

16 October 2020

Mr Jim Betts Secretary Department of Planning Industry and Environment Locked Bag 5022, Parramatta NSW 2124

Attn: David Gibson, Team Leader Social Assessments

Dear Mr Betts

Request for Secretary's Environmental Assessment Requirements – for proposed Paediatric Services Building (PSB) at The Children's Hospital at Westmead

Health Infrastructure NSW (HI) is the applicant for the proposed new Paediatric Services Building (PSB) at The Children's Hospital at Westmead (CHW) (the Project).

The proposal is State Significant Development **(SSD)** for the purposes of the *Environmental Planning and Assessment Act 1979* **(EP&A Act)**, and Schedule1, Clause 14(a) of the *State Environmental Planning Policy (State and Regional Development) 2011* **(SRD SEPP)** as it involves development for the purposes of a health services facility with a capital investment value in excess of \$30 million.

The purpose of this letter is to request the Secretary's Environmental Assessment Requirements **(SEARs)** in accordance with Section 5.15 of the EP&A Act and Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (**EP&A Regulation**) for the preparation of an Environmental Impact Statement (EIS).

This letter should be read in conjunction with the following attachments:

- Attachment A Indicative Site Plan and Section, prepared by Billard Leece Partnership Architects
- Attachment B Request for Aboriginal Cultural Heritage Assessment Report (ACHAR) Waiver and Aboriginal Heritage Due Diligence Assessment, prepared by Jacobs Group
- Attachment C Request for Biodiversity Development Assessment Report (BDAR) Waiver and supporting documents, prepared by Cumberland Ecology

1. Background

The Westmead Redevelopment project is transforming healthcare in Western Sydney. It is one of the biggest public health infrastructure projects in NSW and is delivering an innovative, integrated facility that will continue to deliver high quality healthcare for decades to come.

More than \$1 billion has already been invested in the first stages of the Westmead Redevelopment. The opening of the Central Acute Services Building (**CASB**) in early 2021 will see the completion of the CHW Stage 1 project, providing a brand new and expanded Children's Emergency Department, short-stay unit, additional operating theatres and shared medical imaging services.

As part of the next stage of the Westmead Redevelopment, in March 2019 the NSW Government committed to Stage 2 of the redevelopment of CHW. This investment will deliver further renewal and expansion of healthcare facilities, including new operating theatres and interventional suites, new neonatal and paediatric intensive care units and additional inpatient beds.

The CHW Stage 2 Master Plan, prepared by Billard Leece Partnership (**BLP**) Architects, provides a strategic development framework for CHW to enable the replacement and expansion of key services and facilities. The Master Plan sets out options for staged hospital redevelopment across the site for the CHW Stage 2 project and beyond.

1.1. CHW Stage 2 Project - the Vision

The vision for the CHW Stage 2 project is *Transforming Kids Health*, which is underpinned by the following key objectives:

- For the community and family togetherness provide a positive environment that supports the needs of the whole family and is welcoming and open to the community
- **Integrated research and education -** enable the integration of research and education, by fostering and growing strategic partnerships, to achieve clinical excellence in paediatric care in Westmead
- **Specialist role of CHW** enable the hospital to fulfil its tertiary and quaternary role of delivering health care which is responsive to outcomes that matter to children and their families
- World leading furthering CHW as a world leading facility to train and attract the best at Westmead
- **Sustainability and future focused -** providing infrastructure and services which are sustainable, agile and technology-enabled to support current and evolving models of care.

1.2. CHW Stage 2 Project

Stage 2 of the CHW redevelopment will include two major scopes of works, including:

- A new Paediatric Services Building (PSB) to be located adjacent to the CASB, and on the site of the decommissioned P17 car park, including development of the Hawkesbury Road forecourt and access links

 works subject to this Request for SEARs. This includes works associated with CHW forecourt on Hawkesbury Road to provide improved community amenity in the form of a new front entry, improved street frontage and enable a more cohesive main entrance connecting existing CHW, adjoining research facilities, and the PSB.
- A new Multi Storey Car Park (MSCP) accommodating both staff and visitor car parking to be located on Labyrinth Way and on the site of the existing former Ronald McDonald House works subject to separate Request for SEARs and SSD application.

Furthermore, there is the potential of an integrated building (**KIDSPARK Development**) to be located above the Hawkesbury Road forecourt (CHW forecourt), including potential integrated research uses with the Children's Medical Research Institute (CMRI). These works will be subject to future Request for SEARs and SSD application, subject to funding.

The development subject to this Request for SEARs is limited to the PSB scope of works detailed in Section 3 below, and in the attached indicative Site Plan and Section prepared by BLP.

The proposed PSB will enable the expansion and replacement of existing acute paediatric services at CHW. Along with the CASB, the PSB will be an important addition to the Westmead Health Precinct, enhancing the provision and quality of paediatric health services to the growing Western Sydney population.

1.3. Existing Hospital Services

CHW is identified as the largest paediatric centre in NSW and provides quality care and clinical services to children, managed by the Sydney Children's Hospital Network (SCHN). The services currently provided at the hospital include health and medical services, emergency services, laboratory services, education services and network services. CHW is closely linked with surrounding health, education and research facilities, including the University of Sydney, Kids Research (**KR**), CMRI, Westmead Institute for Medical Research (**WIMR**), and the Westmead Hospital as part of the CASB.

2. Site Description and Location

2.1. Location

CHW is located within the Westmead Health Precinct which spans over 75 hectares, comprising over 400,000m² of high-end health related developments, including four major hospitals, four medical research institutes and two university campuses. The Westmead Health Precinct stretches from Westmead Railway Station in the south to Toongabbie Creek and Parramatta River in the north and north-east.

The Westmead Health Precinct is located approximately 1.5km north-west of the Parramatta Central Business District (**CBD**) (the primary metropolitan centre of Western Sydney), and approximately 26km west of the Sydney CBD. The surrounding areas include Northmead, North Parramatta, Wentworthville and Constitution Hill.

Major health and education facilities, including CHW, Westmead Hospital and the Westmead Campus of Western Sydney University, are all accessible from Hawkesbury Road, which acts as the main north-south thoroughfare of the Precinct.

Stage 1 of Parramatta Light Rail, currently under construction with a projected completion date of 2023, will connect the Precinct with Parramatta and beyond to Carlingford. CHW will have access to its own light rail stop to be located along Hainsworth Street. Sydney Metro has also recently announced plans to complete a metro line in the late 2020s connecting Westmead Railway Station with Parramatta, Olympic Park and beyond to Sydney CBD.

Refer to the context maps at **Figure 1** and **Figure 2**.





The indicative location of the proposed PSB is shown with a red dot.

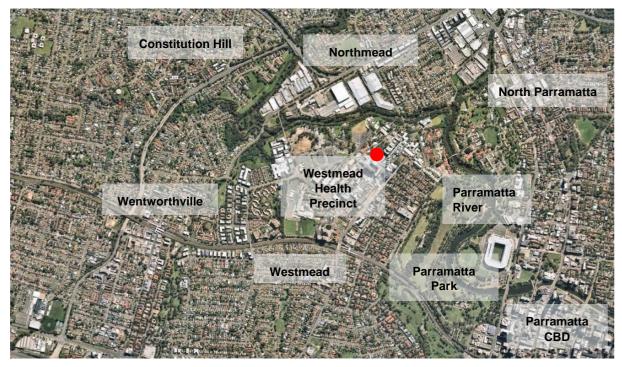


Figure 2 Regional context of Westmead Health Precinct, Source: Nearmap with Architectus edits (2020)

The indicative location of the proposed PSB is shown with a red dot.

2.2. Site

The site of the proposed works forms part of the Westmead Health Precinct and is located at the site of the decommissioned P17 car park, as well as the existing CHW forecourt and a small link area through the existing KR building. Refer to **Figure 3** below.



Figure 3 The indicative location of the proposed scope of works is shaded in red, Source: NearMap with Architectus edits (2020)

2.3. Existing Development

The location for the future PSB is shown at **Figure 4**. The site is located on the eastern side of Redbank Avenue. The demolition of the P17 car park was assessed via a Review of Environmental Factors (REF) and approved in May 2020, under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as part of broader Campus wide improvements. Demolition will be completed in January 2021.

The site is located adjacent and to the north of the CASB, of which construction is completed and operations due to commence early 2021. Other adjoining buildings to the site include the KR building, CMRI and Blocks 5, 6 and 8 of CHW. Redbank Road is located along the north-western boundary of the site and served as the P17 car park's only vehicular access point.

The existing CHW forecourt is a green space that accommodates the main pedestrian entrance to the existing CHW, as well as an ambulance access point. The ambulance access point will be decommissioned following the opening of the CASB in early 2021, which includes new ambulance bays to support the new Children's Hospital Emergency Department.

2.4. Legal Description

The PSB scope of works falls on a lot legally described as Lot 101 in Deposited Plan 1119583 as illustrated in **Figure 4** below. The lot is under the ownership of the NSW Health Administration Corporation.

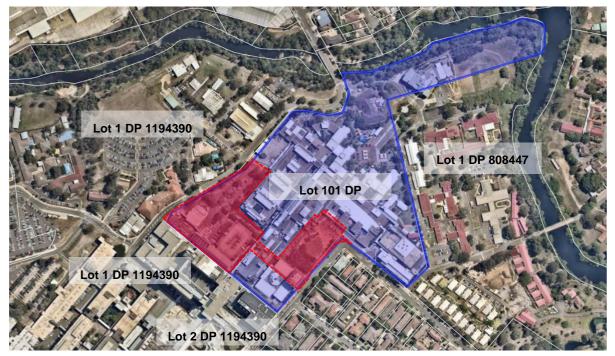


Figure 4 Aerial photo of subject Westmead Health Precinct, Source: NearMap with Architectus edits (2020)

Subject lot shown in blue above. The indicative location of the proposed PSB is illustrated in red.

2.5. Built Form Context

The Westmead Health Precinct is largely developed with numerous buildings of heights and scales, including the complex of buildings that comprise Westmead Hospital and CHW. Numerous at-grade parking lots are scattered around the site, particularly along Redbank Road and Dragonfly Drive. With the recent completion of the new CASB, this will bring the precinct to its tallest height, at 13 storeys / RL 86.495.

The built form in the immediate vicinity of the proposed PSB includes:

- 7 storey CMRI building completed 2014
- 4 storey KR building– completed 1995
- 3 storey Block 5 CHW (Diagnostics) completed 1995

- 4 storey Block 6 CHW (Main Building) completed 1995
- 3 storey Block 8 CHW (Outpatients) completed 1995
- 1 storey childcare centre completed 1995
- 13 storey CASB completed 2020

2.6. Parramatta North Precinct

The Parramatta North Precinct is being planned for revitalisation by restoring and protecting existing heritage buildings and infrastructure. The Parramatta North Precinct comprises approximately 26 hectares of land located along the eastern foreshore of the Parramatta River, opposite to the CHW, Westmead Hospital, Parramatta Park, and north of the Parramatta CBD.

The Parramatta North Precinct is envisioned to become a vibrant place to live with new homes, shops, restaurants, cafes and parks. The Precinct was rezoned on 20 November 2015, resulting in amendments to the Parramatta Local Environmental Plan (LEP) 2011 that allow for 20,000m2 of new commercial floor space, a village centre of around 4,000m2 of floor space, and 3,000 homes close to Parramatta CBD, transport, parklands and local services.

The built form of Parramatta North is proposed to include a range of building heights, from 1-3 storeys (near to existing heritage buildings) up to 30 storeys at the eastern edge of the Precinct. The heritage items located within Parramatta North are discussed in further detail in Section 5 below.

2.7. Recently approved major works on site

The CASB was approved under an SSD application at the Westmead Health Precinct on 21 December 2016. Construction of the CASB is complete with operational readiness activities ongoing, with an anticipated commencement of services in early 2021. This will see the completion of the CHW Stage 1 project providing a brand new and expanded Children's Emergency Department, short-stay unit, additional operating theatres and shared medical imaging services. The CASB project included the construction of:

- A building up to a height of 13 storeys;
- A helipad on the uppermost roof of the building;
- Forecourt areas with two levels of underground car parking, drop-off/pick-up areas and landscaping;
- Overhead pedestrian links to other hospital buildings; and
- A loading dock accessible from Redbank Road.

The Darcy Road multi storey car park was approved under an SSD application at Westmead Hospital Precinct on 25 May 2016 and completed in December 2017. The Darcy Road multi storey car park included:

- Construction of an eight-storey car park;
- Demolition works, including tree removal;
- Construction of additional at grade carparking;
- Extension and widening of Institute Road; and
- Landscaping works.



Figure 5 Photograph of P17 multi storey car park, looking south east towards the KR building. Source: BLP



Figure 7 Existing forecourt fronting the Children's Hospital at Westmead, looking west towards CASB Source: BLP



Figure 6 Photograph of vacant site adjacent to P17 multi storey car park, looking south east. Source: BLP



Figure 8 Existing forecourt fronting the Children's Hospital at Westmead, looking north west to the KR building. Source: BLP

3. The Project

This Request for SEARs seeks environmental assessment requirements for an SSD application for construction of a new Paediatric Services Building (PSB), including ancillary works to the CHW forecourt and KR building. The proposed PSB will enable the expansion and replacement of existing paediatric services at CHW, providing additional surgery, inpatient and critical care services.

The PSB will be an important addition to the Westmead Health Precinct, enhancing the provision and quality of paediatric health services to the growing Western Sydney population and beyond. The PSB development will provide improved community amenity in the form of a new front entry, improved street frontage and enable a more cohesive main entrance connecting existing CHW, adjoining research facilities, and the PSB.

The scope of proposed works includes:

- Construction of the main PSB:
 - The main PSB may contain the following uses: perioperative and interventional services, neonatal and paediatric intensive care units, cancer centre, acute inpatient beds, back of house and parent facilities; and
 - The building is proposed to potentially reach 13 storeys, in alignment with the CASB which is also built to 13 storeys
- Alterations and additions to existing CHW KR and CASB buildings adjoining PSB site area to accommodate floor realignment and movement corridors
- Construction of a new pedestrian canopy link through KR, connecting the main PSB with the CHW forecourt and existing hospital entrance
- The canopy link is to be lifted 2 storeys above the CHW forecourt

- A new ground plane / forecourt landscaped area extending from Hawkesbury Road to the proposed PSB
- Tree removal to accommodate the construction of the PSB

It is noted that the PSB scope of works only includes ground plane works up to a 2-storey canopy to the CHW forecourt, and that the aforementioned potential KIDSPARK Development, to be located above the CHW forecourt, is a separate scope of works subject to a future SSD application.

Refer to Figures 9 and 10 below for indicative site plan and section of the proposed works.



Figure 9. Indicative site plan – Paediatric Services Building Scope, Source: BLP (2020)

The indicative location of the proposed PSB is shown in orange, with the extent of the works zone shown in red dash. The plan also shows the PSB in context with the MSCP which is subject to a separate planning approval.

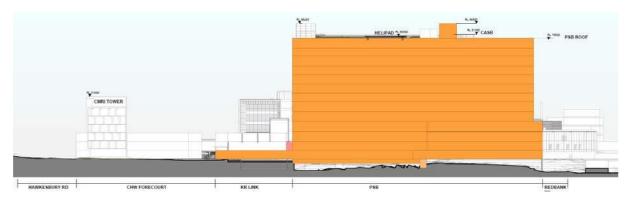


Figure 10. Indicative site section – Paediatric Services Building Scope, Source: BLP (2020)

This plan illustrates a typical north-south section through the proposed PSB.

3.1. Capital Investment Value

The estimated construction cost for the proposed development is over \$30,000,000. This figure will be confirmed in a detailed Quantity Surveyor's Cost Report that will accompany the Environmental Impact Statement (**EIS**).

4. Planning Framework

4.1. Strategic Planning Context

4.1.1.NSW Premier's Priorities

The Premier's Priorities are 14 directions reflecting the NSW Government's whole-of-government approach to addressing important issues for NSW. The Project is consistent these priorities:

- Improving the Health System Improving Service Levels;
- Improving the Health System Improving Outpatient and Community Care;
- Building infrastructure;
- Jobs closer to home; and
- Increased business investment.

The proposal for the redevelopment of the CHW Hospital will provide state of the art facilities and equipment and will reduce waiting times by improving capacity.

4.1.2. State Infrastructure Strategy 2018-2038: Building Momentum

The State Infrastructure Strategy 2018-2038, released in February 2018 by Infrastructure NSW, is a 20-year strategy that outlines the NSW Government's major long-term infrastructure plans across all key sectors – transport, energy, water, health, education, justice, social housing, culture, sport and tourism.

The Strategy notes that the NSW population is set to increase from 7.7 million in 2016 to over 12 million by 2056, with around 80 per cent of this growth expected to be in Greater Sydney in the next 20 years. Additionally, there will be an increase in the number of people aged 70 years and over. The State's projected population growth and demographic changes highlight that there is a need to expand and deliver more health infrastructure and services to support the State's medical needs. Additionally, the strategic objective for health under the Strategy is to "Plan and deliver world-class health infrastructure that supports a 21st century health system and improved health outcomes for the people of NSW".

The proposal aligns with the strategic objectives of the Strategy as the proposed scope of works will contribute to the redevelopment and expansion of the Westmead Health Precinct. The proposal is part of a redevelopment project that will enable the Westmead Health Precinct to become an innovative, contemporary and integrated centre which will continue to deliver high quality health care and increase the Precinct's workforce from 18,000 to 32,000 by 2036.

4.1.3. Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan: A Metropolis of Three Cities, released in March 2018, provides a 40-year vision (to 2056) and establishes a 20 year plan of Greater Sydney to become a city where people will live within 30 minutes of jobs, education and health facilities, services and great places.

The delivery of the project would be consistent with the vision of the Greater Sydney Region Plan as the proposed scope of works will facilitate the Stage 2 redevelopment of CHW and reinforce the Westmead Health Precinct as a significant employment, education and health services hub. The proposal will contribute to rebalancing opportunities across the Greater Sydney Region, and support the delivery of a 30-minute city, where families are able to access world-class medical support within a reasonable timeframe.

The Plan identifies that the role of Westmead Health Precinct is to be an economic catalyst for Greater Parramatta and the Greater Parramatta and the Olympic Peninsula **(GPOP)** Economic Corridor. It states that improved and enhanced access to the Precinct will help boost the success of Parramatta in becoming stronger and better connected. The Plan also notes that by 2036, 21 per cent of all jobs in Greater Sydney are projected

to be in the health and education sectors, up from 19 per cent in 2016. As the proposal is part of the Stage 2 redevelopment of the CHW, the proposed scope of works will facilitate the growth of health facilities in the Precinct and provide more jobs in the health sector, ultimately contributing to the economic productivity of the area.

4.1.4. Central City District Plan

The Central City District Plan was released in March 2018 to support the role of the Greater Sydney Commission and the implementation of the 'Greater Sydney Region Plan'. The Plan proposes a 20-year vision for the District and provides directions for the District's infrastructure and collaboration, liveability, productivity, and sustainability.

The following planning priorities are of relevance to the proposed scope of works:

• Planning Priority C1 – Planning for a city supported by infrastructure

The proposal will facilitate the success of the CHW to provide health services to children who are sick and require medical help. Ultimately, this will ensure that the District's children are supported by, and have access to, essential infrastructure, such as health facilities and services.

- Planning Priority C7 Growing a stronger and more competitive Greater Parramatta
- Planning Priority C8 Delivering a more connected and competitive GPOP Economic Corridor

The Plan identifies the Westmead Health Precinct as one of the key components to growing a stronger and more competitive Greater Parramatta. Westmead is identified as having the potential to become an Innovation District, and capable of providing 50,000 jobs.

The proposal is consistent with Planning Priority C7 and Planning Priority C8 as it facilitates the redevelopment of Westmead in becoming a world-class health precinct, which in turn will increase job opportunities and support improved job containment within the District. This will support economic growth in Greater Parramatta and the GPOP Economic Corridor.

4.1.5. Westmead Health Core Master Plan

The Westmead Health Core Master Plan prepared by Billard Leece Architects in 2020 established design principles and a structure plan to guide future developments within Westmead Health Core (Health Administration Corporation owned lands at Westmead). Key urban outcomes of the Health Core Master Plan respond to the urban characteristics of the site, including:

These key outcomes of the Westmead Health Core Master Plan are applicable to the CHW MSCP in addressing:

- Providing greater connectivity within the site to green space and other developments.
- Parking at the perimeter of the Westmead Health Core to minimise through traffic.
- Vehicle and pedestrian separation.

The Westmead Health Core Master Plan has informed the *Draft Westmead Strategic Plan (Place Strategy)* which is understood to be due for public exhibition by the Department of Planning, Industry and Environment imminently.

4.2. Statutory Planning Context

The following legislation and Environmental Planning Instruments will be relevant considerations to the SSDA. Those under the following subheadings are of key relevance to the proposal.

- Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act);
- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- Biodiversity Conservation Act 2016;

- Contaminated Land Management Act 1997
- National Parks and Wildlife Act 1974;
- State Environmental Planning Policy (State and Regional Development) 2011;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No 55—Remediation of Land;
- State Environmental Planning Policy No 33 Hazardous and Offensive Development;
- State Environmental Planning Policy No 64—Advertising and Signage; and
- Parramatta Local Environmental Plan 2011.

4.2.1. Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The Commonwealth EPBC Act legislates the provisions for the assessment of actions likely to have a significant impact on Matters of National Environmental Significance (MNES) listed under the Act. It provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places — defined in the EPBC Act as MNES. Based on the proposed scope of works for the PSB, it is not expected that any significant impacts to MNES will amount.

Refer to Ecology and Heritage discussions at Section 5 below.

4.2.2. Environmental Planning and Assessment Act 1979

Part 4, Division 4.1 of the Environmental Planning and Assessment Act 1979 (EP&A Act) establishes the assessment framework for SSD. Under Section 4.38, the Minister is the consent authority for SSD. Section 4.12(8) requires an EIS to accompany an SSD application in the form prescribed by the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

4.2.3. Biodiversity Conservation Act 2016

The Biodiversity Conservation Act 2016 (BC Act) identifies threatened species, populations and ecological communities in NSW and provides mechanisms for their conservation and recovery.

Section 7.9 of the Biodiversity Conservation Act 2016 requires that an Environmental Impact Statement submitted with an SSD application be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

A preliminary investigation (Attachment C) has been completed by Cumberland Ecology to determine whether the project is likely to have any significant impact on biodiversity values and whether a BDAR is required for the proposed PSB.

Based on Cumberland Ecology's investigation, it is considered that the proposed development is not likely to have any significant impact on biodiversity values and that a BDAR is not necessary:

When assessing impacts to potentially occurring threatened species from the project, there is limited justification for considering impacts to threatened species with the detail required under the BAM. The project may result in a small reduction of marginal foraging habitat for highly mobile, aerial threatened species. It is considered unlikely that a significant impact to threatened species would occur as a result of the proposed development.

On the basis of our investigations, we believe that the preparation of a BDAR is not necessary due to the low likelihood of impacts to biodiversity values.

Refer to Request for BDAR Waiver, prepared by Cumberland Ecology, appended at Attachment C.

4.2.4. Contaminated Land Management Act 1997

A detailed site investigation completed by JBS&G for Lot 101 in Deposited Plan 1119583 has found that the lot is not subject to any declarations, orders, or voluntary management proposals as defined in Section 59(2) of the

Contaminated Land Management Act 1997. The contamination matters discussed in Section 5 below outlines that the site contains ACM contaminated fill, which will be managed with a Remedial Action Plan (RAP), Long Term Asbestos Management Plan (LTAMP) and appropriate Construction Environmental Management PLAN (CEMP).

4.2.5. Heritage Act 1977

Refer to Heritage matters at Section 5 below. For EPBC Act related heritage matters, refer to EPBC Act above. The site does not contain any world, national, state or local heritage items, and is not located within a heritage conservation area. A number of State heritage items are located in the vicinity of the site, the closest being Wisteria Gardens within the Cumberland District Hospital site (located approximately 550m south east). It is not anticipated the proposed PSB will have any significant negative impacts on any heritage items in the vicinity.

4.2.6. State Environmental Planning Policies

The following table identifies the key State Environmental Planning Policies (SEPPs) that apply to this proposal:

Table 1. Applicable SEPPs

SEPP No	Name	Applies	Capable of Complying*
33	Hazardous and Offensive Development	Yes	Yes
55	Remediation of Land	Yes*	Yes
	Infrastructure 2007	Yes	Yes
	State and Regional Development 2011	Yes	Yes
	Vegetation in Non-Rural Areas	Yes	Yes
	Sydney Regional Environmental Plan [now deemed SEPP] (Sydney Harbour Catchment) 2005	Yes	Yes
Draft	(Draft) Environment SEPP	Yes	Yes
Draft	(Draft) Remediation of Land	Yes	Yes

*Subject to future detailed design processes

4.2.7. State and Regional Development SEPP 2011

The total estimated Capital Investment Value (CIV) of the project is estimated to exceed the minimum threshold of \$30 million CIV for hospitals to be assessed as State Significant Development (SSD), as specified under Schedule 1, Clause 14(a) of the SRD SEPP 2011.

4.2.8. Land Use Permissibility

The site is subject to Zone SP2 – Infrastructure (Health Services Facility) under the Parramatta LEP 2011. Refer to an extract of the Parramatta LEP 2011 provided at Figure 16.

Clause 57(1) of State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) establishes that development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone. The proposed PSB scope of works is permitted with consent as a hospital facility under the prescribed zone SP2 – Infrastructure (Health Services Facility).

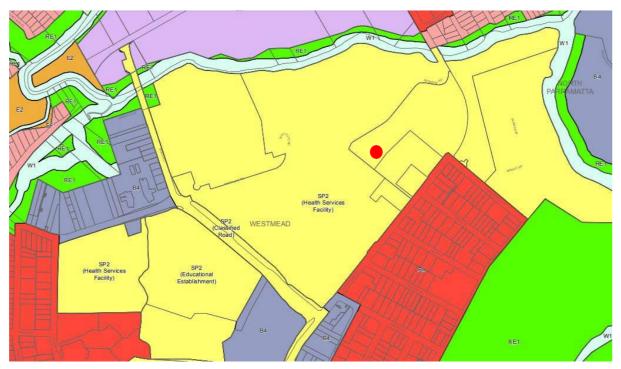


Figure 16 Extract of zoning map of Parramatta Local Environmental Plan 2011, Source: PLEP 2011, 6250_COM_LZN_004_010_20150122, with Architectus edits (2020). The indicative location of the proposed works is illustrated by the red dot above.

4.2.9. Parramatta LEP 2011 Development Standards & Other Provisions

The site is not subject to a maximum height of buildings control pursuant to Clause 4.3 or any Floor Space Ratio (FSR) restriction pursuant to Clause 4.4 of the Parramatta LEP 2011.

Notwithstanding, a number of provisions of the LEP 2011 do apply to the site which provide matters for consideration and must be incorporated in the assessment of any development, including, however not limited to, Clause 5.10 (Heritage Conservation), Clause 6.1 (Acid Sulphate Soils), Clause 6.2 (Earthworks) and Clause 6.3 (Flood planning).

5. Key Environmental and Planning Issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future SSDA.

5.1. Aboriginal Heritage

An Aboriginal Heritage Due Diligence Assessment **(Attachment B)** has been completed by Jacobs Group, which has confirmed that it is unlikely that Aboriginal archaeological material would be present on site, considering that the site is highly disturbed and has already been developed for the construction of supporting infrastructure for CHW. No Aboriginal objects and / or cultural material were identified during preliminary site investigations. No Aboriginal objects and / or cultural material were identified during preliminary site investigations:

A search of the AHIMS site register, and review of the environmental, cultural and archaeological context, along with a site inspection has demonstrated that the study area has low-nil potential for Aboriginal objects and places. The study area is heavily disturbed from historical land use of the region for farming and agricultural purposes, and from recent development associated with the hospital. The area does not have a likelihood of containing Aboriginal objects that would be sufficient to trigger any further archaeological assessments.

The assessment has been prepared to ensure HI exercises due diligence when carrying out the proposed infrastructure and that Aboriginal objects, if present, are not harmed. This report has been prepared in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW 2010b) and determines that the area is unlikely to contain Aboriginal objects that would require further archaeological assessments.

In addition to the findings of the Aboriginal Heritage Due Diligence Assessment, an ACHAR had previously been prepared by RPS (Attachment B) in 2015 for the Westmead Hospital precinct as part of the CHW Stage 1 project, which included the area subject to the proposed PSB development. Refer to Figure 9.



Figure 9 Archaeological and cultural sensitivity map, Source: Jacobs. The indicative location of the proposed PSB is illustrated by a blue circle.

As part of the ACHAR, field surveys were taken of the site to facilitate consultation with Registered Aboriginal Parties (RAPs). No Aboriginal objects and / or cultural material were identified during the field survey. The ACHAR concluded that the Stage 1 redevelopment would not have nil impact on Aboriginal cultural heritage within the study area.

Based on the conclusions drawn from the Aboriginal Heritage Due Diligence Assessment and previous ACHAR, a letter supporting a waiver for an Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Jacobs Group (Attachment B):

The proposed PSB is wholly within that area of low-nil archaeological and cultural sensitivity assessed in 2015. The site of the proposed PSB is in a highly urbanised context that has been disturbed by the construction of multiple hospital buildings and associated infrastructure. As noted in the 2015 ACHAR, this has involved cutting and benching, excavation and redeposition of imported fill. No natural land surfaces were observed during a site visit on 18 June 2020.

As such, HI request for an Aboriginal Cultural Heritage Assessment Report (ACHAR) Waiver for the proposed PSB.

5.2. European Heritage

There are no World Heritage Sites located within the study area. There is a UNESCO World Heritage Item located within the vicinity of the site identified as Old Government House and Government Domain. However, it is not anticipated that there will be any direct impact on these items given that it is located a considerable distance away (approximately 1.3 kilometres).

A search of the Australian Heritage Database has indicated that there are no items within the site included on the National Heritage List or Commonwealth Heritage List. There is a National Heritage listing located within the vicinity of the site identified as the Parramatta Female Factory and Institutions Precinct, located within Cumberland Hospital East, albeit located approximately 850m east of the site. Due to the considerable distance of these items from the site, the proposed PSB is not anticipated to have any direct impact on these items' heritage significance. Notwithstanding, impact on these items in relation to the Environment Protection and Biodiversity Conservation Act (EPBC Act) will be considered.

Lot 101 in Deposited Plan 1119583 (the subject lot) is not identified as a heritage item, nor is it within a heritage conservation area under the Parramatta LEP 2011. The adjacent lot to the east (Lot 1 in Deposited Plan 808447) contains State heritage item no. 100820 'Cumberland District Hospital (including Wisteria Gardens)':

The Wisteria House gardens are of historical and aesthetic significance, providing a contemporary landscaped setting for Wisteria House and for their association with Dr Williamson the hospital's superintendent.

Office of Environment and Heritage - Statement of Significance

It is noted that the Wisteria House Gardens are located approximately 550m south east of the proposed PSB and is not anticipated to be directly impacted by the proposed works. View impacts from Wisteria House Gardens will be considered as part of the SSD application.

Refer to **Table 1** below for heritage items within the vicinity of the site.

Item name	Item number	Significance	Approximate distance from site	
Parramatta Female Factory and Institutions Precinct	106234	National	850m (east)	
Cumberland District Hospital	100820	State	Adjacent east	
(including Wisteria Gardens)	(100820)	(State)	(550m south east)	
Parramatta Park and Old Government House	100596	State	1.3km (south east)	
Heritage brick drain	1360	Local	600 m (east)	
Western Sydney University	1628	Local	500 m (south west)	
Victorian Residence (in grounds of WSU)	1629	Local	500 m (south west)	
Former tramway pier	1445	Local	200m (north east)	

Table 1: Heritage items surrounding the subject site

Refer to the Parramatta LEP 2011 Heritage Map, provided in **Figure 10** below.



Figure 10 Extract of heritage map of Parramatta Local Environmental Plan 2011, Source: Parramatta LEP 2011, 6250_COM_HER_004_010_20130621, with Architectus edits (2020). The indicative location of the proposed works is illustrated by the red dot above.

The SSD application will assess the impacts of the proposed development on these and any other known heritage items, although it is not anticipated there will be any direct impact on heritage items located in the vicinity of the proposed development.

5.2.1. View Corridors / Visual Impact

It is noted that with the number of heritage items located in the vicinity of the proposed development, assessment of visual impact and view corridors of significant heritage items will be undertaken as part of the SSD application. This may include the impact assessment of important views from Old Government House and items within North Parramatta (Cumberland Hospital, including the Parramatta Female Factory and Institutions Precinct).

5.3. Transport and Access

The site's location and surrounding transport network comprises of:

- North-west transit way (T way) with Darcy Road stops located approximately 500m to the south;
- Westmead railway station is located approximately 950m to the south;
- Visitor access to CHW is generally via Hawkesbury Road and Hainsworth Street to the south east;
- Staff access is generally via Institute Road and Dragonfly Drive to the north west and Redbank Road to the north east; and
- Active transport facilities along the south west periphery, providing linkage to Parramatta CBD and via a mixture of on road and off-road paths.

It is noted that Parramatta Light Rail Stage 1 is currently under construction on Hawkesbury Road and Hainsworth Street, along the south east boundary of the campus (and site). Sydney Metro has also recently announced plans to complete a metro line in the late 2020s connecting Westmead Railway Station with Parramatta, Olympic Park and beyond to Sydney CBD.

A traffic and parking study will accompany the SSD application. It will assess the access requirements for the proposed PSB, the feasibility and impacts of the proposed circulation and parking changes on the surrounding road network, as well as nearby intersections.



Figure 11 Existing traffic access plan, Source: Westmead Redevelopment, http://www.westmeadproject.health.nsw.gov.au/ with WSP edits (2020) The indicative location of the proposed works is illustrated by the red dot above.



Figure 12 Interim car parking plan, Source: WSP (2020) The indicative location of the interim car park is indicated in yellow above.

5.4. Topography

The natural topography of the site slopes gently downwards to the north and north west towards Toongabbie Creek. The general topography of the area has some flooding implications as discussed below. A detailed survey will be provided as part of the SSD application to confirm existing RLs across the site.

5.5. Flooding

The north of the precinct, towards Toongabbie Creek, is affected by a 100-year Average Recurrence Interval flood.

The City of Parramatta Council has identified that part of the site near the proposed KIDSPARK as having low risk flood impacts through their FloodSmart interactive map. Council defines 'Low Risk' land as, *"flooding is extremely rare but when this happens flooding will cover a large area with dangerous water in many places"*, and is the area between 1% AEP and the Probable Maximum Flood (PMF).

As illustrated in **Figure 13** below, the proposed PSB works will be located above the 1:100 AEP (Annual Exceedance Probability) flood, though is noted that part of the proposed PSB works may be located within the Probable Maximum Flood (PMF) extent. A flood report will be prepared for the SSD application to assess flood risk and determine acceptable mitigation measures.

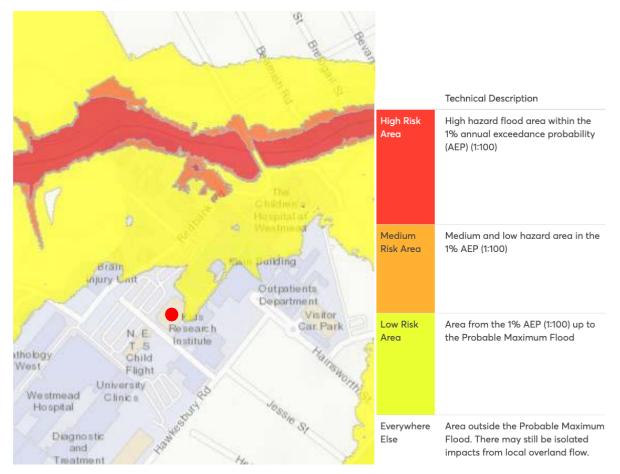


Figure 13 Site identified as low flood risk, Source: City of Parramatta's FloodSmart interactive map with Architectus edits (2020).

The indicative location of the proposed works is illustrated by the red dot above.

5.6. Contamination

JBS&G have been commissioned to prepare a Detailed Site Investigation for the site. The review of historical site use information and inspection of site conditions identified potential Areas of Environmental Concern (AEC) and associated Contaminants of Potential Concern (COPC), which were associated with potential importation of fill materials from unknown origins and former use of the site for agricultural purposes. Additionally, the site has historically been subject to asbestos containing material (ACM) dumping by the former operations of James Hardie Industries.

There were several types of fill materials encountered across the site, with the dominant fill consisting of brown to dark brown heterogenous sandy clay/silty sandy clay to depths ranging from 1.5 m bgs to 6.2 m bgs, with anthropogenic inclusions of asbestos, plastic, metal fragments, bricks, concrete fragments, igneous gravels, trace bitumen and glass.

Bonded asbestos containing material (ACM) and fibrous asbestos were found, and it is anticipated that the asbestos in soils will impact on all fill materials at the site. In response, a Remedial Action Plan (RAP) and Long Term Asbestos Management Plan (LTAMP) will be prepared and implemented.

Additionally, a Construction Environmental Management Plan (CEMP) will be provided prior to redevelopment works, documenting the environmental monitoring and management measures required to be implemented during construction works related to the site. The existing CHW Asbestos Register and Asbestos Management Plan (AMP) and Western Sydney Local Health District Asbestos Management Plan (WSLHD AMP) will be updated to reflect the findings of this assessment, and a redevelopment specific Asbestos Register and AMP will be prepared and implemented during redevelopment works.

In line with best practice and the approach taken for Westmead Hospital Stage 1 Redevelopment, Health Infrastructure NSW intend to appoint a Site Auditor for the whole of the CHW Stage 2 redevelopment.

5.7. Vegetation & Ecology

The subject site is largely developed and is generally devoid of significant vegetation, with areas of landscaping throughout. An Ecological Assessment was previously prepared by RPS Group in 2015 to inform the works of the Stage 1 redevelopment of Westmead Hospital. The Ecological Assessment included a survey of existing vegetation across the Westmead Health Precinct, which includes the subject site. The vegetation survey notes that the site does not contain any threatened species or threatened ecological communities, with the existing vegetation on the site classified as 'urban exotics and natives'. Notwithstanding, this study was prior to the *Biodiversity Conservation Act 2016* so a new assessment is required.

Section 7.9 of the *Biodiversity Conservation Act 2016* requires that a Biodiversity Development Assessment Report (BDAR) accompany an SSD application unless both the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. A preliminary investigation **(Attachment C)** has been completed by Cumberland Ecology to determine whether the project is likely to have any significant impact on biodiversity values and whether a BDAR is required for the proposed PSB. Based on Cumberland Ecology's investigation, it is considered that the proposed development is not likely to have any significant impact on biodiversity values and that a BDAR is not necessary:

When assessing impacts to potentially occurring threatened species from the project, there is limited justification for considering impacts to threatened species with the detail required under the BAM. The project may result in a small reduction of marginal foraging habitat for highly mobile, aerial threatened species. It is considered unlikely that a significant impact to threatened species would occur as a result of the proposed development.

On the basis of our investigations, we believe that the preparation of a BDAR is not necessary due to the low likelihood of impacts to biodiversity values.

Refer to Request for BDAR Waiver, prepared by Cumberland Ecology, appended at Attachment C.

5.8. Bushfire

According to a search using the bush fire prone land mapping tool found on the NSW Rural Fire Service website, the site is not identified as bushfire prone land or being within a bushfire buffer area.

The closest bush fire prone land to the site is located in North Parramatta, however, this is a considerable distance away (1.6km north east).

5.9. Noise and Vibration

An analysis of the construction and operation noise will require consideration of impacts upon the nearby health facilities, research institutes and residential uses. An acoustic and vibration assessment will be submitted with the PSB SSD application.

5.10. Aviation

The PSB structure will be designed to allow a Helicopter Landing Site (HLS) to be added onto the roof of the PSB in the future, at a maximum height of RL 79.60.

Helicopter operations currently occur across 4 Helicopter Land Sites (HLS) on the Westmead Precinct:

- CareFlight HLS located on the oval adjacent to P14 car park
- The existing Westmead Hospital Emergency Department HLS
- The CHW Hainsworth Street car park HLS
- The new CASB Helipad (at a height of RL 80.50)

Aviation advice will be sought to support the SSD application to ensure there will be no interference to flight paths within the HLS precinct attributed to the potential height and proximity of the proposed PSB helipad to the CASB helipad and other HLS in the area.

5.11. Built Form and Visual Impact

Whilst the site is not subject to maximum building height or floor space ratio (FSR) controls, the surrounding built form context has been considered in determining the maximum building height of RL 79.60 for the PSB. For reference, the adjacent CASB has a maximum height of RL 81.300 with a total of 13 storeys (RL 86.495 to rooftop plant). Additionally, the planned revitalisation of Parramatta North Precinct, located approximately 760m north east of the proposed PSB, envisions a range of building heights from 1-3 storeys (near to the existing heritage buildings) and up to 30 storeys at the eastern edge of the Precinct.

The proposed scheme will be the subject of a merit assessment with regard given to the height and massing of the proposed development in the context of the surrounding landscape.

5.12. Infrastructure and servicing

The site is adequately serviced with potable water, sewer, stormwater, electricity and telecommunications services. Consultation will be undertaken with all relevant service providers in relation to any required capacity augmentation of existing services to the site.

5.13. Civil and Structural Works

Civil and structural documentation will be submitted with the SSDA including a flooding statement, stormwater management plans and sediment and erosion control plans.

5.14. Construction Impacts

Impacts of construction will be assessed in the EIS. The SSDA will include the following:

- Construction Management Plan
- Construction Traffic Management Plan
- Construction Waste Management Plan
- Noise and Vibration Impact Assessment.

5.15. Waste Management

A detailed Waste Management Plan will be prepared and submitted with the EIS. It will outline the anticipated quantities and streams of waste generated by the proposal during construction and operation, and the intended management of waste in terms of storage, removal off-site and disposal.

5.16. Socio-economic Impact

The social and economic impacts resulting from the proposal will be detailed in the EIS. Anticipated social and economic benefits include:

- significantly improved health facilities for the community;
- creation of construction and operational jobs;
- direct and indirect benefits to the local economy; and
- enhancement of the visual amenity of the hospital through development of well-designed, high quality buildings and associated facilities, along with significant landscaping.

5.17. Air quality

The air quality impact caused by the construction and operation of the proposal to surrounding sensitive receivers will be subject to assessment under the EIS. Mitigation and management measures to reduce the proposal's impact to adverse air quality will also be identified where relevant.

6. Consultation Undertaken

Consultation has been undertaken to date by Health Infrastructure, the Project Manager and the consultant team for the proposed Stage 2 Redevelopment of CHW. This consultation has included, and will continue to include (although not limited to):

- Government Architect NSW
- Transport for NSW (including the former RMS)
- Parramatta City Council
- Western Sydney Local Health District (WSLHD)
- NSW Ministry of Health Staff
- The local community
- Westmead Institute for Medical Research (WIMR)
- Children's Medical Research Institute (CMRI)
- The University of Sydney

Further consultation will continue with key stakeholders and agencies during the preparation and assessment of the EIS. Additional stakeholders include:

- The local community
- NSW Environment, Energy and Science Group
- Heritage NSW
- Office of Water
- Environment Protection Authority.

The EIS will be placed on public exhibition once the Department has reviewed the EIS to confirm that it has satisfactorily responded to each of the issues identified in the SEARs. The key stakeholders will be provided with an additional opportunity to review the proposal, including the final development plans and the detailed specialist studies and assessment reports accompanying the final EIS.

7. Request for SEARs

On the basis that the proposal meets the criteria identified in Schedule 1 Clause 14(a) of the State and Regional Development SEPP, Health Infrastructure formally requests that the Planning Secretary issue the SEARs to facilitate the preparation of the EIS for the proposed CHW PSB scope of works, as detailed in this document.

Should you have any queries, please do not hesitate to contact Claire Muir, Senior Town Planning Advisor on 0422 379 612.

We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely,

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Rebecca Wark

Chief Executive, Health Infrastructure

- Attachment A Indicative Site Plan and Section, prepared by Billard Leece Partnership Architects
- Attachment B Request for Aboriginal Cultural Heritage Assessment Report (ACHAR) Waiver and Aboriginal Heritage Due Diligence Assessment, prepared by Jacobs Group
- Attachment C Request for Biodiversity Development Assessment Report (BDAR) Waiver and supporting documents, prepared by Cumberland Ecology