in accordance with the DCP, a feasibility assessment is currently being undertaken for the provision of a multi-storey car park on the campus, which would alleviate current on-street parking demands (noting that this is outside the scope of the current application).

RMS also encouraged the adoption of alternative modes of transport to private vehicles. In response, the Applicant has committed to develop a Work Place Travel Plan (WPTP) that outlines alternative methods of transport for staff, with the aim of reducing staff parking demand. The WPTP would aim to encourage the use of public transport, active transport and car pooling for travel to and from the site thus reducing parking demand.

The Department is satisfied that the amount of parking proposed in the subject application will meet the demand generated by the new ACB. Longer term, the feasibility study into a multi-story hospital carpark is also supported and encouraged by the Department, acknowledging that the delivery of such a facility is outside the scope of this application. The preparation and implementation of a Work Place Travel Plan are also actions that are supported by the Department to ease any potential stress on car parking on the hospital campus. Appropriate conditions of consent are recommended to ensure that they are delivered.

6.3 Noise

An Acoustic Assessment (AA) was undertaken for the proposed Stage 3 development and submitted as part of the EIS. The AA identified a series of potentially affected receivers:

- existing residential properties to the west, across Docker Street.
- existing residential properties to the east, along Doris Roy Lane and Yabtree Street.

- the Heritage Motor Inn.

6.3.1 Construction noise

The Applicant is proposing the following hours of work for construction as outlined in the AA:

- Monday to Friday – 7am to 6pm.
- Saturdays – 7.30am to 5pm.
- Sundays and Public Holidays – No works

EPA guidelines require construction work to not exceed ambient noise levels + 10dB(A)_{Leq(15min)} during standard construction hours (7am-6pm Monday to Friday and 8am to 1pm on Saturdays). For any work outside standard construction hours (as is proposed by the Applicant on Saturdays as noted above), there should be no exceedance of ambient levels + 5dB(A)_{Leq(15min)}. The AA outlined the construction noise emission goal at 75dB(A)_{Leq(15)} and noted that exceedance of this is unlikely to occur given proposed noise attenuating measures. The recommendations of the report included:

- on completion of the construction program, an acoustic review of proposed construction activities and plant/methods/selections should be undertaken to identify the extent and duration of potential exceedances of EPA construction noise management levels.
- community consultation to inform adjacent property owners of potential noise sensitive activities.
- identify feasible acoustic controls or management techniques when exceedance of management noise levels may occur.
- for activities where acoustic controls and management techniques still cannot guarantee compliant noise levels, implement a notification process whereby nearby residences are made aware of the time and duration of noise intensive construction processes.
- implementation of a noise monitoring program during construction and determine additional management strategies if required.

In its submission on the EIS, the EPA stated that, should extended construction times (on Saturdays) be approved, the Applicant should ensure noisy works that are likely to exceed the noise affected target levels are scheduled during periods when people are less likely to be impacted. Identifying sensitive land uses that may be affected and applying the best work practices to minimise noise will assist in managing noise impacts.

The Applicant responded in the RtS that the extended construction hours will reduce the length of the overall construction program.

The Department notes that the previous SSD application (SSD 5237) approved for Stage 2 of the hospital's redevelopment granted extended construction hours for 7am-6pm Monday to Friday and 7am-5pm on Saturdays. The Department is unaware of any significant issues raised by the community or Council regarding these hours and Council did not raise any concerns regarding the proposed extended construction hours for the current application. As the proposed hours are within the scope of hours previously approved by the Department on a similar hospital project, they are supported.

The Department recommends the preparation of a detailed Noise Management Sub-Plan to be incorporated in the Construction Environmental Management Plan. This should include specific activity locations and timeframes and restrictions on certain activities at certain times. It should also outline noise attenuation measures in detail, implementation and auditing protocols as well as community consultation processes throughout construction. This should also include a grievance mechanism to assist the community during the construction period, as well as the recommendations outlined in the AA.

On this basis, the Department believes that noise impacts can be appropriately managed during construction.

6.3.2 Operational noise

On the basis of the attended and unattended monitoring and the NSW EPA Noise Policy for Industry (NPfI), the AA identified a series of noise criteria for intrusiveness, amenity and sleep arousal (average and maximum). These are outlined in **Table 6**.

Table 6 | Summary of Predicted Noise Levels

Location	Period	Background Noise Levels, dB L90, (Period)	Intrusiveness Noise Objective dB(A)L _{Aeq} (15 mins)
Residential receivers along Docker Street	Day	53	58
	Evening	47	52
	Night	41	46
Heritage Motor Inn residential receivers to the east	Day	45	50
	Evening	41	46
	Night	36	41
Location	Period	Amenity Noise Level dB(A)L _{Aeq} (15 mins)	
Existing residential (Suburban)	Day		52
	Evening		50
	Night		44
Commercial	Day		65
	Evening		65
	Night		65
Location	Period	Background Noise Levels, dB(A)L90, (Period)	Sleep Arousal Criteria (Average/Leq Noise Levels) dB(A)L _{Aeq} (15 mins)
Residential receivers along Docker Street	Night (10pm-7am)	41	46
Heritage Motor Inn residential receivers to the east	Night (10pm-7am)	36	41

Location	Period	Background Noise Levels, dB(A)L90, (Period)	Sleep Arousal Criteria (Maximum/LMax Noise Levels) dB(A)LAeq(15 mins)
Residential receivers along Docker Street	Night (10pm-7am)	41	56
Heritage Motor Inn residential receivers to the east	Night (10pm-7am)	36	51

The assessment noted that operational noise sources with the potential to impact on the amenity of surrounding sensitive land users include:

- noise emissions from any external mechanical plant and equipment. For the Stage 3 redevelopment, there will be two cooling towers, chillers, fans and air handling units and a backup generator.
- vehicular noise on site (use of car parks, vehicle circulation).
- noise created on public roads as a result of additional traffic generated by the proposal.

The assessment concluded that in all cases, mechanical plant and equipment can be sufficiently treated to ensure cumulative impacts can achieve compliance with the criteria. In addition, the project is predicted to be compliant regarding traffic noise and car parking.

The Department is satisfied that the Applicant's AA has satisfactorily demonstrated that noise emissions associated with the proposal would, or are capable of being acoustically treated, to ensure they comply with the established project noise trigger levels. The proposed use of the building, including operation of the plant, is unlikely to generate adverse noise impacts. The Department has recommended conditions of consent for requiring:

- that all plant and equipment must be maintained and operated in a properly and efficiently.
- noise associated with plant, machinery or other equipment must not exceed the established project noise trigger levels.
- noise monitoring to verify that operational noise levels do not exceed the project noise trigger levels.
- the provision of noise attenuating measures should noise monitoring identify exceedance of project noise trigger levels.

Subject to compliance with the recommended conditions of consent and implementation of the proposed mitigation measures, the Department is satisfied that operational noise impacts can be appropriately managed.

6.4 Amenity

The following impacts on amenity from the proposed Stage 3 development have been considered as part of the EIS:

- solar access and overshadowing.
- privacy.
- lighting.

Front yard areas of up to four properties on Docker Street are expected to receive shadow for a small period at 9am on 21 June before the shadow moves quickly across the street and onto the campus. As there will be no

impact on living spaces of these properties and they will continue to receive a minimum of three hours of sunlight between 9am and 3pm in mid-winter.

With respect to privacy, there is potential for overlooking from the upper levels of the proposed ACB, however the relative building height and location of the facility towards the centre of the hospital campus means that occupants will generally look out over the dwellings, rather than directly down and into surrounding residential properties. Further, the building has been orientated so that rooms face north and south, with limited opportunities to overlook the closest dwellings to the west.

The hospital is in 24-hour use and lit throughout the night. The EIS noted that the primary source of light spill from the proposed ACB will come from areas of higher glazing, but due to the location of the atrium (surrounded by two at-grade car parks) and the articulated component of the north façade (fronting the CP1 car park), 24-hour illumination of these areas would not have a significant impact on surrounding residential development. Due to proximity of the proposed building from surrounding residential properties, the resultant light spill is not considered to have a significant impact current amenity levels.

The Department is satisfied that these issues have been assessed to a level that provides reasonable input to the design process and that the design itself is sympathetic in terms of resultant amenity impacts on the local residential community.

6.5 Other issues

The Department’s consideration of other issues is provided at **Table 7**.

Table 7 | Department’s assessment of other issues

Issue	Findings	Recommended Condition
Heritage	<p>WWBH is within the vicinity of the Wagga Wagga Heritage Conservation Area as defined by WWLEP. The Wagga Wagga Heritage Conservation Area is located approximately 50m to the east of the proposed car park and directly opposite the southern extremity of the hospital site on the southern side of Rawson Lane.</p> <p>The site is also identified as a local heritage item under WWLEP, however the listed Wagga Wagga Base Hospital has been recently demolished via an approval under Part 5 of the EP&A Act.</p> <p>A Heritage Impact Statement (HIS) was prepared by Weir Phillips Heritage and submitted as part of the EIS.</p> <p>The HIS provided that the new building will not block view corridors into, within, or out of the adjoining conservation area and will read as a larger, modern element within its immediate setting in much the same manner as existing buildings. On this basis, the HIS concludes that proposal would not have any significant impact on the Wagga Wagga Conservation Area.</p> <p>The Department is satisfied this issue has been adequately addressed.</p>	<p>The Department considers no additional conditions or amendments are necessary.</p>

Aboriginal Heritage	<p>The Applicant consulted with the OEH with regard to the need for a comprehensive archaeological assessment. OEH concurred (given the site is highly disturbed) and requested a justification for the position, which is provided in the EIS.</p> <p>Notwithstanding, as a precautionary measure, the Applicant has included the preparation of an Unexpected Finds Protocol in the mitigation measures.</p> <p>Comments from OEH during exhibition required greater clarity in the finds protocol and a recommendation for an AHIMS search with records kept on-site. The Applicant undertook an AHIMS search which revealed no results. These findings were presented in the RtS.</p> <p>The Department is satisfied this issue has been adequately addressed.</p>	<p>The Department considers no additional conditions or amendments are necessary, other than the inclusion of an Unexpected Finds Protocol in the Construction Environmental Management Plan.</p>
Biodiversity and tree removal	<p>No trees are required to be removed to facilitate the proposed development.</p> <p>The EIS stated the proposal will not involve clearing any native vegetation or natural habitats, or habitat of any importance to native plants or animals.</p> <p>OEH concurred that no offsets are required for the proposed development under the Biodiversity Conservation Act 2016.</p> <p>No works are expected to impact on existing vegetation and no trees will be removed. Notwithstanding, the project has included a mitigation measure for tree protection, if required, in accordance with Australian Standards (2009) AS4970: Protection of Trees on Development Sites.</p> <p>The Department is satisfied this issue has been adequately addressed and agrees that as a precautionary measure, AS4970 would be a reasonable measure to include in a Construction Environmental Management Plan to avert accidental damage to extant trees in and around the development site.</p>	<p>The Department has recommended a condition requiring the inclusion of AS4970 in the Construction Environmental Management Plan.</p>
Water and erosion and sediment control	<p>The stormwater management assessment in the EIS confirmed that the proposed stormwater system can accommodate the proposed development and has been designed to meet:</p> <ul style="list-style-type: none"> • Council’s Engineering Guidelines for Subdivisions and Developments. • Council DCP. • Australian Rainfall and Runoff, Australian Runoff Quality – a Guide to Water Sensitive Urban Design, Australian Standard AS3500. 	<p>The Department has recommended a condition requiring the preparation of an Erosion and Sediment Control Sub-Plan as part of the Construction Environmental Management Plan that identifies, maps and explains specific measures to avoid sediment run-off,</p>

- all other relevant Australian Standards.

The EIS also noted that Water Sensitive Urban Design (WSUD) measures will be provided in accordance with Council’s DCP and City of Wagga Wagga Council Engineering Guidelines for Subdivisions and Development Standards 2017. Water quality controls will be achieved through a combination of storm filters, enviropods and bioretention areas.

Riverina Water County Council noted no issues in their submission on the EIS and no other submissions were received with respect to this issue.

The Department is satisfied this issue has been adequately addressed.

particularly with respect to location and management or stockpiled materials.

Waste	<p>A waste assessment and management plan has been prepared as part of the EIS. It noted that operationally, the proposal would not introduce any waste that is not already managed by the existing hospital operations. However, the assessment identified management measures and disposal destinations for each waste stream for general, recycling and clinical waste.</p> <p>Various waste streams are also identified during the construction process.</p> <p>The Department believes this issue has been adequately addressed and as a precautionary measure, the Waste Management Plan should be updated with site specific data (e.g. designated waste disposal points, waste stockpiles and their management and so on) to be added as a Sub-Plan to the Construction Environmental Management Plan.</p>	<p>The Department has recommended a condition requiring the inclusion of an updated Waste Management Sub-Plan in the Construction Environmental Management Plan</p>
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7. Evaluation

The proposed SSD application seeks approval for the demolition, construction and operation of Stage 3 of the Wagga Wagga Hospital redevelopment. The Department has reviewed the EIS, RtS and assessed the merits of the proposal, taking into consideration advice from the public authorities, including Council. Issues raised in public submissions have been considered and all environmental issues associated with the proposal have been thoroughly addressed.

The Department's assessment of the project concludes that:

- impacts to the local road network and planning for traffic with respect to the proposal can be adequately managed via upgrades of surrounding intersections. Conditions of consent have been recommended requiring consultation with TfNSW, RMS and Council.
- the design of the building, with planned green spaces and landscape plan, represents good design in terms of functional amenity, as well as appropriate spaces for patient healthcare, staff wellbeing and surrounding local amenity.
- the design of the proposed Stage 3 development appropriately responds to its context, and minimises any significant environmental amenity impacts such as overshadowing and overlooking.
- demolition and construction effects, including construction noise, dust and water management, have been adequately assessed and understood, and that precautionary measures can be undertaken to be preventative of any potential impacts to the community.

The proposal is consistent with key government strategic objectives for both the state and regional, including the NSW State Infrastructure Strategy 2018-2038, the Riverina Murray Regional Plan 2036 and the Draft Future Transport Strategy 2056.

The proposal is in the public interest as the future development would provide public benefits, including:

- the redevelopment will enhance the ability to deliver modern health care in a regional setting. This supports the goals of the Riverina Murray Regional Plan which seeks to attract and keep people in regional settings by connecting them to better facilities, including health care.
- the ageing population rate in Wagga Wagga is far higher than the overall rate for the Murrumbidgee Local Health District, which will give rise to the need for non-acute inpatient, ambulatory and community services – services that this proposal will provide.
- the proposal will create 320 construction jobs and over 150 additional jobs once operational.

The Department concludes the impacts of the development are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved subject to conditions.



8. Recommendation

It is recommended that the Executive Director, Priority Project Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant approval to the application.
- **agrees** with the key reasons for approval listed in the notice of decision.
- **grants approval** for the application in respect of Wagga Wagga Base Hospital Stage 3 Redevelopment State Significant Development Application (SSD 9033).
- **signs** the attached development consent and recommended conditions of approval (**Appendix C**).

Recommended by:

Teresa Gizzi

Senior Planner

Social and Other Infrastructure Assessments

Recommended by:

David Gibson

Team Leader

Social and Other Infrastructure Assessments



9. Determination

The recommendation is: **Adopted by:**

David Gainsford

Executive Director

Priority Projects Assessments

18/12/18.



Appendices



Appendix A - List of Documents

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows.

1. Environmental Impact Statement
<https://majorprojects.accelo.com/public/3c71b18c68f394807ebf62805425db2d/Environmental%20Impact%20Statement.pdf>
2. Submissions
http://majorprojects.planning.nsw.gov.au/?action=list_submissions&job_id=9033&title=EIS%20-%20Website%20Submissions&type=6
http://majorprojects.planning.nsw.gov.au/?action=list_submissions&job_id=9033&title=EIS%20-%20Website%20Submissions&type=2
3. Applicant's Response to Submissions
<https://majorprojects.accelo.com/public/244fe5cc14031e6b5d03a1ce8e5e61d8/2018-10-10%20Response%20to%20Submissions.pdf>
4. Applicant's Response to Submissions Supplementary Information (updated landscape drawings and Noise Impact Assessment)
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9033

Appendix B - Statutory Considerations

9.1.1 ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department's environmental assessment.

Controls considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State & Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
- State Environmental Planning Policy No. 64 – Advertising Structures and Signage (SEPP 64)
- Wagga Wagga Local Environmental Plan 2010 (WWLEP)

9.1.2 COMPLIANCE WITH CONTROLS

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

Table 1 | SRD SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
<p>3 Aims of Policy The aims of this Policy are as follows:</p> <p>(a) to identify development that is State significant development</p>	The proposed development is identified as SSD.	Yes
<p>8 Declaration of State significant development: section 4.36</p> <p>(1) Development is declared to be State significant development for the purposes of the Act if:</p> <p>(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and</p> <p>(b) the development is specified in Schedule 1 or 2.</p>	The proposed development is permissible with development consent. The development is a type specified in Schedule 1.	Yes
<p>Schedule 1 State significant development – general</p> <p>(Clause 14)</p> <p>14 Hospitals, medical centres and health research facilities</p> <p>Development that has a capital investment value of more than \$30 million for any of the following purposes:</p> <p>(a) hospitals,</p> <p>(b) medical centres,</p> <p>(c) health, medical or related research facilities (which may also be associated with the facilities or research</p>	The proposed development comprises development for the purpose of a hospital and has a CIV in excess of \$30 million.	Yes

activities of a NSW local health district board, a University or an independent medical research institute).

State Environmental Planning Policy (Infrastructure) 2007

The Infrastructure SEPP (ISEPP) aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

The proposal does not alter the use of the site. The site is categorised under the ISEPP as a hospital, within the meaning of 'health services facilities'. The site is zoned SP2 Infrastructure under the WWLEP. The SP2 zone is defined as a 'prescribed zone' pursuant to clause 56 of the ISEPP. The use of the site as 'health services facilities' is permissible with consent under the ISEPP.

The ISEPP aims to ensure that the RMS is made aware of and is given an opportunity to make representations in respect of traffic generating development. The ISEPP sets out the types of development which must be referred to the RMS. For hospitals a threshold of 200 beds is identified as the trigger for traffic generating development (unless site with access to classified road or to road that connects to classified road within 90m of the site).

Following the completion of the proposed works, MHS will have an additional 94 beds (existing 393 beds/chairs/consultation room). This is under the threshold whereby referral to RMS would be necessary. Consultation has been carried out with the RMS prior to the lodgement of this SSDA and details of this consultation are provided at Section 5 of the EIS.

The proposal is therefore consistent with the ISEPP.

State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP33)

SEPP 33 provides clear definitions of hazardous and offensive industries and aims to facilitate development defined as such and to ensure that in determining developments of this nature, appropriate measures are employed to reduce the impact of the development.

SEPP 33 requires an assessment of hazardous materials, involving a screening method based on the quantities of dangerous goods on a site, to assist in determining if a development is likely to be a potentially hazardous industry.

Whilst the development does not consist of new hazardous activities, an assessment of the nature and quantity of dangerous goods that will potentially be stored/used at Wagga Wagga Rural Referral Hospital in accordance with the requirements of SEPP 33, should be undertaken, with a view determining if the development is considered potentially hazardous or offensive using the nominated performance criteria.

A SEPP 33 Assessment has been provided at Appendix P of the EIS. The assessment outlines the dangerous goods quantified are within the threshold limit in SEPP 33.

The Department is satisfied that no further PHA is required.

State Environmental Planning Policy No. 55 - Remediation of Land (SEPP 55)

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application.

The results of remediation assessment identified that the remediation works are considered Category 2 which do not require consent. A Remediation Action Plan (RAP) (Appendix F of the EIS) and Waste Management Plan (Appendix P of the EIS) have been developed for the appropriate management of hazardous materials. The RAP is to ensure that the identified contamination at the site can be appropriately remediated/managed to protect human health and the environment.

Based on the findings and appropriate mitigation strategies, the Department is satisfied that the site can be made suitable for the continued hospital use.

State Environmental Planning Policy No. 64 – Advertising and Signage

SEPP 64 aims to improve the amenity of urban and visual character of an area by managing the impact of signage.

Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the proposal is consistent with the objectives of the SEPP and with the assessment criteria which are contained in Schedule 1 of the SEPP.

The development proposes a signage zone on the eastern elevation of the ambulatory care building that has a dimension of 10.6 m x 2.8 m. Approval for the detailed design of the sign will be sought separately to this proposal.

Wagga Wagga Local Environmental Plan 2010 (WWLEP)

The WWLEP aims to promote development that is consistent with the principles of ESD and management of climate change. The WWLEP also aims to coordinate development with the provision of public infrastructure and services. The proposal is consistent with the aims of the SP2 zone to provide for infrastructure and related uses.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of WWLEP and those matters raised by Council in its assessment of the development (refer to **Section 5**). The Department concludes the development is consistent with the relevant provisions of the WWLEP. Consideration of the relevant clauses of the WWLEP is provided in **Table 2**.

Table 2 | Consideration of the WWLEP

Wagga Wagga LEP 2010	Department Comment/Assessment
Clause 4.3 Height of buildings	No maximum height applies to the site under the WWLEP. However, the proposal has a maximum height of 28m, which is 9.26m lower than the Stage 2 ASB.
Clause 4.4 Floor space ratio	There is no FSR control under the WWLEP relevant to the site.
Clause 5.10 Heritage conservation	Under the provisions of Clause 5.10 of the WWLEP, the consent authority may, prior to granting consent, require a heritage management document which assesses the impact of a development on heritage items within the vicinity of Wagga Wagga Rural Referral Hospital. Further consideration of heritage, with respect to the Heritage Impact Statement is provided in Sections 6.5 and 6.6 of the EIS.
Clause 7.2 Flood planning	The site is not located within the flood planning zone.
Clause 7.3 Biodiversity	The proposal will not involve clearing any native vegetation or natural habitats,

or habitat of any importance to native plants or animals. Furthermore, the proposal does not require any offsets under the BAM, and thus no ecosystem credits or species credits are required.

Other Policies

In accordance with Clause 11 of the SRD SEPP, Development Control Plans (DCPs) do not apply to State significant development. Despite this provision, consideration of the relevant development controls contained within Council's DCP is provided in **Table 3**.

Table 3 | Wagga Wagga DCP compliance table

Wagga Wagga DCP	Department Comment/Assessment
2.2 Off-street parking	Off-street parking under DCP requirements for hospital use is 1 space / 4 beds plus, and 1 space / 2 employees and 1 ambulance space. This is equivalent to 82 parking spaces requirement. The proposal will provide 100 additional parking spaces.

Appendix C - Recommended Instrument of Consent/Approval