



Planning

**MAJOR PROJECT ASSESSMENT:
Wollongong Private Hospital
360-364 Crown Street and 9-11 Urunga
Parade, Wollongong
(MP07_0070)**



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

March 2011

ABBREVIATIONS

CIV	Capital Investment Value
Department	Department of Planning
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning
PAC	Planning Assessment Commission
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
PEA	Preliminary Environmental Assessment
PFM	Planning Focus Meeting
PPR	Preferred Project Report
Proponent	The Planning Group Pty Limited
RtS	Response to Submissions

Cover Photograph: Crown Street Photomontage

© Crown copyright 2011
Published March 2011
NSW Department of Planning
www.planning.nsw.gov.au

Disclaimer:

While every reasonable effort has been made to ensure that this document is correct at the time of publication, the State of New South Wales, its agents and employees, disclaim any and all liability to any person in respect of anything or the consequences of anything done or omitted to be done in reliance upon the whole or any part of this document.

EXECUTIVE SUMMARY

This report is an assessment of an application by The Planning Group NSW Pty Ltd (the Proponent), seeking approval for the construction of a new private hospital medical facility, to be known as Wollongong Private Hospital (WPH), pursuant to Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The subject site has an area of 4986sqm and is located approximately 800m west of Wollongong Train Station and approximately 100m west of the existing Wollongong Public Hospital. The site has frontages to both Crown Street (Princes Highway) and Urunga Parade, with Crown Street being the principal frontage.

The site currently contains three existing single storey brick and clad residential dwellings, a dilapidated 2 storey brick building (former nursing home establishment) and attached single storey building and ancillary structures. Vehicular access to the site is provided by driveways from Crown Street and Urunga Parade. All structures on site are proposed to be demolished as part of the development.

The project application seeks approval for the demolition of the existing structures on site, construction of a new signalised intersection at Crown and Staff Streets and construction of a new 8 storey private hospital and 3 basement levels of car parking, comprising a total of 18,390sqm of GFA and associated landscaping.

The proposal has a Capital Investment Value (CIV) of **\$114,428,546** and the proposal would create **90** full time equivalent construction jobs and **300** full time equivalent operational jobs.

The site is zoned "SP1 Special Activities – Wollongong Hospital Precinct" under *Wollongong Local Environmental Plan 2009* and the proposed development is permissible with consent.

On 24 November 2008, the Director General, as a delegate for the Minister, formed the opinion that the project is a major project under clause 18 of Schedule 1 of the MD SEPP, as it is for a hospital with a capital investment value of more than \$15 million.

The proposal was exhibited from 28 July 2010 to 27 August 2010. The Department received 5 submissions from public authorities – one from Wollongong City Council, NSW Health, South Eastern Sydney Illawarra Area Health Service, Roads and Traffic Authority and Transport NSW – and 22 public submissions. Key issues raised within the submissions included:

- Non-compliance with Wollongong LEP 2009 FSR control;
- Heritage impacts;
- Traffic impacts;
- Unfeasible development proposal;
- Over servicing of health services in Wollongong CBD;
- Construction and operational impacts; and
- General objections to private health.

On 13 December 2010, the Proponent submitted a Preferred Project Report (PPR) and revised Statement of Commitments (SoC). The PPR provided a response to concerns raised, including amendments to the design of the development that reduce the proposed gross floor area (GFA) and overall FSR (FSR) of the development and to provide for improved design outcomes to both the Crown Street and Urunga Parade elevations. Further traffic modelling was also undertaken by the Proponent to satisfy concerns raised by the RTA in relation to the establishment of a new signalised intersection.

The Department has assessed the merits of the proposal, and consider that the key issues associated with the project relate to built form and urban design, transport, suitability of a private hospital use, environmental and residential amenity, heritage, ecologically sustainable development and public interest. These issues have been assessed in detail and the Department is satisfied that they can be adequately mitigated and managed to ensure a satisfactory level of environmental performance, pursuant to section 75J of the EP&A Act.

The Department is satisfied the site is suitable for the proposed use and that the project will provide significant social and economic benefits for the region, and is consistent with the strategic planning objectives of the Illawarra Regional Strategy, as it would:

- Reinforce the major employment role of health services within the Wollongong Region and support Wollongong's role as the regional city;
- Assist in meeting future medical and health service demands of the region and reinforce the co-location of health services within the 'Wollongong Medical Precinct' and make provision for teaching facilities; and
- Encourage the use of public transportation and reduce car dependency.

The Department therefore considers the project to be in the public interest and the Project Application should be approved, subject to conditions.

TABLE OF CONTENTS

1.	BACKGROUND	1
2.	PROPOSED PROJECT	5
2.1	PROJECT DESCRIPTION	5
2.2	PROJECT NEED AND JUSTIFICATION	9
3.	STATUTORY CONTEXT	11
3.1	MAJOR PROJECT	11
3.2	PERMISSIBILITY	11
3.3	ENVIRONMENTAL PLANNING INSTRUMENTS	11
3.4	OBJECTS OF THE EP&A ACT	11
3.5	ECOLOGICALLY SUSTAINABLE DEVELOPMENT	12
3.6	STATEMENT OF COMPLIANCE	13
4.	CONSULTATION AND SUBMISSIONS	14
4.1	EXHIBITION	14
4.2	PUBLIC AUTHORITY SUBMISSIONS	14
4.3	PUBLIC SUBMISSIONS	17
4.4	PROPONENT'S RESPONSE TO SUBMISSIONS	18
5.	ASSESSMENT	20
5.1	BUILT FORM AND URBAN DESIGN	20
5.2	TRANSPORT	25
5.3	SUITABILITY OF PRIVATE HOSPITAL	29
5.4	ENVIRONMENTAL AND RESIDENTIAL AMENITY	31
5.5	HERITAGE IMPACTS	33
5.6	ECOLOGICALLY SUSTAINABLE DEVELOPMENT	36
5.7	PUBLIC INTEREST	37
6.	RECOMMENDATION	38
APPENDIX A	ENVIRONMENTAL ASSESSMENT	39
APPENDIX B	SUBMISSIONS	40
APPENDIX C	PROPONENT'S RESPONSE TO SUBMISSIONS	41
APPENDIX D	CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS	42
APPENDIX E	PLANNING ASSESSMENT COMMISSION REPORT	44
APPENDIX F	POLITICAL DONATION DISCLOSURES	46
APPENDIX G	RECOMMENDED CONDITIONS OF APPROVAL	47

1. BACKGROUND

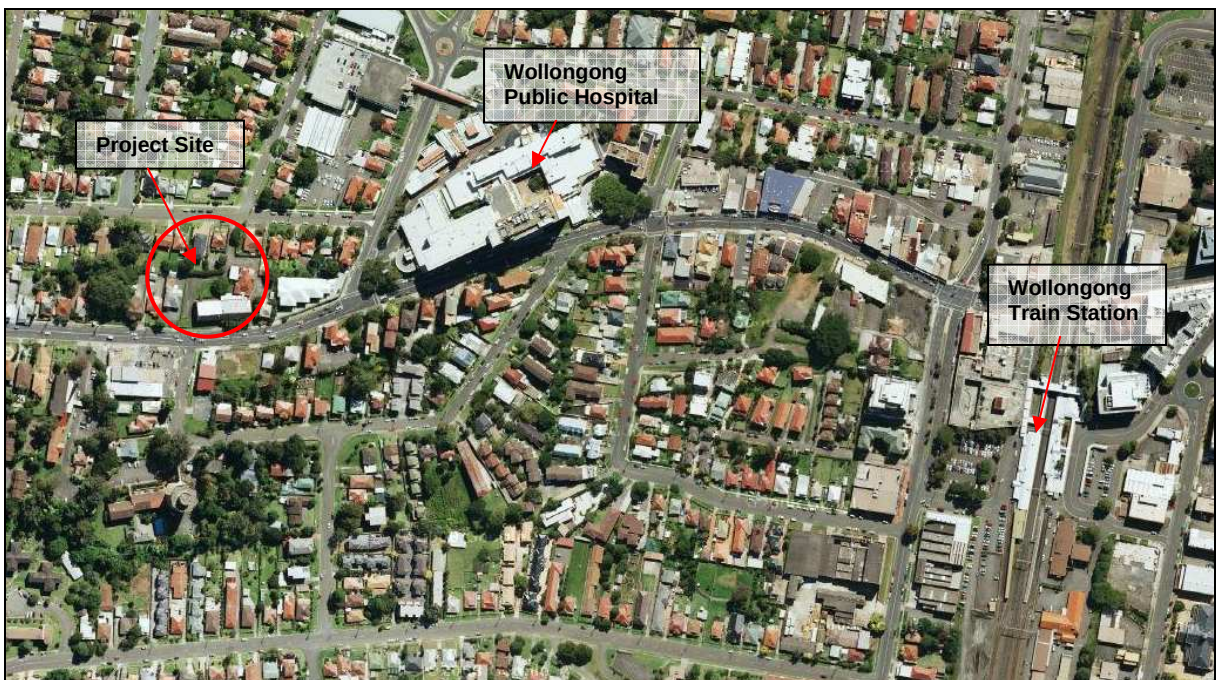
1.1 SITE CONTEXT AND LOCATION

The Planning Group Pty Limited (on behalf of AA Crown Pty Ltd) proposes to construct the Wollongong Private Hospital, at 360-364 Crown Street and 9-11 Urunga Parade, Wollongong, known legally as:

- Lot 7 in DP 661166 and Lot 1 in DP 565056 (360-364 Crown Street);
- Lot 53, Section 1 in DP 5507 (9 Urunga Parade); and
- Lot A in DP 381246 (11 Urunga Parade).

The development site, under the ownership of AA Crown Pty Ltd, is located approximately 800m from Wollongong Train Station and 200m from the existing Wollongong Public Hospital on the northern side of Crown Street. The project location is shown in Figure 1. The subject site is located within the Wollongong local government area.

Figure 1: Project Location



The development site has a total site area of approximately 4986sqm and fronts both Crown Street and Urunga Parade (refer to Figure 2), with frontages of 75.75m and 45.72m respectively. The site topography varies and is characterised by a small rise at the centre of the site, falling towards the south western and north western corners of the site by approximately 5m and 5.6m respectively.

The development site currently contains 3 existing single storey brick and clad residential dwellings, a dilapidated 2 storey brick building (former nursing home establishment) and attached single storey building and ancillary structures. Vehicular access to the site is provided by driveways from Crown Street and Urunga Parade. All structures on site are proposed to be demolished as part of the development. The development site was inspected by Department officers on 10 August 2010.

Crown Street acts as a key transport corridor, linking the site to the existing Wollongong Public Hospital, city centre and surrounding suburbs. Urunga Parade acts as a traditional residential street (see Figure 3) under the influence of the parking demand generated by the existing Wollongong Public Hospital and surrounding medical establishments.

Figure 2: Project Site



Pedestrian access to the subject site is provided by footpaths along both Crown Street and Urunga Parade. Opportunities for pedestrian movement between either side of Crown Street surrounding the site are restricted to the controlled intersection of Crown Street and New Dapto Road.

1.2 SURROUNDING DEVELOPMENT

The site is located within an area known as 'Hospital Hill', but is generally surrounded by detached residential dwellings, as well as the Wollongong Day Surgery located adjacent to the east of the subject site, while Wollongong Public Hospital is located approximately 200m further east (see Figure 1). The site also falls within the existing Wollongong Hospital Precinct, as identified within the *Wollongong Local Environmental Plan 2009*, located towards the western edge of the precinct.

Development along Crown Street consists of a mixture of different commercial land uses, medical offices and one to two storey residential dwellings, some of which have been converted for use as commercial offices, including a number of medical consulting office establishments within close proximity of the existing hospital precinct.

Directly adjoining the eastern and western sides of the site along Crown Street are the Wollongong Day Surgery and an existing heritage item (see Figures 5 and 6). Along Urunga Parade, development surrounding the subject site is characterised predominantly by single and two storey brick and clad residential dwellings, with the exception of a three storey residential flat building at 17 Urunga Parade (see Figures 7 and 8).

Figure 3: Urunga Parade



Figure 4: Wollongong Public Hospital



Figure 5: 366 Crown Street (Heritage Item)



Figure 6: Wollongong Day Surgery



Figure 7: 7 Urunga Parade



Figure 8: 15 & 17 Urunga Parade



1.3 STRATEGIC CONTEXT

1.3.1 NSW State Plan

Key priorities of the NSW State Plan include the support for the retainment of jobs and employment closer to home, increase business investment within regional NSW and improve access to quality health care services. The proposed development will complement the NSW State Plan through the creation of new jobs and services to help support the continued growth of Wollongong, particularly the Wollongong City Centre. The provision of a new

private hospital within the existing Wollongong Hospital Precinct will create investment and jobs for the region and provide better access to a range and choice of quality health care services.

1.3.2 Illawarra Regional Strategy

The Illawarra Regional Strategy outlines Wollongong's future role as the region's capital city. By closely locating the proposed health facility within the Wollongong Hospital Precinct, the proposal will reinforce the role of health services in being a major employment provider for the Illawarra Region's capital city and continued growth of the Wollongong City Centre. Despite having an aging population, with the median age increasing from 36 to 44 years by 2031, the Illawarra Region is still expected to experience a rise in population of 47,600 residents and generate approximately 30,000 new jobs over the next 25 years.

The proposed development will assist in meeting targeted job growth rates within the Wollongong City Centre, improve the provision of health infrastructure for a growing and ageing population and provide educational and teaching opportunities within a working hospital environment in collaboration with Wollongong University.

2. PROPOSED PROJECT

2.1 PROJECT DESCRIPTION

The proposed development seeks approval for the demolition of existing buildings and ancillary structures, construction of a new signalised intersection at Crown Street and Staff Street and the development of a new 8 storey private hospital with a total GFA of 18,390sqm. The proposed private hospital consists of the following:

- Private Hospital:
 - o 156 medical, surgical and maternity inpatient beds;
 - o Operating Theatre Suite (OTS) with 9 operating rooms, one procedure room, 31 holding/first stage recovery bays, 9 second stage recovery bays; support staff and administration facilities;
 - o Central Sterile Stock Department;
 - o 10 bed Intensive Care Unit adjacent to the OTS;
 - o 3 Birthing Rooms with support spaces;
 - o Admission, reception, waiting and hospital administration, Medical Records and staff facilities;
 - o Pharmacy; and
 - o Kitchen, linen handling, facilities management, biomedical engineering, central stores, bulk oxygen supply, waste management and goods handling/loading.
- General Practice Centre:
 - o General practice consulting rooms;
 - o Diagnostic Radiology Centre, with general X-ray, Magnetic Resonance Imaging (MRI), Ultrasound, Single Photon Emission Computed Tomography (SPECT) and support spaces;
 - o Pathology collections and analysis laboratory;
 - o Physiotherapy treatment; and
 - o Dietician.
- Diagnostic, clinical and allied health tenancies:
 - o Angiography Unit with 3 Catheter Laboratories, 14 holding/first stage recovery bays, 8 second stage recovery bays and support spaces;
 - o 12 bed Coronary Care Unit (CCU)
 - o Nuclear Medicine Unit with 2 Computed Tomography (CT) gamma camera scanning rooms, stress testing room, hot lab and injecting room;
 - o Oncology Unit with 18 chemotherapy spaces;
 - o Renal Dialysis; and
 - o Hyperbaric Medicine Unit.
- Specialist medical Consulting Suites:
 - o Gastroenterology;
 - o Urology;
 - o Podiatry;
 - o Neurology/Spinal Unit;
 - o Paediatrics;
 - o Dermatology;
 - o Obstetrics;
 - o Gynaecology;
 - o Women's Health;
 - o Breast Unit;
 - o Hand Surgery Unit; and
 - o Cosmetic Surgery Unit.
- University of Wollongong Teaching Centre
- Ancillary retail tenancies:
 - o Coffee shop;
 - o Retail pharmacy; and

- o Florist
- Off street parking for 324 vehicles (including 12 accessible spaces) provided within 3 basement levels.

The CIV for the proposal is \$144,428,546 and will create 90 construction jobs and 300 full time equivalent jobs. The project layout is shown on the Ground Floor Plan in Figure 9.

Figure 9: Ground Level



At Ground Level, the proposal provides an entrance foyer accessible from the drop off bay and directly from Crown Street, providing for lettable floor space, kitchen and facilities management and bulk stores. Staff facilities, medical records and the main administration and reception services are located on Level 1 (see Figures 9 and 10). Level 2 is proposed to be dedicated for the proposed Professional Consulting Suites. Levels 3 to 7 comprise of the main hospital functions, including the medical, surgical and maternity inpatient beds, diagnostic, clinical and allied health tenancies, operating theatre suites, birthing rooms and university teaching centre (see Figures 11 and 12).

Vehicular access to the site is proposed from both Crown Street (via a new signalised intersection) and Urunga Parade (see Figure 13), and provision is made for 324 car parking spaces over 3 basement levels. Crown Street is proposed to accommodate both ingress and egress movements, while Urunga Parade will cater for ingress movements only.

The site plan shows the layout of the FFL50.0 building. The building is divided into several colored sections: yellow for administrative and medical services, blue for lettable space, and pink for the G.P. Centre. Key areas include:

- STAFF FACILITIES**: 225sq.m.
- ADMIN SERVICES**: 520sq.m.
- MEDICAL RECORDS**: 180sq.m.
- MAIN RECEPTION**
- WAIT**
- LETTABLE SPACE**: 300sq.m.
- G.P. CENTRE**: 1090sq.m. Inc. STAIR
- VOID**
- UFT** (Utility/Fit-out rooms)

Dimensions and other features include:

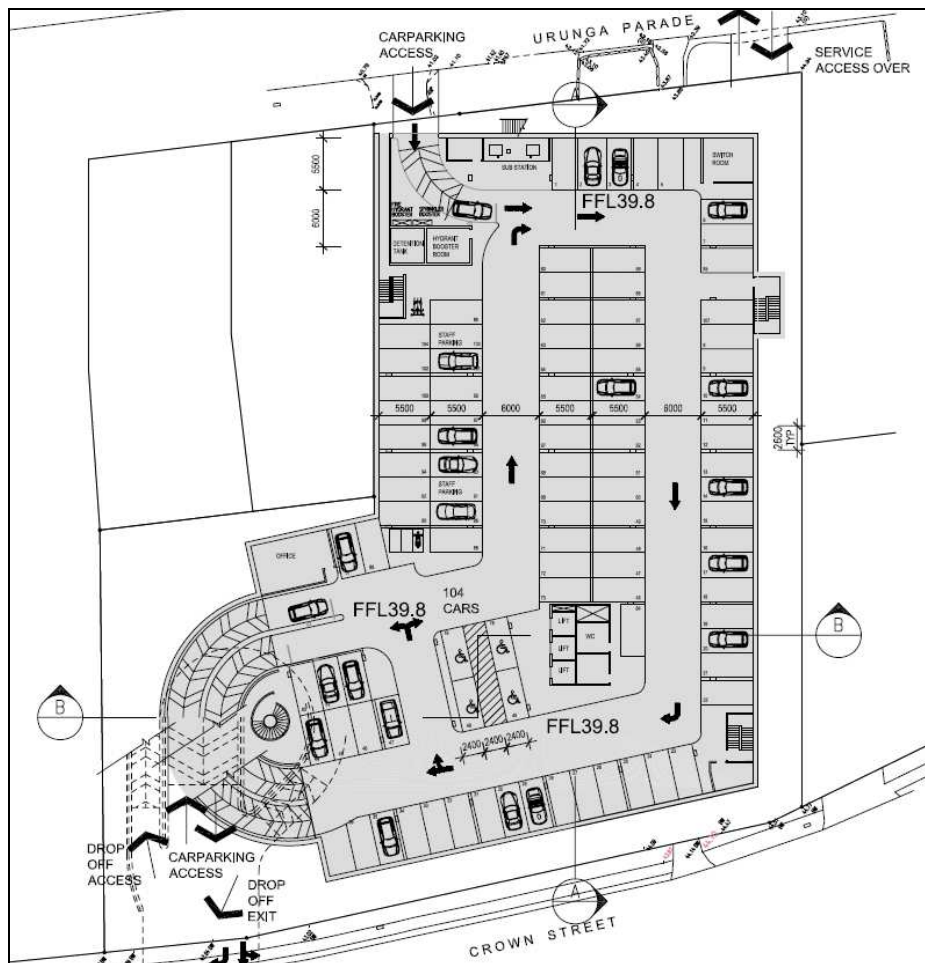
- Overall dimensions: 6000 (width), 4723 (depth), 6000 (depth), 6000 (width), 6000 (width).
- Carparking Access at the top.
- Compass rose indicating North (N) and South (S).
- Orientation markers A and B.

[illegible]

Figure 12: Level 5



Figure 13: Basement Level 1



The Crown Street access point also provides for at-grade short term parking and a drop-off/pick-up area. Loading and unloading facilities are provided at the rear of the proposed development from a driveway on Urunga Parade, separate from the proposed basement entrance (see Figure 9).

The proposed hospital involves a landscaping and public domain works scheme (see Figure 14) which was developed having regard to the Wollongong City Council Public Domain Technical Manual. The scheme provides a range of feature trees, shrubs, ferns and groundcovers to supplement the building design and provide natural screening to elements of the development. The proposal similarly involves embellishment of a roof garden on Level 5 (Level 4 roof), consisting of paved outdoor terraces and low decorative groundcover and succulent plantings.

Figure 14: Landscape Concept Plan



2.2 PROJECT NEED AND JUSTIFICATION

The proposed development will make a positive contribution towards the provision of high quality medical health services and assist in meeting the employment capacity targets for the growing Illawarra region. The facilities to be provided within the proposed hospital have been identified based on the experience and knowledge of the consortium of doctors that own the land. Their proposal seeks to close the gaps that currently exist between medical and health services provided within the Illawarra Region.

The proposal will also help to develop the vision of a consolidated medical hub through the co-location of the proposed private hospital facilities and services with the existing adjoining Wollongong Public Hospital, envisaged by the previous *Wollongong City Centre LEP 2007 SP1* Special Activities – Hospital and Medical Research and Development zone and current WLEP

2009 SP1 – Special Activities (Wollongong Hospital Precinct) zoning of the subject site and its surrounds to create the Wollongong Hospital Precinct.

3. STATUTORY CONTEXT

3.1 MAJOR PROJECT

The proposal is a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as it is development for the purpose of a Hospital under clause 18 of Schedule 1 of *State Environmental Planning Policy (Major Development) 2005*. The CIV of the development is \$114,428,546. Therefore the Minister for Planning is the approval authority.

On 18 November 2008, the Minister for Planning delegated to the Planning Assessment Commission the function as an approval authority to determine a project application under section 75J and 75JA of the *Environmental Planning and Assessment Act 1979* if the application:

- has a reportable political donation; or
- is within the electoral district of the Minister for Planning; or
- in which the Minister has a pecuniary interest.

The Proponent has disclosed a reportable political donation. Consequently, this project meets the terms of the Minister's delegation which may be determined by the Planning Assessment Commission under delegated authority.

3.2 PERMISSIBILITY

The site is zoned "SP1 Special Activities – Wollongong Hospital Precinct" under Wollongong Local Environmental Plan 2009. Hospital developments are permissible within the zone, subject to consent.

The proposed development is considered to be consistent with the zone objectives, which includes facilitating development that is in keeping with the special characteristics of the site and intended special use and that minimises adverse impacts on surrounding land.

3.3 ENVIRONMENTAL PLANNING INSTRUMENTS

Under Sections 75I(2)(d) and 75I(2)(e) of the EP&A Act, the Director-General's report for a project is required to include a copy of, or reference to, the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project, and the provisions of any environmental planning instruments (EPI) that would (except for the application of Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the assessment of the project. The primary controls guiding the assessment of the proposal are:

- State Environmental Planning Policy (Major Projects) 2005;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No. 55 - Remediation of Land; and
- Wollongong Local Environmental Plan 2009.

The Department's consideration of relevant SEPPs and EPIs is provided in Appendix D.

3.4 OBJECTS OF THE EP&A ACT

Decisions made under the EP&A Act must have regard to the objects of the Act, as set out in Section 5 of the Act. The relevant objects are:

- (a) *to encourage:*
 - (i) *the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water,*

- cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
- (ii) the promotion and co-ordination of the orderly and economic use and development of land,*
 - (iii) the protection, provision and co-ordination of communication and utility services,*
 - (iv) the provision of land for public purposes,*
 - (v) the provision and co-ordination of community services and facilities, and*
 - (vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
 - (vii) ecologically sustainable development, and*
 - (viii) the provision and maintenance of affordable housing, and*
- (b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

The Department has considered the objects of the Act and considers that the project application is consistent with the relevant objects. The assessment of the application in relation to the relevant objects of the Act is outlined in Section 5 of this report.

3.5 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

The EP&A Act adopts the definition of Ecologically Sustainable Development (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:

- (a) the precautionary principle - namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by:*
 - (i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and*
 - (ii) an assessment of the risk-weighted consequences of various options,*
- (b) inter-generational equity—namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,*
- (c) conservation of biological diversity and ecological integrity—namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,*
- (d) improved valuation, pricing and incentive mechanisms—namely, that environmental factors should be included in the valuation of assets and services, such as:*
 - (i) polluter pays—that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,*
 - (ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,*
 - (iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.*

The Department has fully considered the objects of the EP&A Act, including the encouragement of ESD, in its assessment of the application. Further and detailed assessment of ESD is outlined in Section 5 of this report. On the basis of this assessment,

the Department is satisfied that the proposal encourages ESD, in accordance with the objects of the EP&A Act.

3.6 STATEMENT OF COMPLIANCE

In accordance with section 75I of the EP&A Act, the Department is satisfied that the Director-General's environmental assessment requirements have been complied with.

4. CONSULTATION AND SUBMISSIONS

4.1 EXHIBITION

Under section 75H(3) of the EP&A Act, the Director-General is required to make the environmental assessment (EA) of an application publicly available for at least 30 days. After accepting the EA, the Department publicly exhibited it from 28 July 2010 until 27 August 2010 (30 days) on the Department's website, and at the Information Centre of the Department of Planning, Department of Planning, Wollongong Office and Wollongong City Council. The Department also advertised the public exhibition in the Sydney Morning Herald, Sydney Daily Telegraph and Wollongong Advertiser on 28 July 2010 and notified landholders and relevant State and local government authorities in writing.

The Department received 27 submissions during the exhibition of the EA - 5 submissions from public authorities, being Wollongong City Council, Roads and Traffic Authority, NSW Health, Transport NSW and South Eastern Sydney Illawarra Area Health Service (SESAHS) and 22 submissions from the general public.

A summary of the issues raised in submissions is provided below.

4.2 PUBLIC AUTHORITY SUBMISSIONS

Within the submissions received, concerns were raised primarily from Council, Transport NSW and the RTA in relation to the FSR non-compliance, bulk and scale of the development, pedestrian access and linkages to the site and surrounding infrastructure (Wollongong Public Hospital, railway station and bus stops), traffic and parking, environmental and residential amenity impacts and heritage impacts. General support was provided from SESAHS.

4.2.1 Wollongong City Council

Council's submission emphasised its general support for the proposal, noting the significant social and economic benefits that are anticipated to be generated for the Wollongong and Illawarra Region. Notwithstanding its support, a number of matters were identified that Council recommended would require further investigation. Council's comments are summarised below:

Planning

- Consideration should be given to *Wollongong Local Environmental Plan 2009* (WLEP), *Wollongong Development Control Plan 2009* (WDCP) and *Wollongong Section 94A Development Contributions Plan 2009*.
- It is noted that the permitted FSR exceeds that permitted by WLEP. The consent authority must be satisfied that the proposal meets the requirements of clause 4.6 of WLEP. Council considers that the Proponent has not satisfied this clause and suggests the proposed departure would adversely affect the integrity of WLEP and application of the development standard; and
- Consideration should be given to existing site encumbrances.

Safety and Crime Prevention

- A safety audit report in accordance with 'Crime Prevention Through Environmental Design' guidelines should be prepared and details of security systems to be installed should be provided prior to the issue of a Construction Certificate; and
- Lighting to public areas to be in accordance with Australian Standards.

Landscaping

- A final landscaping plan should be prepared that complies with WDC; and

- The Proponent is responsible for the construction of footpath paving for the entire frontage of the development (levels to be obtained from Council) and street tree planting to Urunga Parade.

Environmental Impact

- Consideration should be given to:
 - o Classification of excavated fill material and stormwater management during excavation;
 - o Operational waste and noise from building use;
 - o NSW DECCW Guidelines for hours of construction;
 - o Lighting and façade reflection impacts on adjoining residents, pedestrians and motorists; and
 - o Stormwater quality management.

Health

- Must comply with the requirements of *Australia New Zealand Food Standards Code* and *Food Service to Vulnerable Persons Food Safety Scheme*, under the *Food Regulation 2010*; and
- Compliance with the relevant Australian Standards and NSW Food Authority requirements for the fit out of food premises and obtain the relevant licence.

Social Impact

- Consideration should be given to the preparation of a Social Impact Assessment.

Public Domain and Civil Works

- All civil works to comply with Council's Subdivision Code;
- Relevant consent to be obtained from utility supplier in the event any adjustments to public utilities is required; and
- Prior approval required for public road or footpath closures.

Geotechnical

- In accordance with the submitted geotechnical report, it will be necessary for all earthworks, drainage, retaining wall and foot construction to be undertaken with geotechnical supervision;
- All cut faces to be supported during and after construction to ensure adjoining development is not adversely affected; and
- To minimise noise and vibration impacts from hard bedrock excavation, geotechnical consultant to advise on rock excavation techniques.

Traffic

- Traffic report appears not to take into consideration the right turn peak period ban from Crown Street. The existing ban and New Dapto Road medium will generate a number of circuitous routes to the proposal;
- SIDRA electronic files should be assessed to check assumptions;
- Urunga Parade access does not comply with AS2890.1. All vehicular access, car parking and services areas should be provided in accordance with AS2890;
- Adequate pedestrian access should be provided from Crown Street;
- The proposed drop off bay capacity appears insufficient for the proposed courtesy bus and is shown very close to the ground floor building line;
- Bicycle parking should be consolidated to the first basement level to minimise bicycle traffic on car park ramps. Visitor bicycle parking should be provided in an accessible location on the ground floor;
- The pedestrian overbridge to the GP centre appears redundant given proposed escalator access;

- The surrounding area experiences a high demand for long stay parking. Paid or otherwise, controlled car parking should be considered to prevent all day parking abuse;
- Any redundant driveways should be removed; and
- Any traffic signs, line markings or other facilities will require submission to Council's Traffic Committee for approval prior to commencement of works.

Stormwater

- The method of stormwater connection to Council's infrastructure in Crown Street is unsatisfactory. Acceptable methods must be in accordance with WDCP;
- Provision shall be made to minimise stormwater run-off entering the basement car park;
- The landscape plan shall consider the locations of stormwater pits and pipelines;
- The location of the debris control rack is unsatisfactory and shall be revised so discharge is not directed to the debris screen chamber;
- Details of subsoil drainage to be provided to address the recommendations of the geotechnical report submitted with the EA; and
- Section details of pit C-2 shall be provided to enable assessment of outlet system.

Heritage

- Council does not agree with the conclusion of the submitted Heritage Impact Assessment that the development will not significantly impact on the significance of the adjoining heritage item. The impacts should be clearly stated and acknowledged and assessed in accordance with WDCP;
- The proposals FSR non-compliance is likely to further impact on the heritage item; and
- The proposed development generated a request to give consideration to the existing Cram House on site (proposed to be demolished) and that any approval be conditioned to require the installation of an interpretive panel providing a brief history of the site and its evolution and consideration be given to naming a ward in honour of the Cram Family.

Conclusion

- It is considered the proposal has merit, though further investigation and/or project refinement is required prior to approval. Should the project be approved, it is recommended that conditions be imposed addressing Council's comments above.

4.2.2 Roads and Traffic Authority (RTA)

The submission from the RTA raised no objections to the proposal, but provided comments in relation to vehicular access and the proposed construction of a signalised intersection. The RTA's comments are summarised below:

- At a meeting between Council, RTA and the Proponent's consultant on 10 February 2010, it was suggested that access to and from the proposed development site to Crown Street be physically restricted to left in/left out through the installation of a central median and associated pedestrian fence;
- Crown Street is a State Classified Road and the RTA has previously advised that in accordance with SEPP (Infrastructure) 2007 that any potential vehicular access to the site should occur via local road network (Urunga Parade);
- Notwithstanding this, traffic counts should be undertaken with the projected development traffic for the proposed signalised intersection to assess if the proposed signals meet the warrants for traffic signals as outlined in the RTA's *Traffic Signal Practice Design 1999*.

- Should warrants be met, PARAMICS modelling is to be undertaken of the proposed signalised intersection and surrounding network to assess the impact of the proposed signals on the surrounding intersections. The modelling shall consider the effect of internal delays from car parking boom gates; and
- Should warrants not be met for the provision of traffic signals, RTA and Council issues surrounding vehicular access to the site will require reassessment.

4.2.3 NSW Health

NSW Health noted that the Private Health Care Unit licences private health facilities under the *Private Health Facilities Act 2007* and monitors compliance by the licensee. NSW Health had no comment on the proposal, but advised a licence application under the *Private Health Facilities Act 2007* had not yet been received and without an application cannot provide further comment.

4.2.4 Transport NSW

Within the submission provided by Transport NSW, support was given for the co-location of complementary medical facilities and commitment to implement a sustainable travel plan. However, they noted that the following issues required further consideration:

- Increased opportunities to significantly improve pedestrian access through the redesign and/or relocation of the main entrance to provide additional pedestrian entrances and links to the adjacent public hospital, railway station and bus stops;
- Opportunity for dedicated taxi ranks and details of proposed courtesy bus;
- Opportunities to improve existing bus stops on Crown Street and New Dapto Street to improve access and safety;
- Provision of better bicycle parking and amenities in convenient and well-signed and safe locations, with provision for visitor parking adjacent to entrances;
- Construction Management Plan to address impacts to pedestrians and cyclists during construction and provide measures to encourage workers to travel to the site by public transport; and
- The Work Place Travel Plan and Sustainable Travel Plan included in the draft Statement of Commitments should be integrated and be replaced by a single Sustainable Travel Plan to reduce confusion and improve implementation.

4.2.5 South Eastern Sydney Illawarra Area Health Service (SESIAHS)

Following a review of the proposal, including the service profile, the SESIAHS raised no objections and provided their general support.

4.3 PUBLIC SUBMISSIONS

A total of 22 submissions were received from the public. Of the public submissions received, 19 (86%) objected to the project and 3 (14%) did not object but raised concerns. The key issues raised in public submissions are listed in Table 1.

Table 1: Summary of Issues Raised in Public Submissions

Issue	Proportion of submissions (%)
Impacts on existing street network (e.g. Crown Street and Urunga Parade)	36%
Impacts on local street parking and impacts from proposed 'paid' car parking	36%
Over servicing Wollongong and inadequate location – should be relocated	36%

Issue	Proportion of submissions (%)
Bad idea	27%
FSR non-compliance / overdevelopment	23%
Operational impacts	23%
Community objection to paying for Private Health – need more public services	23%
Misleading nature of university teaching functions	23%
Not community focused health care service	23%
Unfeasible development proposal	18%
Construction impacts	9%
Proposal for 24hour Medical GP centre better	9%
Inappropriate zoning	5%
Unacceptable precedent	5%
No NSW Health Licensing	5%
Impacts on existing Wollongong Public Hospital Helipad	5%
Business name infringements	5%

The Department has considered the issues raised in submissions in its assessment of the project.

4.4 PROPONENT'S RESPONSE TO SUBMISSIONS

On 13 December 2010, the Proponent provided a response to the issues raised in submissions (see Appendix C). The response included a PPR which addressed the issues raised during the exhibition of the project and provided further justification for the project and its design and provides the final Statement of Commitments for the proposed development. Key changes to the proposal as outlined within the PPR to address the comments and concerns raised include:

- Reduction in development proposal from FSR 3.83:1 to 3.69:1;
- Reduction of Ground Floor GFA, relocating the GP centre to Level 1 and provision of new front entrance to Crown Street and provision for ancillary retail space;
- Increase in height between ground floor and Level 1 to improve the height clearance of the undercroft area and provide an enhanced site line to adjoining heritage item;
- Urunga Parade setback of Levels 3 and 4 increased slightly to reduce GFA and provide greater articulation to the Urunga Parade façade;
- Increased setback to the north-western corner of Levels 5 to 7;
- Redesign to Urunga Parade façade to provide greater articulation;
- Redesigned north-western corner fire stairs recessed into the building to reduce bulk and increase articulation in building façade;
- Preparation of a Car Park Management Plan and new commitment for its implementation;
- New commitment to prepare a Construction Noise and Vibration Management Plan for implementation;
- New commitment to undertake dilapidation surveys of all adjoining properties in addition to surrounding public infrastructure; and
- New commitment to acquire necessary operational approvals prior to the operation of the development.

In addition to the above changes and at the direction of the RTA, the Proponent undertook additional analysis of the impact of the proposed development on the surrounding road network, particularly the traffic impacts associated with the installation of a signalised intersection at Crown Street and Staff Street. The report prepared provided further calibration and validation of the PARAMICs Model, highlights traffic impacts resulting from the proposed development and associated access arrangements and the consideration of the impact from the proposed boom gates at the entrance and exit of the proposed car park. The result and outcomes of the further analysis are considered further in the assessment of the project (Section 5).

5. ASSESSMENT

The Department considers the key environmental issues for the project to be:

- Built Form and Urban Design;
- Transport;
- Suitability of Private Hospital;
- Environmental and Residential Amenity;
- Heritage;
- Ecologically Sustainable Development; and
- Public Interest

5.1 BUILT FORM AND URBAN DESIGN

5.1.1 Design Evolution

In 2007, a previous Proponent had originally sought a declaration under Part 3A of the EP&A Act for a private hospital proposal on 360-364 Crown Street only, proposing a maximum building height of 43.2m and a maximum FSR of 6.53:1 (or 32,558sqm). Accordingly, the Department wrote to the Proponent advising them of the excessive nature of the proposal and that these issues would need to be appropriately addressed prior to any consideration of the proposal. It was suggested that the acquisition of adjoining properties be explored in an effort to reduce the scale and intensity of the development.

In response to the Department's correspondence, additional properties, being 9 and 11 Urunga Parade, were acquired in early 2008. However, the design still displayed significant non-compliances with the then *Wollongong City Centre LEP 2007*. In late 2008 the Department advised the Proponent that the Director-General had formed the view that the proposal could be considered under Part 3A of the EP&A Act, though strong concerns were retained regarding the non-compliances with the overall building height and FSR controls in Council's LEP. The preliminary environmental assessment included a building design that sought to reduce the overall building height to comply with the maximum 32m, but still proposed a FSR well above that permitted by the LEP (i.e. 3:1). An FSR of 4.15:1 was proposed, representing a total GFA of 20,694sqm.

Following the issue of the Director-General's Requirements for the proposal, the Proponent submitted an EA that further amended the design, reducing the FSR to 3.83:1 (or 19,095sqm).

Following exhibition and comments provided by the Department, further amendments to the design of the hospital were proposed in the PPR, reducing the floor area on a number of levels in order to provide greater articulation within the facades of the building. As a result of the amendments, the FSR was reduced to 3.69:1, representing a GFA of 18,390sqm. While the proposed FSR still does not comply with clause 4.4A of WLEP, this represents a reduction in the GFA of approximately 14,200sqm from that which was originally proposed in 2007.

5.1.2 Bulk and Scale

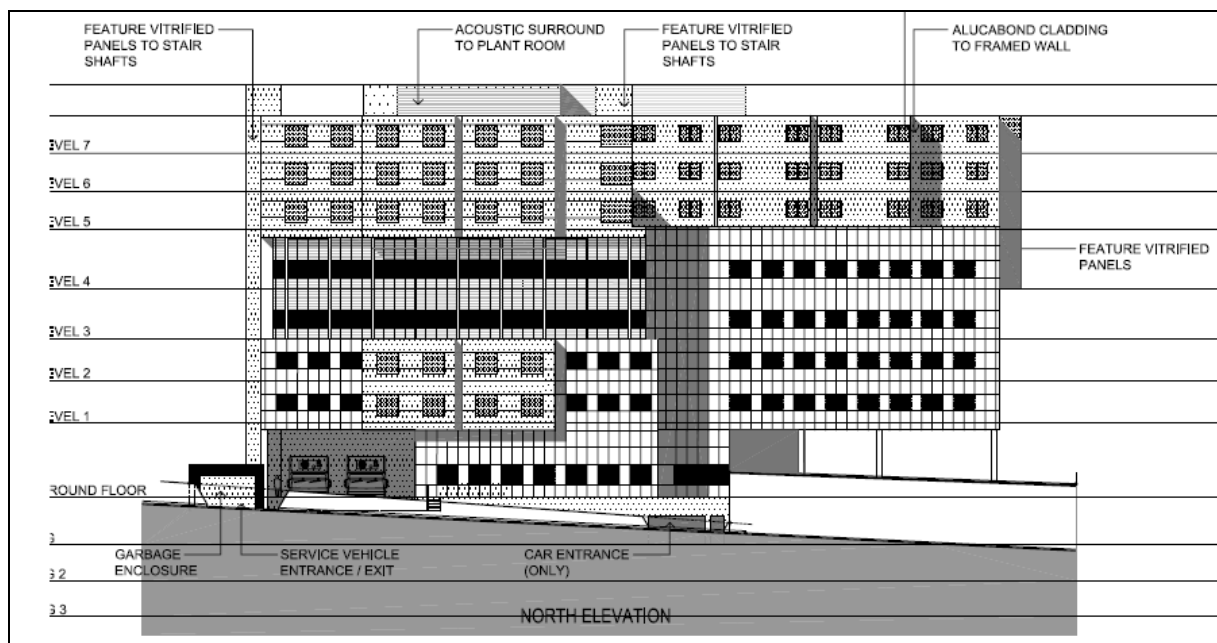
The proposal involves the development of a new 8 storey building containing a total GFA of 18,390sqm, with a maximum building height of 32m to the top of the plant and equipment on the roof level. The mass of the proposed development is configured in an 'L' shape on the subject site, with frontages provided to both Crown Street and Urunga Parade.

In addressing the proposed non-complying FSR of 3.69:1, the Proponent has considered clause 4.6 of WLEP, concluding that compliance with the development standard is

unreasonable and unnecessary and that the proposed development is justifiable based on a number of grounds, including:

- The co-location of the proposal with Wollongong Public Hospital would improve operation efficiencies and patient amenity and complement each other in terms of expansion of existing services and provision of new ones;
- The proposal is in the public interest and is consistent with the SP1 Special Activities zone objectives, which encourages the establishment of new medical and health facilities, as envisaged by Council's rezoning of the subject site and surrounding land from residential;
- The design of the proposed hospital has undergone a number of design reviews, wherein the amended design as submitted with the PPR, provides the minimum GFA to enable the delivery of the services proposed without the proposal becoming unfeasible;
- The proposed building complies with the maximum 32m height control and is of a comparable bulk and scale for the locality based on design elements such as setbacks and minimal shadow impacts;
- The proposal will provide a number of complementary and additional medical and health services that are currently unavailable within the Illawarra Region;
- The proposal will provide for a new signalised intersection at Crown Street and Staff Street that will provide safe vehicle and pedestrian movements;
- The hospital will deliver on improved public domain in accordance with the City Centre Public Domain Technical Manual, including new landscaping, footpath paving and vibrant activated streetscape; and
- The proposal will provide for ground floor ancillary retail floor space to activate the ground floor of the hospital.

Figure 15: Urunga Parade Elevation



The building podium is satisfactorily setback 6m from the adjoining western boundary and between 6-8m from the adjoining eastern boundary, except for the proposed waste and oxygen facilities which are proposed adjacent to the eastern boundary for a length of approximately 11m. The staggered Crown Street building frontage is setback a minimum 4m, while the rear Urunga Parade frontage is setback a minimum 6m. Above the podium, the

mass of the upper tower levels have been designed with greater setbacks between 6m and 12m and stepped inwards. The building design feature at the south-eastern corner of the building is provided with varying setbacks between 2.4m and 4m, which in combination with the building finishes creates a key focal point for the building (see Figure 21).

Concerns were raised with respect to the scale of the proposal, particularly at the rear fronting Urunga Parade and north-western corner of the development and its proximity to adjacent properties. In response, the rear fire access stairs on the western elevation were recessed further into the building, providing for a greater setback of 9m of the upper levels from the adjoining property and reduction in the building's bulk at this edge. In addition, amendments were also undertaken to the rear Urunga façade of the proposal to increase the articulation and break up of the blank façade (see Figures 15 – 17). In doing so, the Proponent has also reduced the floor area on particular levels to assist in reducing the level of FSR non-compliance.

Figure 16: Urunga Parade Photomontage – westerly view



Figure 17: Urunga Parade Photomontage – easterly view



The FSR objectives outlined in clause 4.4 of WLEP seek a correlation between the size of the site and extent of development on that site, for consideration to be given to the available infrastructure and generation of vehicle and pedestrian traffic, and to ensure development is of a comparable bulk and scale for the locality.

In this respect, the proposal is of a comparable building height and scale to that of the 9 storey Wollongong Public Hospital, particularly in relation to the massing of the hospital adjacent to Crown Street (see Figures 18 – 20). The transition of materials used within the

building, design features and façade treatments, including the glazed blade element and corner feature element, help to reduce the bulk and scale of the development, breaking up the mass of the building's façades, while providing a built form that expresses a new modern private hospital.

Figure 18: Wollongong Public Hospital– easterly view



Figure 19: Crown Street Photomontage – westerly view



Figure 20: Crown Street Photomontage – easterly view



It is considered that the proposed development is appropriately scaled within the context of the surrounding development and has been designed to reduce impacts on the adjoining and surrounding properties, whilst ensuring that the proposal provides a strong presence and adds to the Crown Street streetscape. Further, the proposal has appropriately considered the potential vehicular and pedestrian traffic to be generated by the development, proposing a new signalised intersection at Crown Street and Staff Street that will not only provide safe access to the proposed development, but facilitate improved vehicular and pedestrian movements from Staff Street.

Consideration has also been given to the correlation between the extent of development proposed and the site to be developed, with additional properties having previously been acquired to increase the site area for the development, providing the opportunity for increased building setbacks and greater articulation to reduce the associated bulk and scale impacts. Further, the development height was reduced prior to the lodgement of the EA, so as to comply with the maximum 32m height control.

The Department considers the proposed bulk and scale of the proposed development to be acceptable within the context of existing surrounding development and to be consistent with the vision of the medical and health precinct and SP1 Special Activities zoned land. The proposed development complies with the maximum 32m height control, and the proposed 3.69:1 FSR, whilst not complying with the current density permitted under WLEP, has been justified by the Proponent, with the final hospital design the result of a number of amendments. The variation to the FSR is acceptable under the circumstances and will not result in any significant impacts to the surrounding built environment.

5.1.3 Urban Design

The key design attribute of the proposed development is the treatment of the Crown Street façade to address the principal street frontage, orientating the main aspects of the proposal to this elevation, including the main vehicular entrance, pedestrian entrance and ancillary retail ground floor activities.

Figure 21: Crown Street Frontage



These design features will assist in activating the Crown Street frontage, while the introduction of a key design focal point, being the upper eastern red corner of the proposal (see Figure 21), will provide the hospital with a sense of address to Crown Street.

In this respect, the built form of the proposal assists in defining the street edge which, in conjunction with the existing Wollongong Public Hospital, will strengthen the 'Hospital Hill' character of the surrounding SP1 Special Activities zoned area. The use of different materials and finishes in the building design (glazing), different built form elements (setback curved upper levels and red corner element) and proposed landscape scheme, assist in breaking up the façade of the development and further minimise the scale of the building when viewed from street level and provide an active streetscape.

The Department is satisfied that the proposal has incorporated a variety of elements to ensure that the proposal is appropriate for the existing setting and to help reduce potential impacts on the adjoining built environment. The proposal is consistent with the current and projected future character of the medical and health precinct and will add to the visual interest and activity of the precinct and surrounding area.

5.2 TRANSPORT

5.2.1 Traffic Impacts

Construction

The Proponent notes that matters surrounding construction management have not yet been finalised as a contractor for the proposal is yet to be appointed. A commitment has been provided by the Proponent to ensure details surrounding construction access arrangements, material deliveries and traffic management are satisfactorily addressed prior to the issue of a Construction Certificate for the proposal. In this respect, the Proponent has agreed to the preparation of a Construction Management Strategy for the development and will include the preparation of a Construction Traffic Management Plan as part of the proposals overall construction and site management approach. The plan is proposed to be prepared in consultation with Council and will address:

- The measures to be implemented to minimise and manage construction parking and traffic impacts and appropriate contingency measures; and
- Include a Local Development Management Plan to address how the development would be managed to minimise impacts on the remainder of the locality.

Furthermore, the Department has also recommended a condition requiring the preparation of a construction management plan, which reinforces the Proponent's commitment, to be developed in consultation with the RTA and Council. In this respect, the Department is satisfied that construction traffic from the proposed development will be satisfactorily managed during the development to ensure minimal impacts arise.

Operational

Submissions received from the RTA and Wollongong City Council during DGR consultation, raised objections to the access for the development being provided from Crown Street. Council advised that access to the site should occur via the local road, being Urunga Parade, while the RTA advised that they do not support access to the site via Crown Street given the strategic significance of Crown Street as a State Classified Road. The RTA advised further that this approach was consistent with Clause 101 of SEPP (Infrastructure) 2007, which seeks to ensure that new development does not compromise the effective and ongoing operation of classified roads and to prevent or reduce classified road traffic impacts on adjoining development.

Following the initial response, a meeting was held between the Proponent, RTA and Council in early February 2010 to discuss the proposal in greater detail, including a preliminary design that included a left turn deceleration lane for access. Further, the RTA advised that access to the development site be restricted to left in/left out by way of a central medium and pedestrian fencing on Crown Street.

In response to comments received, a final design option was prepared for the EA that proposed vehicular access to the site from Crown Street via a new signalised intersection at Crown Street and Staff Street and secondary entry only access from Urunga Parade at the rear of the development. During exhibition of the project, the RTA reiterated their initial position that, in accordance with Clause 101 of SEPP (Infrastructure) 2007, access to the site should be provided via the local road network, being Urunga Parade. Notwithstanding their initial position, the RTA further advised that traffic counts and PARAMICS modelling should be undertaken of the projected traffic generated by the development and to assess whether warrants would be met for the provision of a new signalised intersection.

Accordingly, the Proponent undertook further analysis and modelling of the proposed signalised intersection to assess the effects of traffic generated by the project on the surrounding road network and to demonstrate that the provision of new traffic signals at the intersection of Crown Street and Staff Street would ensure that Crown Street, as a State Classified Road, would continue to operate in a safe and efficient manner (see Figure 22).

Figure 22: PARAMICS Model Network



The results from the modelling indicate that the surrounding road network will continue to operate satisfactorily during both the AM and PM peak periods, with only minor increase to delays on New Dapto Road experienced during the PM peak period. Traffic projections for the road network in 2020 were also modelled which demonstrated that the network is capable of accommodating the overall increase in traffic, but increases to traffic delays on New Dapto Road were predicted. Consideration was also given to the proposed basement car park boom gates, with time delays modelled to mimic boom gate operations. It was found

that during both the AM and PM peak periods, queuing for entry and exit manoeuvres, satisfactory queuing space was provided at entry boom gate location.

The completed PARAMICS modelling was referred to the RTA for review which advised that the proposed signalised intersection at Crown Street and Staff Street would not have an unacceptable impact on the efficiency of the local and classified road networks. The RTA noted that the queuing modelled on Crown Street and surrounding side streets was considered acceptable and that the RTA would not object to the major project, subject to the imposition of recommended conditions. Key requirements of the recommended conditions include:

- The Proponent entering into a Works Authorisation Deed (WAD) for the required road works/traffic control facilities;
- The proponent upgrading the junction of the site access with Crown Street and Staff Street west to provide traffic signals with a no right turn restriction from Crown Street into the proposed development;
- The relocation of the Crown Street exit boom gate a further two car lengths into the site to improve queuing space available; and
- The relocation of the Crown Street entry boom gate further east into the site to improve queuing capacity by deleting parking spaces 87 and 88.

The Department is satisfied that the proposed development will not have an unacceptable impact on the existing road network. The proposed intersection would also provide a number of road operational benefits to the proposal. These include:

- The signalised intersection will ensure that traffic impacts on the surrounding local network, particularly Urunga Parade, are minimised, with 'entry only' access proposed via this local street;
- Suitable queuing space is proposed within the basement car park, to ensure that the new signalised intersection will provide safe entry and exit to the site, whilst ensuring that the efficiency of both Crown Street and Urunga Parade are maintained;
- Alleviating delays to the existing east – west traffic movements along Crown Street in conjunction with the RTA's recommended 'no right turn restriction' from Crown Street into the proposed development;
- The proposed signalised intersection would provide safer entry for vehicles into Crown Street from Staff Street; and
- The proposed signalised intersection would have a positive effect on the safe movement of pedestrians within the existing medical precinct.

5.2.2 Public Transport

The subject site is located within close proximity to a range of public transport services, including Wollongong Railway Station and existing bus services along Crown Street that provide a good level of service between Wollongong CBD, Wollongong Hospital and surrounding areas.

In addition to existing public transport a good level of existing pedestrian connectivity is provided within the surrounding street network. A series of signalised intersections also provide pedestrian routes between the subject site and existing public hospital. Further, the PPR provided an amended Crown Street elevation to provide direct access for pedestrians from Crown Street. This will assist in reducing any potential conflicts between vehicles and pedestrians during operation.

The co-location of the proposal within proximity of the existing Wollongong Public Hospital will support and strengthen demand for existing public transport services. The Proponent has committed to the preparation of both a Work Place Travel Plan and a Sustainable Travel

Plan. Comments provided by Transport NSW recommended that only one document be prepared to reduce confusion and improve its implementation and effectiveness. Accordingly, a condition is recommended requiring the preparation of a Sustainable Travel Plan, which integrates the commitments of the Work Place Travel Plan, in consultation with Transport NSW, Council, RTA and other stakeholders. In particular, the Sustainable Travel Plan will include the following:

- Measures to reduce vehicle movements;
- Measures to encourage public transport uses;
- Measures to improve accessibility to surrounding medical precinct and public transport services;
- Encouragement of cycling through the provision of safe and secure parking and amenities;
- The provision of appropriate on-site parking provisions;
- Consideration of options to increase public transport services;
- The provision of shuttle bus services (not to be provided only where evidence of suitable public transport options are available);
- Details of any shuttle bus service, including routes, times and ensuring appropriate connections are made to other public transport options; and
- Review and monitoring mechanisms.

The Department considers the existing public transport services available will satisfactorily service the proposed development, which will be further supported by the Proponent's commitment to establish a shuttle bus service. Further, the proposed construction of a signalised intersection at Crown Street and Staff Street would provide improved pedestrian connections from the development to the southern side of Crown Street and existing bus services. In addition, the implementation of a Sustainable Travel Plan in consultation with Transport NSW, Council and the RTA, will ensure that public transport use is encouraged and supported by the relevant authorities.

5.2.3 Parking

The proposed development made provision for 324 off-street car parking spaces within three basement levels, including 12 accessible parking spaces located adjacent to the lifts for improved access and 7 at-grade spaces beneath the undercroft on the ground floor. Provision is also made for bicycle and motorcycle parking within the basement levels. Access to the basement is proposed from both Crown Street, via a two-way access ramp and entry-only access ramp from Urunga Parade at the rear. Access to the proposed at-grade parking area and drop off bay is integrated with the proposed signalised Crown Street access point.

RTA comments provided in response to traffic modelling undertaken for the proposed signalised intersection have recommended modifications to the locations of the proposed car park boom gates, resulting in the deletion of approximately 3 car parking spaces. This will result in a total of 321 car parking spaces being provided (subject to conditions), but provide improved traffic flow for vehicles exiting the proposed development during a signal phase.

The Proponent's EA details that a review of the peak parking demand of similar developments and the application of the RTA Guidelines specifically for the hospital component, generates the requirement for approximately 330 car parking spaces. In this regard, the proposed 321 spaces (reduced subject to RTA conditions) are considered acceptable, considering the proposal will also make provision for both motorcycle and bicycle parking. Further, the site is located within approximately 800m of Wollongong Railway Station and existing bus services that operate along Crown Street.

The proposed location of bicycle parking spaces on all basement levels may result in unnecessary conflict with other vehicles moving through the basement levels. Further, no spaces have been provided for visitors and minimal details have been provided in relation to the provision of staff amenities for those choosing to cycle or walk to work. Accordingly, recommended conditions are proposed to ensure that all staff bicycle parking is consolidated to Basement Level 1 to minimise conflict, for visitor bicycle parking to be provided at ground level, and that appropriate staff amenities and showers are provided.

The Proponent outlines that access to the basement car park will be controlled with boom gates located at entry points, with queuing capacity for 7 vehicles at the Crown Street access and queuing capacity for 2 vehicles on Urunga Parade provided. Concerns were raised within some public submissions that hospital staff will avoid paying for parking and therefore park within the surrounding local street network.

As observed during the Department's site inspection of the proposed development, the conditions of the existing on-street parking provisions (minimal spaces available and 2 hour limit) will contribute to the use and uptake of controlled car park proposed within the development.

The Proponent's PPR notes that the fee structure to for the proposed development car park will be similar to that of Wollongong Public Hospital, with some concessions available to staff working late at night or patients of clinics. In addition to the controlled basement car park, 5 minute car parking spaces are proposed adjacent to the entry foyer, at no cost, providing set down/pick up opportunities for visitors, patients and staff. The provision of this area will supplement the proposed longer term parking.

As noted above, the Proponent has committed to the preparation and implementation of a Sustainable Travel Plan (including an integrated Work Place Travel Plan) that will include options to increase public transport use and alternative means of transport, such as walking and cycling. In addition, the Proponent has prepared a Car Park Management Plan and committed to the implementation of the Plan's operational requirements to adequately control and manage the demand for on-site car parking and encourage the use of alternative modes of transport to travel to and from work.

The Department is satisfied that the car parking provisions included within the proposal are satisfactory and, in conjunction with the existing public transport provision and commitments provided by the Proponent, will sufficiently service the proposed development.

5.3 SUITABILITY OF PRIVATE HOSPITAL

Concerns were raised, by both the Department and within public submissions, in relation to the operational characteristics of the proposed hospital. Key concerns were the justification and need for additional health services, the economic viability of the proposal and the role Wollongong University medical students will have in the day to day operations of the hospital.

5.3.1 Justification of Proposal

The Proponent's EA details that the consortium of doctors who own the subject development site had identified a future need for new hospital facilities given the population growth of the Illawarra Region and identified service gaps within the existing medical and health services available. Further, it was identified that there was a need to provide dedicated teaching facilities within a working hospital environment, which the current Wollongong Public Hospital is unable to provide. The EA identifies public health and socio-economic benefits, including the role the development will play in providing improved medical and health facilities and services, the generation of a sustainable number of jobs, both during construction and the operation of the future hospital and provision of dedicated teaching facilities.

The Proponent's PPR provides a detailed response to these issues, addressing the planning history of the site, the level of commitment from industry, the Proponent's history with the project and site and other events within the Illawarra Region. The PPR notes that prior to the current *Wollongong LEP 2009* SP1 Special Activities (Wollongong Hospital Precinct) zoning of the site and prior to the earlier *Wollongong City Centre LEP 2007*, the area surrounding the existing public hospital was identified for growth, with modelling of building masses undertaken to inform and assist in developing new FSR and height controls for the area.

The gazettal of the *Wollongong City Centre LEP 2007* was accompanied by the *Wollongong City Centre – Civic Improvement Plan 2007* which outlined the future potential growth of the health and medical precinct, noting that Wollongong Public Hospital has the highest bed occupancy rate of any in the State and that there was to be an expected emergence of new major health and medical developments on 'Hospital Hill' and growth predicted to double by 2031. The 2007 City Centre LEP gazettal rezoned the subject site and surrounding land from residential to SP1 Special Activities, providing an FSR bonus of up to 3:1 and a maximum building height of 32m for hospital related development. These revised planning controls display the clear intention from Council to cater for the future and increased demand for health and medical related development.

The succession to the *Wollongong City Centre Local Environmental Plan 2007* was the *Wollongong Local Environmental Plan (2009)*, gazetted in February 2010. The new LEP rezoned the subject site and surrounding land from SP1 Special Activities – Hospital and Medical Research and Development to SP1 – Special Activities (Wollongong Hospital Precinct). However, no changes to the existing 3:1 FSR and 32 metre building height controls were undertaken, reinforcing the original vision for the hospital precinct and Council's intentions on ensuring that development and growth opportunities for the SP1 Special Activities zone remain.

5.3.2 Hospital Viability

In response to concerns raised regarding the economic viability of the proposal, the Proponent provided further details to demonstrate the level of consultation that has taken place with industry.

Industry support has been obtained from Ramsey Health Care, wherein the site's superior proximity to the existing public hospital infrastructure and services would provide the potential for improved access to services and for the reduction of resource duplication, equipment and skilled staff. Further, it was noted by Ramsey Health Care that the positive location of the proposal adjacent to private health care would be attractive to health care providers and staff.

Further, additional details have been provided by the Proponent detailing the range of services proposed to be provided within Wollongong Private Hospital, which details that many of the services proposed to be established, are currently unavailable within the Illawarra Region, or there is an increased demand for such services, such as:

- A hyperbaric oxygen unit for the treatment of wounds and ulcers and post radiotherapy;
- Bariatric unit, to provide Illawarra based services;
- Cardiac unit with a cardiac intensive care, to allow for Illawarra based cardiac surgery;
- A hand/reconstructive unit to provide Illawarra based care and cater for the large amounts of heavy industry and associated incidents; and
- An integrated breast cancer unit to provide further advantages and services for the Illawarra Region.

In addition to the improved and new services proposed to be provided within the hospital, currently there is limited teaching undertaken within Wollongong Hospital, limiting the ability to train and teach future medical practitioners for the growing region. The proposal's university and teaching centre is envisaged to provide this essential service, which is further complemented by the location of the site within proximity to the existing Wollongong Public Hospital. Further, the Proponent has provided a copy of a letter of support from the Dean of the Wollongong University Graduate School of Medicine, who described the proposal as "...a bold and exciting plan..." and sought further involvement in the detailed design of the teaching space.

Notwithstanding the above, the Proponent is aware that the success of the proposal will be ultimately market driven, noting this as a key reason in seeking industry input and support from health care providers and others. Further, general support was provided from SESIAHS within their submission, while further review of the proposal and its detailed operations will be undertaken by NSW Health upon submission of an application for a Private Health Care Unit licence.

The Department is satisfied that the information provided by the Proponent within the EA and PPR justify the proposal's co-location adjacent to the existing public hospital on 'Hospital Hill' and that the establishment of a new private hospital will provide a range of new and complementary services to those that exist within the existing medical and health precinct to ensure that the proposal viable and successful. The Department notes the in-principle support by health services and the need for further licensing requirements prior to operation of the proposal. Based on the information provided, a condition has been recommended that will require the proposal to acquire the necessary licensing and approvals from NSW Health prior to the construction commencement and operation of the development.

5.4 ENVIRONMENTAL AND RESIDENTIAL AMENITY

5.4.1 Overshadowing

Currently, the existing development occupying the subject site has minimal impacts on adjoining and surrounding properties given the low scale of existing buildings. Surrounding land uses adjacent to the site and along Crown Street primarily reflect the SP1 Special Activities – Wollongong Hospital Precinct zoning, with a number of medical centres and health related commercial premises established within these sites.

The north/south orientation of the proposed development results in shadows cast affecting those existing properties to the south of the subject site, particularly during the winter solstice (see Figure 23), being an existing service station, vacant allotment (currently utilised for informal car parking), medical centre, professional consulting room establishment and some vacant commercial premises. The shadow modelling submitted by the Proponent satisfactorily indicates that greater than 3 hours of solar access can be maintained to adjoining properties.

Figure 23: Winter Shadow Diagrams



During the equinox and summer solstice, the proposal will have minimal impacts, with the adjoining and surrounding properties maintaining over a minimum of 4 hours of direct sunlight access (see Figures 24 and 25). In this respect, the Department considers that the overshadowing generated by the proposal to be acceptable.

Figure 24: Equinox Shadow Diagrams



Figure 25: Summer Shadow Diagrams



5.4.2 Noise and Vibration

Construction

The Proponent's EA advises that noise and vibration may occur during the construction of the proposed development. Accordingly, the Proponent has committed to the preparation and implementation of a Construction Management Strategy, which includes a Construction Noise and Vibration Management Plan that will identify noise goals and measures to be implemented during construction to ensure that noise and vibration levels generated are kept within the relevant criteria. The plan will also provide scheduling for works to minimise impacts on sensitive receivers. Additionally, the Department has recommended a condition requiring the submission of a detailed Construction Management Plan that will require construction noise and vibration to be appropriately addressed prior to the issue of a construction certificate for the proposal.

Operation

Within the Proponent's Environmental Noise Assessment, key noise sources identified from the operation of the proposed development included mechanical plant and equipment, on-site traffic and loading activities. In this regard, it was assessed that the noise levels generated by the use of the basement car park are satisfactory and will have minimal impact on adjacent properties. In response to the proposed location of the loading dock adjacent to an existing residential property, a recommendation has been made and committed to by the Proponent, to construct a 2.1m high fence adjacent to the loading dock to mitigate any noise impacts from its use.

The report also notes that specific details of mechanical plant and equipment are yet to be selected, of which will be undertaken at construction certificate stage. However, it was noted that all plant and equipment can be appropriately treated to ensure that noise emissions are reduced. A commitment has been provided to prepare a detailed noise assessment of all mechanical plant and equipment prior to the issue of a construction certificate for the

development, where necessary acoustic treatments will be identified and implemented accordingly.

The Proponent's submitted Environmental Noise Assessment report has identified the medium to heavy traffic levels on Crown Street (Princes Highway) as a noise source that has been considered in relation to its impact on the hospital and associated functions. In this respect, building façade elements such as windows and doors were identified as potential areas where noise transfer could occur. Accordingly, the report recommends the use of medium to heavy single glazing for windows and acoustic seals to ensure that hospital rooms are appropriately treated.

The noise impacts generated and exposed to during the operation of the development have been appropriately considered and addressed by the Proponent. In addition to the recommendations provided within the Proponent's Environmental Noise Assessment report, the Proponent has committed to identified maximum noise limits, and the submission of a noise validation report to validate the noise levels generated by the operation of the hospital and to demonstrate compliance. Further, recommended conditions are proposed by the Department requiring the preparation of a construction noise and vibration management plan prior to the issue of a construction certificate for the development and the requirement for a building report to be prepared by a qualified acoustic engineer confirming that all plant and equipment has been satisfactorily installed to ensure it complies with the relevant noise criteria. Based on these requirements, the Department is satisfied that the proposal will not have a detrimental impact on surrounding sensitive receivers, including the adjoining residential land uses.

5.5 HERITAGE IMPACTS

As part of the EA, the Proponent has submitted a Statement of Heritage Impact to assess the impact of the proposed development on the adjacent heritage item, at 366 Crown Street (see Figure 25), in accordance with the guidelines set out by the NSW Heritage Office publication *Statements of Heritage Impact 2002* and WDCP controls for development near heritage items. The dwelling is identified within WLEP as being an item of local significance and is currently being used as a health professional consulting room. As detailed within the *City of Wollongong Heritage Study 1991*, the subject heritage item is identified as a good example of Federation domestic design.

Figure 25: Local Heritage Item - 366 Crown Street



The Proponent's Statement of Heritage Impact notes early consultation and consideration of the adjacent heritage item had allowed for impacts on its significance to be appropriately addressed and integrated into the design of the proposal, stating that there are no aspects of

the proposal which could significantly and detrimentally impact on the significance of the heritage item.

Figure 26: Visual Catchment of Local Item



Council's submission raised concerns with the Proponent's Statement of Heritage Impact, stating that the proposal will have an impact on the significance of the item and that these impacts should be clearly identified and addressed. Further, Council noted that the proposal should be assessed in accordance with the requirements of Council's *Development Control Plan, Chapter E11: Heritage Conservation*, in particular:

- The impact on the views to and from the item, including any necessary signage in and around the vehicular drop off area and building foyer;
- Overshadowing of the heritage item;
- Effect of the development on the ongoing viability of the heritage item; and
- The potential damage to the structure integrity of the existing heritage item.

Council's submission also included a request that consideration be given to the existing development on the subject site, being the Cram family residences and known as 'Cram House'. Whilst not having enough significance to warrant its retention, it has been requested that consideration be given to providing an interpretive panel within the hospital once completed and naming the hospital, a ward or other onsite facility in honour of the family.

The Statement of Heritage Impact acknowledges the development of an 8 storey building adjacent to any single storey building will have an impact. In this instance, the design of the proposal has responded to the significance of the heritage item by retaining the visual catchment of the existing item, providing screen planting to reinforce views from the item and articulating the western façade of the development to break down the bulk and appearance of the building to provide a more sympathetic backdrop to the item.

The identified visual catchment of the heritage item (see Figure 26), details the constraints generated by existing development adjacent to the item. The existing heritage item is setback further from Crown Street, reducing the visual catchment of the item and its prominence within the existing streetscape. This is further illustrated in Figure 27, which details the constraints from the scale and approximate 14m setback of the existing 2 storey former nursing home establishment on the subject site.

Figure 27: Streetscape Prominence of Heritage Item



The prominence of the existing heritage item does not become apparent within the existing streetscape until the bulk of the existing nursing home establishment is absent from the visual catchment. The Proponent notes that the existing visual catchment of the heritage item was considered at an early stage during the design of the proposal, with the development introducing the undercroft area at the ground level adjacent to the western boundary to retain the visual connections from Crown Street. Further, the impact of the development has been minimised by stepping down the bulk of the building towards the interface of the adjacent heritage item.

Furthermore, the Proponent's Statement of Heritage Impact provides an assessment and consideration of the WDCP's development controls for development in the vicinity of a heritage site. In this regard, the impact of the proposal on the visual catchment and its visual relationship with the existing heritage item have been satisfactorily addressed and considered, with the final design of the proposal reflecting these considerations. In addition, the overshadowing impacts on the adjacent item are considered satisfactory, with the property only affected during the morning, having full access to direct sunlight for greater than 3 hours per day. The viability of the existing item will not be detrimentally impacted upon, wherein the existing professional consulting room use, permitted within the SP1 Special Activities (Wollongong Hospital Precinct zone), will be further supported by the establishment of a hospital adjacent. In response to concerns raised regarding the potential impacts generated by works associated with the excavation of the 3 levels of basement car parking, the Proponent has provided a commitment to prepare a dilapidation report prior to the issue of any Construction Certificate for the proposal. Additionally, a condition is recommended by the Department requiring the dilapidation report to have regard to the adjacent heritage item to ensure no undue structural impacts occur to the existing building.

In response to the concerns raised by Council, the Proponent's PPR detailed minor amendments to the design of the proposal, increasing the height and clearance of the undercroft area from 4.3m to 6.2m, enhancing the line of sight and providing greater visual prominence of the existing heritage item. Whilst the PPR made no mention of Council's

request for consideration to be given to the history of the Cram Family, the request from Council is considered appropriate and not seen as hindering the development or its future operations in any way. Accordingly, a condition recommending that an interpretive panel be installed within the hospital once completed has been included to offer some context to the history of the site and its use for health related purposes.

The Department is satisfied that the proposal will not have a significant or detrimental impact on the existing heritage item and is satisfied that the design of the proposal has given due consideration to the heritage significance of the item, its visual catchment and views to and from the site and potential impacts on its future use and operation.

5.6 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

The proposed development will be undertaken on a previously developed site that contains a number of disused buildings and vacant residences. Investigations undertaken by the Proponent have concluded the site is not flood affected. The site is also highly unlikely to be detrimentally impacted upon by changing sea levels from climate change.

The proposed development will have both short term and long term positive impacts on the economic, environmental, social and equitable elements of the locality. The proposal will make provision for construction jobs and associated investment during the proposal's development and future operational employment opportunities and continued investment within the Wollongong Hospital Precinct.

The ESD report prepared by the Proponent notes that a four star green rating is achievable and that the proposal has been designed to meet the general requirements, expectations and recommendations of the *NSW Health Engineering Services and Sustainable Development Guidelines, Technical Series TS11*, including the consideration of the following sustainable development objectives:

- Comfortable and healthy indoor environment;
- Minimised non-renewable resource consumption and environment impacts; and
- Cost effectiveness over its whole life cycle.

The proposal has been designed to maximise its use and exposure to natural elements of the surrounding locality, initially investigating and incorporating a number of environmentally sustainable measures in the design and functionality of the building including:

- Building orientation;
- High performance glazing and internal shading;
- High thermal mass storage;
- Maximise rain water reuse to minimise potable water use and associated discharge;
- Installation of water metres to allow performance monitoring;
- Installation of 3 to 5 star rating fittings and fixtures;
- Use of adiabatic type coolers for heat rejection, utilising recycled rain water;
- Chilled water cooling system;
- Provision and installation of operable windows to maximise cross ventilation;
- Installation of digital control system and connection to building monitoring system;
- Installation of a small tri-generation plant to provide base power load for 24 hour sections of the hospital, with waste heat used for domestic water applications and space heating and cooling;
- Lighting automatic control system;
- Solar hot water system; and

- Waste management awareness and implementation of a waste management plan.

In addition to the above, the Proponent has committed to the preparation of a water and energy efficient program, preparation of a waste management plan and implementation of the ESD commitments outlined within the Proponent's ESD report.

The Department is satisfied that the Proponent has adequately considered the incorporation of ESD within the design, construction and operation of the development, with further commitments provided to ensure that initiatives outlined within the ESD report are investigated further during the detailed design of the building. The Department has recommended appropriate conditions to ensure that the proposal implements the recommendations made within the ESD report.

5.7 PUBLIC INTEREST

The proposed development will make a significant contribution to the existing cluster of medical uses that has been established within the proximity of the existing Wollongong Public Hospital. Further, the proposal will complement the envisaged growth and expansion of the Wollongong Hospital Precinct, and it will assist in meeting the current and future health service demands for the growing population of Wollongong and wider Illawarra Region. The project will attract over \$114 million worth of capital investment and will create approximately 300 full time operational jobs. Given that the residual impacts associated with the development can be mitigated, the Department considers the proposal to be in the public interest.

6. RECOMMENDATION

The Department has assessed the EA and considered the submissions in response to the proposal. The key issues relating to the proposal include: built form and urban design, transport, suitability of the private hospital, environmental and residential amenity, heritage, ecologically sustainable development and public interest.

The Department considers that the proposal has positively responded to the surrounding built environment and character of the surrounding medical precinct. The proposal would provide for new and complimentary medical and health services and reinforce the establishment of 'Hospital Hill'. The proposed design and façade treatment of the proposal responds to the surrounding built environment and compliments the bulk and scale of Wollongong Public Hospital, while ensuring the bulk and scale of the building is appropriately treated.

The proposal provides appropriate responses to mitigate potential impacts on the surrounding environment, residential amenity, transport and access. In addition, the proposal will provide a new signalised intersection that will assist in providing safe vehicular access to and from the site and also facilitate improved movements from Staff Street into Crown Street, subject to recommended conditions from the RTA. The Department has also recommended appropriate conditions in response to the key issues, including requirements for the submission of a construction management plan, noise and vibration management plan, implementation of ESD principles, requirement for the installation of an interpretive heritage panel, visitor bicycle parking and associated amenities for staff and visitors and the requirement to obtain the necessary NSW Health licences.

The Department sought comment from both the Proponent and Council on the draft recommended conditions. All comments where relevant have been incorporated.

The project is consistent with key objectives in the State Plan and Metropolitan Illawarra Regional Strategy and would provide significant public benefits to the broader community through the provision of a world class hospital and ancillary educational facilities, and when integrated with the surrounding medical land uses, particularly Wollongong Public Hospital, will provide significant improvements to medical and health services within the Region.

The Department is therefore satisfied that the impacts of the proposal can be suitably mitigated and/or managed to ensure a satisfactory level of environmental performance, pursuant to section 75J of the EP&A Act. Accordingly, the Department recommends the project application be approved, subject to conditions.



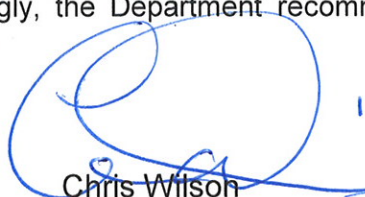
Heather Warton
Director
Metropolitan and Regional Projects North

17/3/11



Richard Pearson
Deputy Director General
Development Assessment & Systems Performance

20/3/11



Chris Wilson
Executive Director
Major Project Assessment

16.3.11

APPENDIX A ENVIRONMENTAL ASSESSMENT

See the Department's website at

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=1178

APPENDIX B SUBMISSIONS

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=1178

APPENDIX C PROPONENT'S RESPONSE TO SUBMISSIONS

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=1178

APPENDIX D CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS

State Environmental Planning Policy (Major Development) 2005

On 25 August 2009, the Deputy Director General, as delegate of the Minister, formed an opinion that the project is a major project under clause 18 of Schedule 1 to the MD SEPP, as it is for a hospital with a capital investment value of more than \$15 million. The Minister is the approval authority. The Capital Investment Value for the project is estimated at \$124.2 million.

State Environmental Planning Policy (Infrastructure) 2007

The aim of this policy is to assist in the effective delivery of public infrastructure throughout the State. The proposed development is subject to the provision of clause 101 of the SEPP in that Crown Street is identified as a classified road. In this respect, the RTA had previously advised the Proponent that access to the proposed development should occur via the local road network (Urunga Parade). Specifically, clause 101(2) of the SEPP states the following:

- (2) The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that:*
 - (a) where practicable, vehicular access to the land is provided by a road other than the classified road, and*
 - (b) the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of:*
 - i. the design of the vehicular access to the land, or*
 - ii. the emission of smoke or dust from the development, or*
 - iii. the nature, volume or frequency of vehicles using the classified road to gain access to the land, and*
 - (c) the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.*

Discussions were held between the Proponent and RTA in relation to the installation of a new signalised intersection at Crown Street and Staff Street to service the development and provide safe vehicular entry. Accordingly, the Proponent undertook the necessary modeling of the proposed intersection and surrounding road network to justify the proposed signalised intersection. Based on their review of the modeling, the proposed signalised intersection was approved by the RTA, subject to the imposition of recommended conditions.

Access to the proposed development will be provided from both Crown Street and Urunga Parade, while the provision of the signalised intersection at Crown Street and Staff Street will ensure that the safe and efficiency of the state classified road is maintained. Further, the proposed development has been suitably designed to ensure that Crown Street traffic does not impact on the future operations of the medical health facility. In this respect, it is considered that the project satisfies the provisions of clause 101 of SEPP (Infrastructure) 2007.

The proposal also triggers the provision of Clause 104, being listed as traffic generating development in Schedule 3 of the SEPP. In conjunction with the RTA's assessment of the proposed signalised intersection, no objections to the proposal were raised to the proposal, subject to the imposition of recommended conditions. Accordingly, appropriate conditions are recommended to reflect the RTA's comments and conditions.

State Environmental Planning Policy No. 55 – Remediation of Land

SEPP 55 requires a consent authority to consider whether the land is contaminated, and if so, whether the land will be remediated before the land is used for the intended purpose. Accordingly, the Proponent has provided an Environmental Site Assessment Report for the subject site that outlined the detailed investigations undertaken to ensure that the site is suitable for its intended purpose.

From the site investigations undertaken, it was noted that potential sources of contamination identified included potential fill material, residential garden herbicides and pesticides, petroleum hydrocarbons and PAH associated with a service pit and trade waste separator and asbestos and lead paint associated with the existing buildings on site.

From the initial sub surface investigations undertaken, the Report details that potential contamination sources were not detected at concentrations greater than the assessment criteria and that the likelihood of gross contamination was low. It was concluded that the subject site is suitable for the proposed hospital and that all excavated material would require classification in accordance with NSW DECCW Waste Classification Guidelines (DECC, 2009).

Wollongong Local Environmental Plan 2009

The subject site zoned SP1 Special Activities (Wollongong Hospital Precinct) zone. The proposed Wollongong Private Hospital is permissible within the zone with consent. The zone objectives include:

- (a) To provide for special land uses that are not provided for in other zones.*
- (b) To provide for sites with special natural characteristics that are not provided for in other zones.*
- (c) To facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land.*

The proposed development is considered to be consistent with the zone objectives, which includes facilitating development for the purpose of the special characteristics of the site and surrounding area, that being for hospital and medical research development.

Clause 4.3 of WLEP restricts development on the subject site to a maximum height of 32m, including all necessary plant and equipment. Accordingly, the proposal has been designed to comply with the maximum height control.

Clause 4.4A of WLEP stipulates a maximum FSR of 3:1 for the subject site. However, the proposed development proposes a maximum FSR of 3.69:1. Section 5.1.2 of the Director-General's Environmental Assessment Report has assessed that compliance with the development standard is unreasonable and unnecessary under the circumstances of the subject proposal. The proposed design of the proposal has been assessed as being an acceptable response to the site and surrounding built environment context and will provide significant social and economic benefits to the Wollongong and Illawarra Region.

APPENDIX E PLANNING ASSESSMENT COMMISSION REPORT

See the Planning Assessment Commission's website at:

<http://www.pac.nsw.gov.au/>

APPENDIX F POLITICAL DONATION DISCLOSURES

See the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=1178