

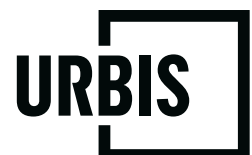


ENVIRONMENTAL IMPACT STATEMENT

Alexandria Health Centre

SSD-38600121

Prepared for
ALEXANDRIA PROPERTY DEVELOPMENT PTY LTD
July 2022



URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P0037375
Report Number	Final - 07072022

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ENVIRONMENTAL IMPACT STATEMENT - 28-32 BOURKE ROAD,
ALEXANDRIA_20220706

CONTENTS

Signed Declaration	5
Glossary and Abbreviations	7
Executive Summary.....	9
1. Introduction	14
1.1. Applicant Details	14
1.2. Project Objectives	14
1.3. Project Description	14
1.4. Project Background.....	17
2. Strategic Context.....	19
2.1. Project Justification	19
2.2. Southern Enterprise Area Review	20
2.3. Key Features of Site and Surrounds.....	22
2.4. Cumulative Impacts with Future Projects	25
2.5. Agreements with Other Parties	27
2.6. Feasible Alternatives.....	27
3. Project Description	30
3.1. Project Overview.....	30
3.2. Detailed Description	31
4. Statutory Context	36
4.1. Statutory Requirements	36
4.2. Pre-Conditions	38
4.3. Mandatory Considerations	39
5. Community and Stakeholder Engagement.....	42
5.1. Engagement Carried Out.....	42
5.2. Government Agencies and Other Stakeholders	42
5.3. Community Views	47
5.4. Engagement to be Carried out.....	47
6. Assessment of Impacts	49
6.1. Detailed Assessment Impacts	49
6.2. Standard Assessment Impacts	63
7. Justification of the Project	75
7.1. Project Design.....	75
7.2. Strategic Context	76
7.3. Statutory Context	76
7.4. Community Views	76
7.5. Likely Impacts of the Proposal.....	77
7.6. Suitability of the Site	77
7.7. Public Interest	77
Disclaimer.....	79
 Appendix A SEARS Table	
Appendix B Detailed Maps and Plans	
Appendix C Statutory Compliance Table	
Appendix D Community Engagement Table	
Appendix E Mitigation Measures Table	
Appendix F CIV Estimate Report	
Appendix G Architectural Plans	

Appendix H	Built Form and Urban Design Report
Appendix I	VPA Letter of Offer
Appendix J	Engagement and Communications Outcomes Report
Appendix K	Landscape Report and Plans
Appendix L	Design Excellence Strategy
Appendix M	Traffic Impact Assessment and Green Travel Plan
Appendix N	Clause 4.6 Variation Request
Appendix O	Detailed Site Investigation
Appendix P	Remediation Action Plan
Appendix Q	Interim Audit Advice
Appendix R	BDAR Waiver
Appendix S	Noise and Vibration Assessment
Appendix T	Civil Engineering Report
Appendix U	CPTED Report
Appendix V	Groundwater Impact Assessment Report
Appendix W	Waste Management Plans
Appendix X	Ecological Sustainable Design Report
Appendix Y	Aboriginal Cultural Heritage Assessment Report
Appendix Z	Historical Archaeology Impact Assessment
Appendix AA	Heritage Impact Assessment
Appendix BB	Social Impact Assessment
Appendix CC	BCA and DDA Statement
Appendix DD	Infrastructure and Utilities Reports
Appendix EE	Salinity Management Plan
Appendix FF	Acid Sulfate Soils Report
Appendix GG	Arboricultural Impact Assessment
Appendix HH	Survey Plans

FIGURES

Figure 1 Aerial Photograph.....	9
Figure 2 Proposed Concept Plan	11
Figure 3 Regional Context.....	17
Figure 4 Aerial Location Map.....	22
Figure 5 Site Photograph.....	23
Figure 6 Locality Photographs	25
Figure 7 Concept Plan	31
Figure 8 Project Area.....	32
Figure 9 Floor Plans	34
Figure 10 Concept Landscape Plan – Ground floor	35
Figure 11 Concept Envelope	50
Figure 12 Massing Diagram.....	51
Figure 13 The Proposal in the existing context	52
Figure 14 The Proposal in the future context	52
Figure 15 Current Scenario Overshadowing Plans	54
Figure 16 Future Scenario Overshadowing Plans.....	55
Figure 17 View Analysis	55
Figure 18 Indicative waste storage area layout.....	65

PICTURES

Picture 1 View of 26 Bourke Road to the east.....	25
Picture 2 View of Bourke Road to the west	25
Picture 3 29 Bourke Road to the west of the site	25
Picture 4 view of the site from the east along Bourke Road.....	25



TABLES

Table 1 Applicant Details	14
Table 2 Site Details.....	17
Table 3 Key Features of Site and Locality.....	23
Table 4 Approved and Likely Future Developments	26
Table 5 Project Alternatives.....	28
Table 6 Project Details.....	30
Table 7 Floor by Floor Breakdown of Uses	33
Table 8 Identification of Statutory Requirements for the Project.....	36
Table 9 Pre-Conditions	38
Table 10 Mandatory Considerations.....	39
Table 11 Stakeholder Engagement: Issues and Responses	42
Table 12 Traffic Generation	56
Table 13 Potential Groundwater Impacts and Mitigation Measures.....	60
Table 14 Pollutant Reduction Targets	62
Table 15 SIA Methodology	70
Table 16 Summary of Potential Social Impacts.....	71

SIGNED DECLARATION

Project details			
Project name	Alexandria Health Centre		
Application number	SSD-38600121		
Address of the land in respect of which the development application is made	28-32 Bourke Road, Alexandria		
Applicant details			
Applicant name	Alexandria Property Development Pty Ltd c/o Urbis		
Applicant address	Level 10, 50 Berry Street, North Sydney NSW 2060		
Details of people by whom this EIS was prepared			
Names and professional qualifications	Andrew Harvey Bachelor of Planning (Honours), UNSW	Vijay Prabhu Master of Urban and Regional Planning, University of Sydney	Georgia McKenzie Bachelor of City Planning (Honours), UNSW
Address	Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000		
Declaration			
<p>The undersigned declares that this EIS:</p> <ul style="list-style-type: none"> has been prepared in accordance with Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2021</i>; contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; does not contain information that is false or misleading; addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; has been prepared having regard to the Department's <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i>; contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; contains a consolidated description of the project in a single chapter of the EIS; contains an accurate summary of the findings of any community engagement; and 			

- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.

Signatures	 Andrew Harvey, Director	 Vijay Prabhu, Associate Director	 Georgia McKenzie, Consultant
Date	6 July 2022		

GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Reg	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
CEEC	Critically Endangered Ecological Community
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
CTMP	Construction Traffic Environmental Plan
DCP	Development Control Plan
DPE	NSW Department of Planning and Environment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
LEP	Local Environmental Plan
MNES	Matters of National Environmental Significance
NRAR	Natural Resource Access Regulator
OEMP	Operational Environmental Management Plan
PBP	Planning for Bushfire Protection
PCT	Plant Community Type
POM	Plan of Management

Reference	Description
PSI	Preliminary Site Investigation
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Site	28 Bourke Road, Alexandria and 30-32 Bourke Road Alexandria legally described as Lot 3 in Deposited Plan 324707 and Lots 1 & 2 in Deposited Plan 324707
SSD	State Significant Development
SSDA	State Significant Development Application
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIS	Vegetation Integrity Score
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared on behalf of Alexandria Property Development (the Applicant) in support of a Stage 1 Concept State Significant Development Application (SSDA) for the site at 28-32 Bourke Road, Alexandria.

The proposed future use of the site as a mental health hospital and medical centre will provide a key piece of community infrastructure which will provide critical mental health services to the broader community. The facility will provide unique services targeted at privately insured patients aged 18+ with mood disorders, anxiety disorders, and those with comorbid drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients. The project will deliver significant economic benefits by creating 700 jobs in construction and 480 full time jobs in operation. Allied health related jobs will be delivered across the balance of the site. The proposal will provide a large investment in infrastructure spending and developer contributions.

As the proposal is for the purposes of a 'hospital' and 'medical centre' and will have a capital investment value of over \$30 million, it is classified as a State Significant Development (SSD) under Clause 14 of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021*. In accordance with the requirements under Clause 7.20(2)(b) of SLEP 2012 and Section 4.23 of the EP&A Act, a staged approval process is sought as follows:

- Stage 1 (Concept Development Application): Under Division 4.4 of the EP&A Act, a concept SSDA is lodged seeking to outline the concept proposal and concept building envelope. No physical works are proposed by way of this Concept State Significant Development Application (Concept SSDA) – the subject of this SSDA.
- Competitive Design Process: As the height of the concept envelope exceeds 25m it is acknowledged that SLEP 2012 requires both a Concept DA and competitive design process prior to determination of a detailed design DA. A competitive design process will be unique for this type of project and will align with the City of Sydney's and Government Architect of NSW design excellence framework. The Applicant is seeking to engage with DPE, GANSW and Council to prepare a competition brief during the assessment of this Concept SSDA such that the competitive design process can be run shortly following the approval of this application.
- Stage 2 (Detailed Development Application): will seek consent for the detailed design of the proposed hospital and medical centre.

An aerial photograph of the site is provided at Figure 1 below.

Figure 1 Aerial Photograph



Source: Urbis 2022

Strategic Need

The proposal responds positively to the aims and objectives of the City of Sydney's Local Strategic Planning Statement (LSPS) and recent Southern Enterprise Area Review in that it will increase the amount of employment floor space in North Alexandria while also facilitating the dedication of land so that development can be supported by a legible network of public streets, lands and open space and retain the distinct, fine grain low-scale built form of north Alexandria.

Green Square has seen rapid population growth, and is becoming the strategic centre of South Sydney centred on the train station, public square, library and future commercial and retail precinct. The proposed development will provide an essential mental health hospital and medical centre for allied health providers to support the rapid growth in the surrounding precinct.

The site is located within the North Alexandria precinct which is an evolving business precinct facilitated by amendments to the planning controls sought by way of the Southern Employment Lands Review. The proposal will deliver a new, purpose-built hospital and medical centre which will support the role of the southern enterprise area as a modern employment precinct. Maintaining a strong economic position relies on a sustained supply of suitable floor space to accommodate new high value industries and the changing needs of businesses.

Very strong pent-up demand for social infrastructure

Mental health disease is one of the fastest growing segments across Australia's health industry. Prior to covid, expenditure on private psychiatric admissions had grown at 6.5% per annum over previous 5 years, and covid is expected to lead to a further increase in awareness and demand for these services.

The Inner City and Eastern Suburbs of Sydney comprise a large and diverse catchment with very high rates of private health insurance penetration as well as significant numbers of psychiatrists. However, there is only one dedicated psychiatric hospital (Healthscope's Sydney Clinic with 44 beds) as well as 20 'adolescent' beds at St Vincent's Darlinghurst. Hence, over 70% of patients, estimated to be over 3,000 patients annually, seeking in-hospital mental health treatment need to go outside of the catchment for an inpatient admission. Therefore, the site and proposed development are perfectly located to respond to the pent up, high demand for the proposed social infrastructure.

The Proposal

Following a review of alternate locations, the site was identified as being the most suitable location for the proposed Mental Health Hospital and medical centre and the concept envelope presents the optimal outcome for the following reasons:

- The proposal facilitates the orderly and efficient use of the site and represents sustainable development
- The development is permitted within the B7 Business Park Zone and is consistent with the relevant zone objectives
- The proposed development responds to the need to provide modern employment opportunities in northern Alexandria to support the development of the area under the Southern Enterprise Area Review.
- The site benefits from access to the regional road network and sustainable transport modes
- The proposal is compatible with surrounding development and will result in minimal impact on the environment, subject to implementation of suitable mitigation measures
- The proposal will not result in unreasonable environmental impacts as discussed in this report.

The proposal will be undertaken in accordance with the Architectural Plans prepared by NBRIS at **Appendix G**. The proposed concept plan is provided at Figure 2.

Figure 2 Proposed Concept Plan



Source: NBRS

Development consent is sought for a concept proposal for the 'Alexandria Health Centre' comprising medical centre uses and anchored by a mental health hospital. Specifically, the application seeks concept approval for:

- In principle arrangements for the demolition of existing structures on the site and excavation to accommodate a single level of basement car parking (partially below ground level).
- A building envelope to a maximum height of 45 m (RL 53.41) (including architectural roof features and building plant). The podium will have a maximum height of RL 28.41.
- A maximum gross floor area of 11,442.20 sqm, which equates to a maximum FSR of 3.85:1. The total FSR will comprise a base FSR of 2:1, a community infrastructure bonus FSR of 1.5:1 and a 10% design excellence bonus FSR (subject to a competitive design alternatives process).
- Indicative use of the building as follows:
 - Mental health hospital at levels 5-7.
 - Medical centre occupied by allied health providers at levels 1-4; and
 - Ground level reception/lobby and pharmacy.
- Principles for future vehicular ingress and egress from Bourke Road along the site's western frontage.
- Subject to agreement on a public benefit offer submitted with this application (**Appendix I**), the proposal includes the indicative dedication of the following land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft DCP):
 - A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening

- A 3m wide lane along the site's western boundary contributing towards a 6m wide lane (it is noted that the concept proposal will allocate an additional 3 m strip of land within the site along the western boundary to enable two-way vehicle movement into and out of the site).
- A 3m wide lane along the site's southern boundary, contributing towards a 9m wide lane.

The proposed mental health hospital and medical centre is likely to cater for:

- Short stay, intensive inpatient hospital admission focused on assessment, treatment initiation and stabilisation or detox, and discharge planning
- Step-down outpatient day group programs delivered either in a group setting or via telehealth
- Case management and in-home care provided by a multidisciplinary team
- Telehealth, digital and peer support programs to provide ongoing support.

Consultation

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Adjoining landowners and occupants;
- Government, agency and utility stakeholders

The outcomes of the community and stakeholder engagement have been incorporated into the proposed development and are discussed in detail at **Section 5** of this EIS.

Justification of the Project

This EIS assesses the development as proposed with regard to relevant planning instruments and policies, and outlines the mitigation measures to ensure the project does not result in unreasonable or adverse environmental effects. Additionally, the proposed development satisfies the Secretary's Environmental Assessment Requirements (SEARs) issued on 7 April 2022 (SSD-38600121).

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts in **Section 6**. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated.

The proposal represents a positive development outcome for the site and surrounding area for the following reasons:

- **The proposal is consistent with state and local strategic planning policies:**

The proposal is consistent with the relevant goals and strategies contained in:

Greater Sydney Region Plan: A Metropolis of Three Cities

Our Greater Sydney 2056: Eastern City District Plan

NSW State Priorities

Sydney Local Strategic Planning Statement

Southern Enterprise Area Review

- **The proposal satisfies the applicable local and state development controls:**

The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including

Environmental Planning and Assessment Act 1979

NSW Biodiversity Act 2016

Environmental Planning Assessment Regulation 2021

State Environmental Planning Policy (Planning Systems) 2021

State Environmental Planning Policy (Transport and Infrastructure) 2021

State Environmental Planning Policy (Biodiversity and Conservation) 2021.

Sydney Local Environmental Plan 2012 (SLEP 2012).

Sydney Development Control Plan 2012 (SDCP 2012).

Southern Enterprise Area Review LEP and DCP amendments.

- **The design responds appropriately to the opportunities and constraints presented by the site:**

The subject site is in a strategic location in northern Alexandria, adjacent to Green Square Town Centre and Green Square Railway Station. Northern Alexandria has been identified as an area that will support Green Square through the delivery of employment generating uses, which will see a shift from light industrial to knowledge-based uses. The proposal facilitates the orderly and efficient use of the site and will provide an easily accessible piece of community infrastructure to service the broader community.

- **The proposal is highly suitable for the site:**

The development is permitted with consent in the B7 Business Park Zone and is consistent with the relevant zone objectives. The site benefits from access to the regional road network and sustainable transport modes and is compatible with the surrounding development. Subject to the implementation of appropriate mitigation measures the proposal will result in minimal environmental impact.

The site is well serviced by existing and future public transport infrastructure. The site is also well placed to leverage off planned road infrastructure improvements including the Green Square to Ashmore Connector which is a new transport corridor that will connect Botany Road and Geddes Avenue in the Green Square town centre with Bowden Street in Alexandria.

The Southern Enterprise Area Review is accompanied by a range of documents including an amendment to the Sydney Development Control Plan 2012 to deliver public domain improvements such as future laneways, and increased footpath widths in the immediate vicinity of the site.

- **The proposal is in the public interest:**

The proposed use of the site as a hospital and medical centre will provide a key piece of community infrastructure and will service the broad community. The facility will provide unique services targeted at privately insured patients aged 18 + with mood disorders. Anxiety disorders, and those with comorbid drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients.

Mental health disease is one of the fastest growing segments across Australia's health industry. Prior to covid, expenditure on private psychiatric admissions had grown at 6.5% per annum over previous 5 years, and covid is expected to lead to a further increase in awareness and demand for these services.

The Inner City and Eastern Suburbs of Sydney comprise a large and affluent catchment with very high rates of PHI penetration as well as significant numbers of psychiatrists. However, there is only one dedicated psychiatric hospital (Healthscope's Sydney Clinic with 44 beds) as well as 20 'adolescent' beds at St Vincent's Darlinghurst. Hence, over 70% of patients, estimated to be over 3,000 patients annually, seeking in hospital mental health treatment need to go outside of the catchment for an inpatient admission. Therefore, the operator believes that Inner Sydney is a prime location to establish a new short stay psychiatric service.

In view of the above, it is considered that this SSD Application has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. INTRODUCTION

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

1.1. APPLICANT DETAILS

The applicant details for the proposed development are listed in **Table 1**.

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	Alexandria Property Development Pty Ltd on behalf of Centuria Healthcare Property Services c/o Urbis
Postal Address	Level 10, 50 Berry Street, North Sydney NSW 2060
ACN	657 387 178
Nominated Contact	Georgia McKenzie, gmckenzie@urbis.com.au , (02) 8233 9965

1.2. PROJECT OBJECTIVES

The proposed future use of the site as a mental health hospital and medical centre will provide a key piece of community infrastructure which will provide critical mental health services to the broader community. The facility will provide unique services targeted at privately insured patients aged 18+ with mood disorders, anxiety disorders, and those with comorbid drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients. The project is likely to deliver significant economic benefits by creating additional job opportunities both during construction and operation.

The Applicant has engaged NBRS, an architecture firm that specialises in the design of health facilities including hospitals as the lead architect for the project at this Concept DA stage. The reference scheme has been designed to assist with the development of a Concept DA envelope, drawing together a number of the specific health and service-related needs of the project, and balancing this against the key planning controls applicable to the site.

The Concept DA envelope will provide a framework for a future competitive design process, which will be complemented by detailed health planning advice for competitors, aligned with the needs of the future operator.

1.3. PROJECT DESCRIPTION

This application is a Concept Development Application (Concept SSDA) under Division 4.4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), and as such seeks to outline the concept proposal for the site at 28-32 Bourke Road Alexandria, for which a detailed proposal will be the subject of a future detailed Stage 2 State Significant Development Application (SSDA). No physical works are proposed by way of this CDA.

Pursuant to Section 4.23 of the EP&A Act, this Concept Development Application satisfies the requirement for a development control plan required under Clause 7.20(2)(b) of the SLEP 2012.

Development consent is sought for a concept proposal for the 'Alexandria Health Centre' comprising medical centre uses and anchored by a mental health hospital. Specifically, the application seeks concept approval for:

- In principle arrangements for the demolition of existing structures on the site and excavation to accommodate a single level of basement car parking (partially below ground level).

- A building envelope to a maximum height of 45 m (RL 53.41) (including architectural roof features and building plant). The podium will have a maximum height of RL 28.41.
- A maximum gross floor area of 11,442.20 sqm, which equates to a maximum FSR of 3.85:1. The total FSR will comprise a base FSR of 2:1, a community infrastructure bonus FSR of 1.5:1 and a 10% design excellence bonus FSR (subject to a competitive design alternatives process).
- Indicative use of the building as follows:
 - Mental health hospital at levels 5-7.
 - Medical centre uses levels 1-4; and
 - Ground level reception/lobby and pharmacy.
- Principles for future vehicular ingress and egress from Bourke Road along the site's western frontage.
- Subject to agreement on a public benefit offer submitted with this application (**Appendix I**), the proposal includes the indicative dedication of the following land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft DCP):
 - A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening
 - A 3m wide lane along the site's western boundary contributing towards a 6m wide lane (it is noted that the concept proposal will allocate an additional 3 m strip of land within the site along the western boundary to enable two-way vehicle movement into and out of the site).
 - A 3m wide lane along the site's southern boundary, contributing towards a 9m wide lane.

The proposed mental health hospital and medical centre are likely to cater for:

- Short stay, intensive inpatient hospital admission focused on assessment, treatment initiation and stabilisation or detox, and discharge planning
- Step-down outpatient day group programs delivered either in a group setting or via telehealth
- Case management and in-home care provided by a multidisciplinary team
- Telehealth, digital and peer support programs to provide ongoing support.

The proposed development is for a 'hospital' and 'medical centre' and has an estimated capital investment value of over \$30 million (refer to **Appendix F**) and accordingly, the proposal is classified as an SSD under Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* clause 14(c):

Development that has a capital investment value of more than \$30 million for any of the following purposes—

(a) hospitals,

(b) medical centres,

(c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).

The site information relevant to the project is provided in

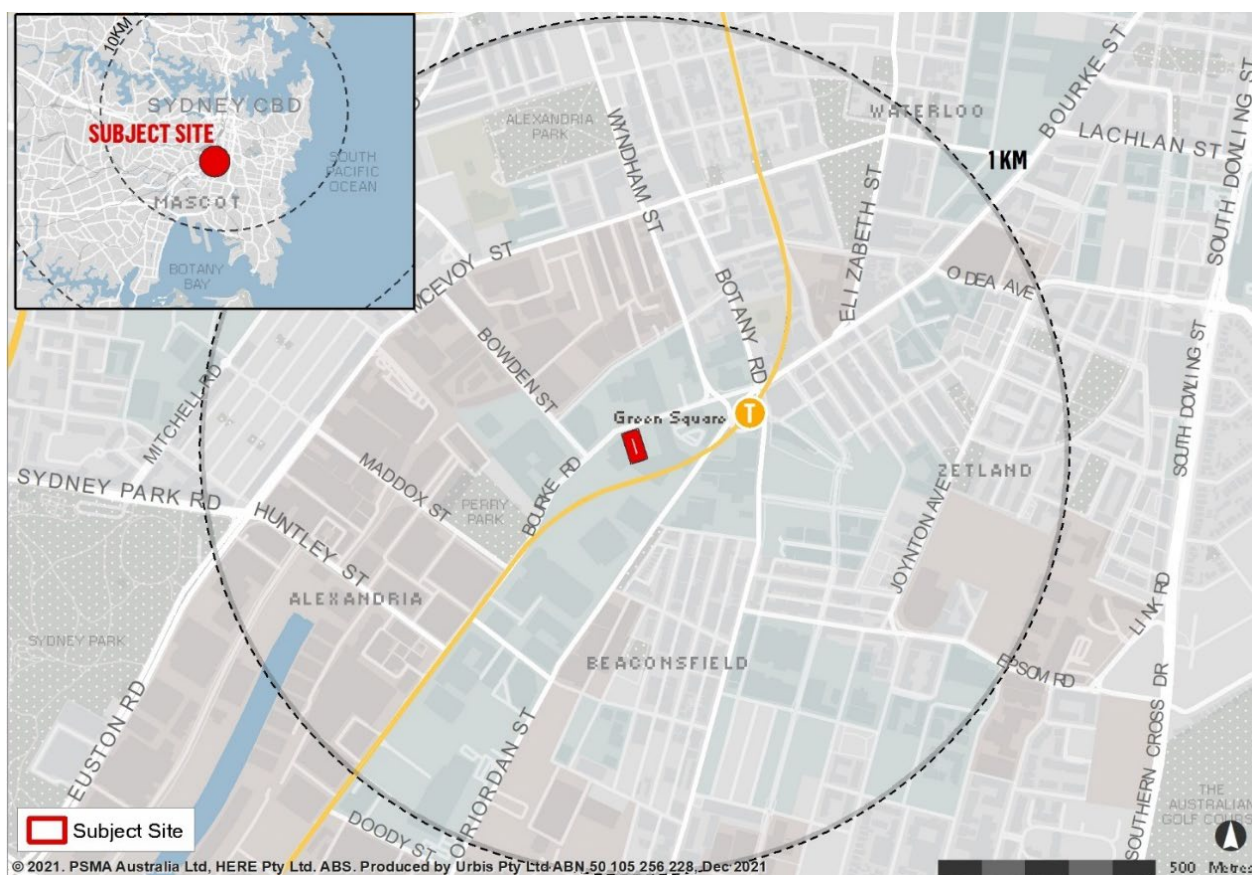
Table 2. A detailed description of the key features of the site and locality is provided in **Section 2.3** of this report.

Table 2 Site Details

Descriptor	Site Details
Street Address	28- 32 Bourke Road, Alexandria
Legal Description	28 Bourke Road, Alexandria – Lot 3 in Deposited Plan 324707 30-32 Bourke Road, Alexandria - Lots 1 & 2 in Deposited Plan 324707
Site Area	2972m ²

A map of the site in its regional setting is provided in the figure below.

Figure 3 Regional Context



Source: Urbis

1.4. PROJECT BACKGROUND

The City of Sydney's online DA tracker does not contain records of any significant Development Applications lodged or determined for the Site in recent years.

The site at 28-32 Bourke Road currently contains a one storey warehouse building used for the purpose of vehicle repairs. The surrounding context consists of similar structures utilised for light industrial purposes.

The proposed development responds to the need to provide modern employment opportunities in northern Alexandria to support the development of the area under the Southern Enterprise Area Review. The Enterprise Area Review identifies that Northern Alexandria will support the already shifting character from industrial to knowledge-based sectors. The subject site was chosen for its strategic location which is close to the Green Square Town Centre.

The proposed use of the site as a multi-purpose health will provide a key piece of community infrastructure which will service the broader community. The facility will provide unique services targeted at privately insured patients aged 18 + with mood disorders, anxiety disorders, and those with comorbid drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients.

2. STRATEGIC CONTEXT

This section of the EIS describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project, each of which are addressed in further detail in **Section 7** of this EIS.

2.1. PROJECT JUSTIFICATION

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

2.1.1. NSW State Priorities

NSW State Priorities is the State Government's plan to guide policy and decision making across the state.

The proposal is consistent with the key objectives contained within the plan, including:

- The proposal will generate temporary employment opportunities in manufacturing, construction, and construction management during the project's construction phase of works. The proposal will also generate key employment opportunities for health care workers during its operational phase.
- The proposal will provide a new facility catered to improving the health system. It will provide inpatient and outpatient care to those suffering with mood disorders, anxiety disorders and those with drug and alcohol disorders.
- The NSW State Priorities aims to reduce potentially preventable visits to hospital by five percent through to 2023. The proposed facility will provide essential support to community members in need and assist them with rehabilitation.
- Another of the NSW State Priorities is to reduce the rate of suicides in NSW by 20% by 2023. The proposed development will directly assist those suffering from mood and anxiety disorders as well as those with drug and alcohol disorders. The proposal will thus provide support for vulnerable people and will aim to assist in reducing the rate of suicide in the area.

The proposal is a key asset to improving the NSW Health System by providing specially catered inpatient and outpatient services for community members in need.

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

The Greater Sydney Region Plan provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability. The following matters are relevant to the proposed development:

- The proposed development will provide a critical new hospital and medical centre to support the future growth of the community.
- The proposal will support the shift of the northern Alexandria precinct from primarily industrial uses to a knowledge-based economy. The proposal will therefore assist in the development of internationally competitive health, education, research, and innovation precincts across greater Sydney.
- The proposal will assist in providing services and infrastructure to support communities changing needs, ensuring that communities are healthy, resilient and socially connected.

The proposal is therefore consistent with the vision of the Greater Sydney Region Plan in that it will provide essential local infrastructure to service the community and support local and regional growth.

2.1.3. The Eastern City District Plan

The *Eastern City District Plan* (District Plan) is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent

of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The planning priorities and actions likely to have implications for the proposed development are listed and discussed below:

- Planning Priority E1: Planning for a city supported by Infrastructure
- Planning Priority E3: Providing services and social infrastructure to meet people's changing needs
- Planning Priority E8: Growing and investing in health and education precincts and the Innovation Corridor
- Planning Priority E11: Growing investment, business opportunities and jobs in strategic centres

The district plan identifies the following points that are relevant to the site and project:

- Health facilities are classified as essential community infrastructure. Providing accessible local health services and regional health infrastructure such as hospitals is important for all people across the district.
- The co-location of facilities such as health services, schools, community and cultural facilities, parks and recreation can be the focus of neighbourhoods.

2.1.4. Sydney Local Strategic Planning Statement

City Plan 2036 is the Local Strategic Planning Statement (LSPS) for the City of Sydney. The LSPS identifies that a key vision of the Greater Sydney Region Plan is to have health facilities located within 30 minutes of residents. Green Square and the City South Village is the City's largest village, and encompasses the bustling, high density urban renewal area of Green Square, the quieter residential streets of Rosebery, and the enterprise and urban services precincts in Alexandria and Rosebery. Green Square has seen rapid population growth, and is becoming the strategic centre of South Sydney centred on the train station, public square, library and future commercial and retail precinct. The proposed development will provide an essential community health facility in the form of a hospital and medical centre to support the rapid growth in the surrounding precinct.

The LSPS also identifies the importance of co-locating services, including health services, to create main activity spines. With the construction of the proposed new Green Square to Ashmore Connector nearby to the subject site, Bourke Road will become a new thoroughfare, linking the community to services.

2.2. SOUTHERN ENTERPRISE AREA REVIEW

The *Sydney Local Environmental Plan 2012* (SLEP 2012) is the principal planning instruments relevant to development on the site. The *Sydney Development Control Plan 2012* (SDCP 2012) also applies to the site and provides more detailed locality/land use specific development guidelines.

Council is in the process of reviewing the planning controls that apply to the Southern Enterprise Area, which includes the subject site, as set out in the following documents which were publicly exhibited between 15 November and 13 December 2021:

- Planning proposal PP-2021-4808 to amend Sydney Local Environmental Plan 2012
- Draft Sydney Development Control Plan 2012 – Southern Enterprise Area.

The following section provides an overview of the key amendments sought via the Southern Enterprise Area review that would apply to any future development on the subject site.

Planning Proposal PP-2021-4808 Enterprise Area Review

This planning proposal responds to the need to increase the amount of employment floor space in North Alexandria while also facilitating the dedication of land so that development can be supported by a legible network of public streets, lands and open space and retain the distinct fine grain low-scale built form to the

north of north Alexandria. The review also determined that there was potential for North Alexandria to fulfil unmet demands in regard to commercial and flexible employment space.

The planning proposal amends controls to facilitate new employment floor space at North Alexandria and will support the role of the southern enterprise area as a modern employment precinct. Maintaining a strong economic position relies on a sustained supply of suitable floor space to accommodate new high value industries and the changing needs of businesses.

In relation to the subject site, the planning proposal seeks to increase the maximum height of building control from 35m to 45m.

As described below, the planning proposal is accompanied by amendments to SDCP 2012 which provides for enhanced community infrastructure applicable to the subject site.

The Concept SSDA envelope seeks to fully align with the draft LEP and DCP controls to be amended as part of the Southern Enterprise Corridor.

It is noted that the LEP amendment has been through public exhibition, has been endorsed by Council and gazettal is imminent with the LEP currently with DPE and Parliamentary Counsel. The proposal is directly aligned with the Amendment. A Clause 4.6 Variation Request has been prepared to support the technical non-compliant building height at the time of submission. However it is noted, given the certain and imminent gazettal of the LEP amendment, it is likely the Clause 4.6 will be made redundant during the assessment of the proposal.

Draft Sydney Development Control Plan 2012: Southern Enterprise Area Amendment

Council has prepared the Draft Sydney Development Control Plan 2012: Southern Enterprise Area Amendment (Draft SDCP2012 Amendment) that provides additional guidance for development in the southern enterprise area.

The Draft SDCP2012 Amendment includes new provisions of streets and lanes, setback at ground level and upper levels, proposed open space dedications and height in storeys in North Alexandria. It also includes other changes to refresh planning controls in the southern enterprise area to reflect development and policy changes that have occurred over time.

The proposal seeks to align with relevant controls within the Draft SDCP2012 Amendment and is reliant on these public domain works forming part of an offset for community infrastructure contributions by way of land dedication.

The key amended DCP controls that have guided the design of the concept SSDA envelope include:

- **5.8.7.2 – Public Domain Setbacks:** A 2.4m wide strip of land within the subject site to be dedicated to the City of Sydney along the site's frontage to Bourke Road for the purpose of footpath widening
- **5.8.7.2 – New Streets, Lanes and through-site links:**
 - A 3m wide laneway dedication along the site's western boundary
 - A 3m wide laneway dedication along the site's southern boundary
- **5.8.4.2 – Street Frontage Height:** 4 storeys
- **5.8.4.3 – Setbacks for buildings:**
 - Along Bourke Road - 12 m upper-level setback
 - Along rear boundary of the site - 4 m upper-level setback

The post-exhibition Enterprise Area Review Planning Proposal and draft DCP amendment were presented to Council at a meeting on 9 May 2022.

In line with the officer recommendation, Council resolved to:

- approve the planning proposal to be sent to DPE to be made as a local environmental plan under Section 3.36 of the EP&A Act 1979.
- Approve the Sydney DCP 2012: Southern Enterprise Area Amendment to come into effect on the date of publication of the subject LEP in accordance with Clause 21 of the EP&A Regulation 2000.

It is anticipated that the LEP will be finalised by mid-September 2022, and the Southern Enterprise Area LEP and DCP will come into effect, following which the new built form controls (including height of buildings) will apply to the site.

2.3. KEY FEATURES OF SITE AND SURROUNDS

2.3.1. Site Description

The site is located at 28- 32 Bourke Road, Alexandria, within the Sydney local government area (LGA). The site is legally described as Lot 1-3 in Deposited Plan 324707. The location of the site is illustrated in **Figure 4**. Photographs of the current site condition are provided in **Figure 5**.

Figure 4 Aerial Location Map



Source: Urbis

Figure 5 Site Photograph



Source: Urbis

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in the table below.

Table 3 Key Features of Site and Locality

Descriptor	Site Details
Topography	The site is generally flat in nature at RL8.51 at the northern frontage to Bourke Road, gently rising to RL9.06 at the southern rear boundary.
Land Configuration	The site is generally rectangular in shape comprising a 40m frontage to Bourke Road and rear boundary, and approximately 73m side boundary to adjoining properties.
Land Ownership	Centuria Prime Partnership No.2 Pty Limited as trustee for Prime Healthcare Alexandria Sub Trust.
Existing Development	The site currently accommodates a single storey warehouse building used for the purpose of vehicle repairs.
Public Transport Infrastructure	The site is highly accessible to both bus and rail services. The site is approximately 300m from Green Square Railway Station and approximately 320m from the high frequency bus services on Botany Road that provides connections through the Metropolitan Transport Network.
Existing and Future Road Networks	The future Green Square to Ashmore Connector Road is also proposed to be constructed in vicinity to the subject site. The Green Square to Ashmore Connector (GS2AC) is a new transport corridor that will connect Botany Road and Geddes Avenue in the Green Square town centre with Bowden Street in Alexandria. The GS2AC (current revised concept plan) comprises a 380m road that runs from Botany Road to Bowden Street via O'Riordan Street and Bourke Road, with two (2) new signalised intersections and upgrade works to the existing Botany Road / Geddes Avenue signalised intersection.

Descriptor	Site Details
Site Access	Site access is currently provided off Bourke Road. There is currently one vehicle access point at 28 Bourke Road and another for 30-32 Bourke Road.
Easements	<p>The certificates of title for Lot 1, 2, and 3 in Deposited Plan 324707 identifies the following easements registered on title summarised as follows:</p> <ul style="list-style-type: none"> Lot 1 DP 324707 - A right-of-way easement is located between lots 1 and 2 to enable the use of the two lots. Lot 2 DP 324707 - A right-of-way easement is located between lots 1 and 2 to enable the use of the two lots
Acid Sulfate Soils	Class 3 Acid Sulfate Soils
Stormwater and Flooding	The subject site is located within the Alexandra Canal – Sheas Creek Catchment.
Flora and Fauna	The subject site is devoid of vegetation. Two street trees are located within the road reserve directly adjoining the site along Bourke Road. Note one street tree is planned for removal in accordance with Sydney DCP 2012.
Heritage	The subject site is not within a heritage conservation area, nor is it a heritage listed item or nearby to a heritage listed item.

It is noted that the site currently comprises three separate lots. It is anticipated that the consent authority will require the eventual consolidation of the lots prior to the issue of an occupation certificate for development on the site. It is anticipated that this will be further addressed as part of the conditions of consent of the future detailed SSDA to be submitted separately to DPE for the detailed design of the development.

2.3.2. Site Context and Surrounding Development

The subject site is located within the northern Alexandria precinct as identified in the Southern Enterprise Area Review. North Alexandria is located on the northern edge of the southern enterprise area and is close to Sydney CBD and large population centres. The subject site also at the western gateway to the new Green Square town centre and Green Square Railway station.

The surrounding locality is described below:

- **North:** of the site are various light industrial and retail uses. A NSW Fire and Rescue facility is also located north of the site.
- **East:** directly adjoining the site is 26 Bourke Road comprising a single storey warehouse building. Further east is the Green Square Town Centre. The town centre contains critical pieces of infrastructure such as Green Square Railway Station, Green Square Infinity Health and Medical Centre, Green Square Library and various other commercial/ retail uses.
- **South:** of the site are industrial and commercial uses as well as small lot residential properties. To the south east of the site is the new Gunyama Park Aquatic and Recreation centre
- **West:** of the site is 34-42 Bourke Road comprising a two storey warehouse building owned and operated by City of Sydney Council. Further West of the site is Sydney Park which is adjacent to St Peters Station.

Photographs of the surrounding land uses are provided in the figure below.

Figure 6 Locality Photographs



Picture 1 View of 26 Bourke Road to the east



Picture 2 View of Bourke Road to the west



Picture 3 29 Bourke Road to the west of the site

Source: JohnStaff



Picture 4 view of the site from the east along Bourke Road

2.4. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The site is located within northern Alexandria. There are numerous key developments occurring around the subject site, which reflects the overarching vision for the renewal of Green Square and the establishment of knowledge-based sectors in North Alexandria. The impacts of this additional employment intensification has been well considered in the assessment of Planning Proposal PP-2021-4808. Various technical reports have been prepared and assessed in Section 6 of this EIS. It is concluded that no cumulative impacts will create barriers to future development at the site.

Green Square Urban Renewal

The Green Square Urban Renewal project is one of the most significant projects occurring across New South Wales. The proposal includes the development of a new Town Centre and ancillary community infrastructure, whilst respecting the heritage character of the area and committing to sustainable design.

North Alexandria sits in the Green Square Urban Renewal Area, which will contribute over one third of the City's local housing growth to 2036. The urban renewal area is forecast to grow to around 32,000 dwellings, housing around 60,000 to 70,000 people (depending on occupancy trends) at build out. To support this

growth \$540 million has been committed to the precinct for the provisioning of world class community facilities. These include a new library and plaza, aquatic centre, parks, playgrounds, childcare centre and a new primary school.

The surrounding areas of Green Square are expected to experience significant uplift in to support the new town centre. This is identified in the Southern Enterprise Area Review which calls out north Alexandria as a key precinct which will shift in character from light industrial to commercial and knowledge intensive sectors to support Green Square. The proposed development will provide a new hospital and medical centre to support the expected growth of the precinct.

The proposed development at 28-32 Bourke Road is in close proximity to the new Green Square Town Centre and will contribute to the provisioning of essential health infrastructure to support the growth of the precinct.

Green Square to Ashmore Connector

The Green Square to Ashmore Connector (GS2AC) is a new transport corridor that will connect Botany Road and Geddes Avenue in the Green Square town centre with Bowden Street in Alexandria. The GS2AC (current revised concept plan) comprises a 380m road that runs from Botany Road to Bowden Street via O'Riordan Street and Bourke Road, with two (2) new signalised intersections and upgrade works to the existing Botany Road / Geddes Avenue signalised intersection. The road features a single traffic lane in each direction to be dedicated as a public transport corridor (bus lanes) with local traffic access to adjacent properties. The road also features an on-road two-way cycle path which connects to the existing east-west cycle paths on Bowden Street and Geddes Avenue and provides interchange with the existing north-south cycle path on Bourke Road. Local vehicle access would be allowed for properties along the GS2AC which are to be developed in the future. The GS2AC is expected to open in 2022. The renewal of adjoining lands for affordable housing and employment-based land uses would be completed within or near this time and the Proposal would support these future land uses.

This road is only to be used by local and emergency vehicles, public transport, pedestrians, and cyclists. By prioritising walking, riding and public transport, this transport link will provide an important and attractive east-west connection for people, while also discouraging traffic in Sydney's densest area.

The GS2AC will incorporate the site at 44-54 Bourke Road, Alexandria approximately 80m west of the subject site. The proposal will not hinder accessibility to the subject site, rather it will provide improved access to public transport, emergency services and active transport movement throughout one of Sydney's most heavily trafficked areas. The GS2AC also encompasses the installation of signalised intersections including at Bourke Road, this will enhance the safety and accessibility of the subject site for pedestrians and cyclists.

D/2019/817 - D/2021/977 23-27 Bourke Road & 41-43 Bowden Street, Alexandria

On 1 August 2019 a concept DA (D/2019/817) was lodged for a building envelope to a height of 18m with indicative commercial and retail uses, and excavation for 1-2 basement levels at 23-27 Bourke Road and 41-43 Bowden Street, Alexandria. This is 200m south west of the subject site at 28-32 Bourke Road. The application was approved on 14 May 2020.

On 25 August 2021, a DA was lodged for the Stage 2 construction of the mixed use development. The application seeks consent for the demolition, remediation, tree removal and construction of a 4-storey commercial building with 179 basement car parking spaces and associated landscaping. The building includes 1,492m² of retail GFA and 16,306m² of commercial GFA. This was approved in April 2022. D/2021/977 sets a precedent for the future commercial growth in north Alexandria that is required to support a growing population.

Approved and likely future developments which may be relevant in the cumulative impact assessment of the proposal are summarised in the following table.

Table 4 Approved and Likely Future Developments

DA Reference	Development Description	Current Status
PP-2021-4262 Green Square Town Centre	The development of a new Town Centre and ancillary community infrastructure in Green Square	The proposal was determined on the 26 November 2021 and is

DA Reference	Development Description	Current Status
		currently in the Pre-exhibition stage.
PP-2021-4808 Enterprise Area Review	Planning proposal to amend Sydney Local Environmental Plan 2012 and Sydney Development Control Plan 2012.	Post exhibition Tentatively due for finalisation in September 2022
Green Square to Ashmore Connector	The GS2AC (current revised concept plan) comprises a 380m road that runs from Botany Road to Bowden Street via O'Riordan Street and Bourke Road, with two (2) new signalised intersections and upgrade works to the existing Botany Road / Geddes Avenue signalised intersection.	Under Review
D/2021/977 23-27 Bourke Road & 41-43 Bowden Street, Alexandria	The construction of the mixed-use development. The application seeks consent for the demolition, remediation, tree removal and construction of a 4-storey commercial building with 179 basement car parking spaces and associated landscaping. The building includes 1,492sqm of retail GFA and 16,306sqm of commercial GFA.	Approved April 2022

The potential cumulative impacts of the project are addressed in **Section 6** of the EIS in accordance with the *DPE Assessing Cumulative Impacts* guidelines.

2.5. AGREEMENTS WITH OTHER PARTIES

The Proponent is separately progressing a public benefit offer seeking to enter into an agreement with City of Sydney Council for the following:

- The payment of a monetary contribution towards community infrastructure contribution.
- Dedication of the following land to Council:
 - A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening.
 - A 3m wide lane along the site's western boundary.
 - A 3m wide lane along the site's southern boundary.

This is further discussed in **Section 6.2.11** and a Letter of Offer is provided at **Appendix I**.

2.6. FEASIBLE ALTERNATIVES

Clause 7 in Schedule 2 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

The Applicant identified project alternatives which were considered in respect to the identified need for the proposed hospital and medical centre. Each of these options is listed and discussed in **Table 5**.

Table 5 Project Alternatives

Option	Assessment
Option 1 – Do Nothing	This option was dismissed as the objectives of the project would not be met. If the proposal was not to proceed, the site would not realise its capacity to accommodate a hospital and medical centre which will provide a key piece of community infrastructure servicing the broader community.
Option 2 – Alternative Location	<p>Consideration to alternative sites was given, however these were dismissed as the subject site resulted in the most beneficial outcomes for the proposal and ensures the site can accommodate a hospital and medical centre uses which will provide a key piece of community infrastructure servicing the broader community as:</p> <ul style="list-style-type: none"> ▪ The site is compatible with adjoining and surrounding industry and employment generating uses within the North Alexandria precinct ▪ The potential environmental impacts of the proposal can be suitably mitigated to avoid unacceptable impacts on the amenity of nearby properties ▪ The proposal will not affect any area of heritage or archaeological significance ▪ The proposal can be developed with appropriate visual amenity given its surrounding context. <p>The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no adverse economic, environmental or social impact.</p>
Option 3 – The proposal (preferred option)	<p>The site was identified as being the most suitable location for the proposed hospital and medical centre uses and the concept envelope presents the optimal outcome for the following reasons:</p> <ul style="list-style-type: none"> ▪ The proposal facilitates the orderly and efficient use of the site and represents sustainable development. ▪ The development is permitted within the B7 Business Park Zone and is consistent with the relevant zone objectives. ▪ The proposed development responds to the need to provide modern employment opportunities in northern Alexandria to support the development of the area under the Southern Enterprise Area Review. ▪ The site benefits from access to the regional road network and sustainable transport modes

Option	Assessment
	<ul style="list-style-type: none"> ▪ The proposal is compatible with surrounding development and will result in minimal impact on the environment, subject to implementation of suitable mitigation measures ▪ The proposal will not result in unacceptable environmental impacts including in relation to ecology, biodiversity, heritage, noise and views <p>The proposed use of the site as a hospital and medical centre will provide a key piece of community infrastructure which will service the broader community. The facility will provide unique services targeted at privately insured patients aged 18 + with mood disorders. Anxiety disorders, and those with comorbid drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients.</p>

3. PROJECT DESCRIPTION

The following sections of the EIS summarise the key numeric components of the proposed development and outlines the proposal in detail.

3.1. PROJECT OVERVIEW

The key components of the proposed development are listed in the following table. A copy of the architectural concept drawings is attached at **Appendix G**, with the concept plan and floor plans provided in the figures below.

This application is a Concept Development Application under Division 4.4 of the EP&A Act, and as such seeks to outline the concept proposal for the site at 28-32 Bourke Road Alexandria, for which a detailed proposal will be the subject of a future detailed stage 2 SSDA. Pursuant to Section 4.23 of the EP&A Act, this Concept Development Application satisfies the requirement for a development control plan required under Clause 7.20(2)(b) of the SLEP2012.

The following table provides a summary of the proposal.

Table 6 Project Details

Descriptor	Project Details
Site Area	2,972m ²
Site Description	Lots 1, 2 and 3 of in Deposited Plan 324707
Project Description	This SSDA seeks consent for a concept development application for the Alexandria Health Centre, including a concept proposal for a new hospital and medical centre building and public domain works.
Gross floor area	Total GFA of 11,442.2m ² comprising an indicative mix of uses: <ul style="list-style-type: none"> ▪ Hospital – levels 5-7 ▪ Medical centre – levels 1-4 ▪ Lobby, Pharmacy and GP clinic – ground level
Floor Space Ratio	3.85:1 Base FSR - 2:1 Under Clause 6.14 – Community Infrastructure Floor Space at Green Square, an additional floor space (+1.5:1) when community infrastructure is provided – 3.5:1 Design excellence (subject to competitive design alternatives process) - additional 10% - 3.85:1
Maximum Height	RL 53.41
Capital Investment Value	\$84,176,966 (excluding GST)

Figure 7 Concept Plan



Source: NBRS

3.2. DETAILED DESCRIPTION

Development consent is sought for a concept proposal for the 'Alexandria Health Centre' comprising medical centre uses and anchored by a mental health hospital. Specifically, the application seeks concept approval for:

- In principle arrangements for the demolition of existing structures on the site and excavation to accommodate a single level of basement car parking (partially below ground level).
- A building envelope to a maximum height of 45 m (RL 53.41) (including architectural roof features and building plant). The podium will have a maximum height of RL 28.41.
- A maximum gross floor area of 11,442.20 sqm, which equates to a maximum FSR of 3.85:1. The total FSR will comprise a base FSR of 2:1, a community infrastructure bonus FSR of 1.5:1 and a 10% design excellence bonus FSR (subject to a competitive design alternatives process).
- Indicative use of the building as follows:
 - Mental health hospital at levels 5-7.
 - Medical centre uses at levels 1-4; and
 - Ground level reception/lobby and pharmacy.
- Principles for future vehicular ingress and egress from Bourke Road along the site's western frontage.
- Subject to agreement on a public benefit offer submitted with this application (**Appendix I**), the proposal includes the indicative dedication of the following land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft DCP):
 - A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening

- A 3m wide lane along the site's western boundary contributing towards a 6m wide lane (it is noted that the concept proposal will allocate an additional 3 m strip of land within the site along the western boundary to enable two-way vehicle movement into and out of the site).
- A 3m wide lane along the site's southern boundary, contributing towards a 9m wide lane.

The proposed mental health hospital and medical centre are likely to cater for:

- Short stay, intensive inpatient hospital admission focused on assessment, treatment initiation and stabilisation or detox, and discharge planning
- Step-down outpatient day group programs delivered either in a group setting or via telehealth
- Case management and in-home care provided by a multidisciplinary team
- Telehealth, digital and peer support programs to provide ongoing support.

3.2.1. Project Area

The site has a total area of 2,972m² and the entire site will be developed. The site area is shown on the plan below.

Figure 8 Project Area



Source: Urbis

3.2.2. Uses and Activities

This proposal seeks consent for the following uses on the site:

- Ground floor reception/lobby, pharmacy and GP clinic
- Medical centre uses occupied by allied health providers at levels 1-4 including approximately 40 rooms for consultation;

- Mental health hospital at levels 5-7 with approximately 56 beds.

It is noted that following the design competition and preparation of a detailed SSDA, the exact mix of tenancies will be considered in further details. Operational details will be examined during detailed design.

3.2.3. Site Access

The reference scheme indicates approximately 70-74 parking spaces can be provided on the ground and basement levels. The proposed vehicle access arrangements will comprise:

- Construction of part of the Council proposed future laneway along the southern and western sides of the site with dedication of land as required by Council's Draft DCP. The section of lane along the southern side will be 3.5m wide (with 3m to be dedicated to council as part of the VPA) and the section along the western side will be 6m wide (with 3m to be dedicated Council as part of the VPA) to enable 2-way access movement.
- Two driveway connections to the western section of lane with an ingress driveway for the Ground Level parking and Loading Dock and a combined ingress/egress driveway for the Basement car park.
- An egress driveway connection to the southern lane for the Ground Level carpark and Loading Dock.

3.2.4. Reference Scheme

Site Layout

As shown in the Architectural Plans (**Appendix G**) and Design Report (**Appendix H**) a reference scheme has been prepared to show possible development scenarios. It is noted that future development on the site will be determined through a design competition process and detailed SSD application.

The table below identifies a possible floor by floor breakdown of uses.

Table 7 Floor by Floor Breakdown of Uses

Floor	Uses
Basement	Car parking, lifts, motorbike parking
Ground Floor	Car parking, hospital lobby, loading bay, landscaping, pharmacy, GP clinic, plant space, back of house areas, laneway
Mezzanine	Plant area
Level 1	Medical centre, end of trip facilities, amenities room and circulation area.
Level 2	Medical centre and an amenities area.
Level 3	Medical centre and an amenities area.
Level 4	Medical centre and an amenities area.
Level 5	Hospital
Level 6	Hospital and landscaped courtyard
Level 7	Hospital and landscaped courtyard
Roof	Plant rooms

Design and Built Form

A ten-storey health centre is proposed, which includes five levels of medical centre uses and three levels of hospital uses. An Urban Design Report has been prepared by NBRIS (**Appendix H**) which details the urban design objectives and the reference scheme. The reference scheme incorporates extensive landscaping, amenities areas and communal areas. The building has been sited to maximise availability of natural light and ventilation.

In accordance with the Draft Sydney Development Control Plan 2012: Southern Enterprise Area Amendment, the proposal presents a four storey street wall to Bourke Road, with a 12m upper level setback, sympathetic to the surrounding streetscape. The façade of the development will be articulated using architectural elements and a variety of design languages for functional zones within building groups and will use solid surfaces which is sympathetic to the surrounding area.

Floor plans of the reference scheme are provided in the figure below.

Figure 9 Floor Plans



Ground Floor Plan

Level 1 Plan

Source: NBRIS

Laneway Dedication

Subject to further discussion and a VPA with Council on the basis of the draft VPA letter of offer to be submitted with this application, the proposal seeks concept approval for the future dedication of land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft SDCP Amendment), including:

- A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening

- It is anticipated that further discussions will occur with Council as part of the VPA discussions in relation to the future design of the laneways once Council's envisaged laneway network is fully developed.

A Landscape Plan has been prepared by Place Design Group (**Appendix K**). The proposal includes the planting of three 'ornamental pear' trees along the Bourke Road frontage and the planting of shrubs, grasses and ground covers along the frontage. The proposal also includes a landscaped courtyard on level 6 and 7 of the development, to provide calming outdoor spaces for patients of the hospital. This includes a curved seating wall, timber decking and extensive planting.

3600

1:30 DRIVE WAY

300mm WIDE PLANTER CLIMBERS TO WALL

WATCHING

300mm WIDE PLANTER CLIMBERS TO WALL

Fire Pump Room 20 m²

Substation

450mm HIGH SHALLOW PLANTER

BOURKE ROAD

Legend

- 01 3 x Proposed tree
- 02 Climbers to wall
- 03 Curved seating
- 04 Mass planting on wall
- 05 Mass planting in planter
- 06 Mulch
- 07 Existing trees to be retained
- 08 Existing trees to be removed

+ RL 10.86

+ RL 10.41

+ RL 8.44

precedent imagery

place

Place Design Group Pty Ltd
38/830-832 Elizabeth Street

0 2 4 6 8

Source: Place Design Group

4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Environmental Planning and Assessment Act 1979*
- *NSW Biodiversity Act 2016*
- *Environmental Planning Assessment Regulation 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *Sydney Local Environmental Plan 2012 (SLEP 2012)*
- *Sydney Development Control Plan 2012 (SDCP 2012)*
- *Southern Enterprise Area Review LEP and DCP amendments*

It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1. STATUTORY REQUIREMENTS

Table 8 categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines*. A detailed statutory compliance table for the modified project is provided at **Appendix C**.

Table 8 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	<p>The EP&A Act establishes the framework for the assessment and approval of development and activities in NSW. The EP&A Act also facilitates the making of environmental planning instruments which guide the way in which development should occur across the State, this is inclusive of State environmental planning policies and local environmental plans.</p> <p>Clause 4.22 of the EP&A Act sets out the conditions by which a concept development application may be considered. The consent authority when considering under section 4.15 the likely impact of the development, must only consider the likely impact of the concept proposal and does not require the consideration of the carrying out of development.</p> <p>Clause 4.36 of the EP&A Act provides for a process where development can be declared SSD either by a SEPP or Ministerial order published in the Government Gazette. Clause 4.38 of the EP&A Act provides that the Minister is the consent authority for SSD. Part 4, Division 4.7 of the EP&A Act sets out the provisions which apply to the assessment and determination of development applications for SSD. The proposal is subject to clause 4.38 Consent for State Significant Development.</p> <p><i>State Environmental Planning Policy (Planning Systems) 2021</i> identifies development that is considered to have significance on a state-wide level.</p>

Statutory Relevance	Action
	<p>Clause 14 of Schedule 1 of the SEPP identifies hospitals, medical centres and health research facilities as state significant:</p> <p><i>14 Hospitals, medical centres and health research facilities</i></p> <p><i>Development that has a capital investment value of more than \$30 million for any of the following purposes—</i></p> <p><i>(a) Hospitals</i></p> <p><i>(b) Medical Centres</i></p> <p><i>(c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).</i></p> <p>The proposed development is to have a capital investment value of \$84,176,966 and is for the purpose of a hospital and medical centre. Therefore, the proposed development is considered to be state significant development.</p> <p>In accordance with Section 4.5 of the EP&A Act, the Independent Planning Commission is designated as the consent authority if there is a Council objection to the SSDA or there are more than 50 unique submissions.</p> <p>Unless otherwise declared, the Minister will be the consent authority for the SSDA (refer Clause 2.7 of <i>State Environmental Planning Policy (Planning Systems) 2021</i>).</p> <p>The Minister (or the Minister's delegate) will be required to take into consideration the matters listed under section 4.15 of the EP&A Act when determining the SSDA. These matters will be addressed in the EIS for the proposed development.</p>
Permissibility	<p>The site is zoned B7 (Business Park) in accordance with the SLEP 2012. 'Hospitals' and 'medical centres' are not expressly prohibited in the zone and are therefore permitted with development consent.</p>
Other approvals	<p>NSW Heritage Act 1977 (Heritage Act)</p> <p>The Heritage Act protects heritage items, sites and relics in NSW older than 50 years regardless of cultural heritage significance Section 4.41 of the EP&A Act, provides that SSD is exempt from the application of Division 8 of Part 6 of the Heritage Act.</p> <ul style="list-style-type: none"> ▪ The subject site is not identified as a heritage item on any statutory or non-statutory list or register. ▪ The site is not located within the vicinity of any heritage items. ▪ The site is not located within a Heritage Conservation Area (HCA). <p>Therefore, the NSW Heritage Act 1977 does not apply to the proposal.</p>

Statutory Relevance	Action
	<p>NSW Roads Act 1973 (Roads Act)</p> <p>Section 138 of the Roads Act requires the consent of the relevant roads authority City of Sydney or Transport for NSW (TfNSW) for work in, on, under or over a public road. Any works proposed to a public road as part of the proposal would require the consent of the relevant road authority. The project team has undertaken preliminary consultation with City of Sydney and TfNSW. It is anticipated that continued consultation with Council and TfNSW will occur during the assessment of the SSDA.</p>
	<p>NSW Protection of the Environment Operations Act 1997 (POEO Act)</p> <p>The POEO Act enforces licences and approvals formerly required under separate Acts relating to air, water and noise pollution, and waste management with a single integrated licence. Under Section 48 of the POEO Act, premise-based scheduled activities (as defined in Schedule 1 of the EP&A Act) require an Environment Protection Licence (EPL).</p> <p>Assessments carried as part of the EIS for the proposal would determine the need for an EPL. The general provisions of the POEO Act in relation to the control of pollution of the environment will apply throughout the development.</p> <p>During the construction phase of the project, appropriate management measures would be required in relation to the control of noise, dust, erosion and sedimentation, and stormwater discharge to ensure that the pollution control provisions of the POEO Act are satisfied.</p>

4.2. PRE-CONDITIONS

Table 9 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 9 Pre-Conditions

Statutory Reference	Pre-condition	Relevance	Section in EIS
<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>	A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is proposed to be carried out.	Subject to the completion of the remedial works and a site validation assessment, the site can be made suitable for development.	Section 6.1.8

4.3. MANDATORY CONSIDERATIONS

Table 10 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS

Table 10 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	Appendix C
Section 4.15	Relevant environmental planning instruments: <ul style="list-style-type: none"> ▪ <i>State Environmental Planning Policy (Planning Systems) 2021</i> ▪ <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> 	Appendix C
	▪ Sydney LEP 2012	Appendix C
	Relevant draft environmental planning instruments <ul style="list-style-type: none"> ▪ Southern Enterprise Area LEP Amendment 	Appendix C
	Relevant planning agreement or draft planning agreement <ul style="list-style-type: none"> ▪ Voluntary Planning Agreement for the site entered into between the applicant and another party 	Section 6.2.13 and Appendix I
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 6
	The suitability of the site for the development	Section 7.6
	The public interest	Section 7.7
Mandatory relevant considerations under EPIs		
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	<p>As the development will involve a change of use within an investigation area a report specifying the findings of a preliminary investigation of the land concerned has been carried out in accordance with the contaminated land planning guidelines.</p> <p>The Detailed Site Investigation confirms that, subject to the completion of the remedial works and a site validation assessment, the site can be made suitable for development.</p>	Section 6.1.9 and Appendix O, Appendix P and Appendix Q

Statutory Reference	Mandatory Consideration	Section in EIS
Sydney LEP 2012	<ul style="list-style-type: none"> ▪ Objectives and land uses for B7 Business Park Zone: <ul style="list-style-type: none"> - To provide a range of office and light industrial uses: the proposal will provide approximately 11,442.2m² of floor space for medical centre, hospital and ancillary uses. - To encourage employment opportunities: the proposal will create 700 jobs in construction and 130 full time jobs in operation. - To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area: Allied health related jobs will be delivered across the balance of the site. The proposal will provide a large investment in infrastructure spending and developer contributions. - To ensure uses support the viability of nearby centres: The proposal will facilitate the orderly and economic development of site in accordance with the relevant planning controls. The proposal will improve the urban realm experience by providing landscaping features, larger setbacks, through site links and places to stay and sit. ▪ Part 4 – Principal development standards ▪ Part 5 – Miscellaneous provisions ▪ Part 6 - Local Provisions – height and floor space ▪ Part 7 – Additional local provisions. 	Appendix C
Considerations under other legislation		
<i>Biodiversity Conservation Act 2016</i> (BC Act) – section 7.14	<p>Section 7.9 of the Biodiversity Conservation Act 2016 requires preparation of a Biodiversity Development Assessment Report for SSD that are assessed under Part 4 of the EP&A Act. This Concept SSDA will be assessed under Part 4 of the EP&A Act, and, therefore, would normally be required to include a BDAR.</p> <p>However, section 7.9(2) of the BC Act 2016 allows for exemption from the requirement where the development is not likely to have any significant impact on biodiversity values. A request for a waiver for submission of a BDAR was submitted to the DPE and the Office of Environment and Heritage.</p> <p>Subsequently, a waiver under section 7.9(2) of the BC Act 2016 was issued on 26 April 2022 and is provided at Appendix R. Accordingly, a BDAR is not required to be submitted with this EIS.</p>	Section 6.2.2 Appendix R

Statutory Reference	Mandatory Consideration	Section in EIS
Development Control Plans		
Sydney DCP 2012	<p>Clause 210 of the Planning Systems SEPP 2021 states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD.</p> <p>As such, there is no requirement for assessment of the proposal against the Sydney DCP 2012 for this SSDA. Notwithstanding this, consideration has been given to the following provisions:</p> <ul style="list-style-type: none"> ▪ Section 1: Introduction ▪ Section 3: General provisions ▪ Section 4: Development types ▪ Section 5: Specific areas. <p>Consideration has also been given to the draft Southern Enterprise Area DCP Amendment, to ensure compliance with the future controls that will apply to the site.</p> <p>The proposal has a high level of compliance with the Sydney DCP 2012 and the draft Southern Enterprise Area DCP amendment, as outlined in detail in Appendix C.</p>	Appendix C

5. COMMUNITY AND STAKEHOLDER ENGAGEMENT

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

5.1. ENGAGEMENT CARRIED OUT

Urbis have prepared an Engagement and Communications Outcome Report (**Appendix J**). Community and stakeholder engagement has been undertaken by the Project Team in the preparation of the SSDA. This included direct engagement and consultation with:

- The City of Sydney Council
- The Department of Planning and Environment
- Government Architect of NSW
- Registered Aboriginal Parties (RAPs)
- Transport for NSW
- Relevant public utility providers
- Surrounding property owners/ businesses

The Applicant engaged with all surrounding local landowners, businesses and stakeholders via a community letterbox drop.

This engagement was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements in the SEAR as summarised below:

- Direct consultation with agencies was undertaken in the preparation of detailed specialist studies and the EIS.
- An Engagement and Communication Outcomes Report has been prepared and accompanies the EIS.
- The EIS and supporting documentation will be placed on public exhibition once DPE 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 project, including the final development plans and the detailed specialist studies and assessment reports accompanying the final EIS.

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPE has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the applicant will respond to any matters raised by notified parties.

5.2. GOVERNMENT AGENCIES AND OTHER STAKEHOLDERS

The applicant and their consultants have engaged in one-on-one briefings with the relevant Government agencies throughout the design process as outlined in the table below.

Table 11 Stakeholder Engagement: Issues and Responses

Feedback	Response
<u>City of Sydney</u>	
Briefing meeting – 7th December 2022	
This meeting with the City of Sydney was an opportunity for the Applicant to brief Council officers (including planning, urban design and engineers) on the project and to proactively seek any views on the	

Feedback	Response
<p>scheme. Council's feedback was largely supportive of the proposed use, and their feedback on the early plans provided have been taken into consideration as through the development of the concept scheme.</p> <p>Key matters discussed in the pre-lodgement meeting include:</p> <ul style="list-style-type: none"> ▪ A porte-cochere is not supported in the building's front setback to Bourke Road ▪ The provision of parking at grade and on the first and second floor is also considered excessive ▪ As the height of the building exceeds 25 metres, the SLEP 2012 requires both a Concept DA and competitive design process prior to determination of a detailed design DA. ▪ Council acknowledge that the level of detail was very preliminary and their urban design team wanted to see more analysis of the surrounding context, and a more detailed progression of the Concept at upcoming meetings. <p>As demonstrated in the design report at Appendix H this feedback has been incorporated into the design of the concept envelope and reference scheme, with the porte-cochere removed from the Bourke Road frontage, along with removal of parking at the second floor level.</p>	
<p><u>Department of Planning and Environment</u></p> <p><u>Scoping meeting – 18th January 2022</u></p> <p>Department of Planning and Environment (DPE) Megan Fu and Nathan Stringer</p> <p>A virtual scoping meeting was held with planning officers at DPE on 18 January 2022 to get an early indication on the key matters requiring further assessment in the EIS and to confirm the approval pathway and assessment timeframes. DPE noted the following in relation the approval pathway:</p> <ul style="list-style-type: none"> ▪ A CIV report is required to accompany the scoping report to confirm that the proposal meets the SSDA trigger in State Environmental Planning Policy (Planning Systems 2021). This has been provided at Appendix F. ▪ A Clause 4.6 request to vary the height of building control would be required should the EIS be lodged prior the finalisation of the Southern Enterprise Area Review amendments to the SLEP 2012. This has been provided at Appendix N. 	
<p><u>Department of Planning and Environment and Planning Delivery Unit</u></p> <p>Briefing meeting with officers on 23 March 2022</p> <ul style="list-style-type: none"> ▪ Planning Delivery Unit (PDU) - David Petrie, Elise Crameri, Elloise Ames ▪ Department of Planning and Environment (DPE) – Karen Harragon, David Gibson, Megan Fu 	
<p>Consultation and engagement with GANSW is recommended.</p>	<p>Preliminary discussions have occurred with Rory Toomey from GANSW. As requested, a copy of the Design Excellence Strategy has been issued to GANSW for discussion and comment. It is anticipated that further discussions with the GANSW and the City's Design Excellence team during the assessment phase of the concept SSDA in preparing a design competition brief for the</p>

Feedback	Response
	design alternatives process to occur following determination of the concept SSDA.
DPE (KH) Confirmed early works as part of the Concept Plan SSDA is acceptable and is common practice.	Early works are no longer included in the scope of this SSDA.
A meeting with Council's VPA officers is recommended.	A meeting with City of Sydney's VPA officer was held on 8 June 2022. The outcomes of this briefing session are provided in the table below.
The project team was encouraged to lodge an application to the Priority Assessment Program.	<p>An application to the Priority Assessment Program was lodged 29th April 2022. On 12 May 2022, the project team were informed that the proposal does not satisfy enough of the program criteria to be eligible for the program.</p> <p>An email was received on 12 May 2022 stating that the Alexandria Health Centre project did not satisfy key criteria relating to Economic and Public benefit.</p> <p>Further information was requested from David Petrie on 26 May 2022 and 1 June 2022. The project team has not received a reply.</p>

Government Architect NSW

Preliminary discussions have occurred with Rory Toomey from GANSW. As requested, a copy of the Design Excellence Strategy has been issued to GANSW for discussion and comment. It is anticipated that further discussions with the GANSW and the City's Design Excellence team during the assessment phase of the concept SSDA in preparing a design competition brief for the design alternatives process to occur following determination of the concept SSDA.

The Design Excellence Strategy was sent to GANSW (**Appendix L**) for review and comment on 10 June 2022.

Transport for NSW

It is noted that Bourke Road is a local road and not a classified road, therefore the relevant roads authority is City of Sydney Council. The City of Sydney Council traffic engineer attended the pre-DA discussions with the project team on 5 April 2022, 30 May 2022 and 8 June 2022.

The project traffic consultant has contacted Transport for NSW, requesting a meeting to discuss the project and providing them a copy of the Transport Impact Assessment for comment. It is anticipated that further discussions will occur during the assessment phase.

City of Sydney Council

Briefing meeting with Council officers on 5 April 2022

- Andrew Rees – Area Planning Manager (Major Projects)
- Samantha Kruize - Senior Planner

Feedback	Response
<ul style="list-style-type: none"> ▪ Greg Longmuir - Planning Agreement Team ▪ Brett Caleur - Planning Agreement Team ▪ Asif Ahmed - Traffic Engineer ▪ Raj Narayan - Stormwater Engineer ▪ Jan McCredie - Urban Designer ▪ Gibran Khouri - Strategic Planner ▪ Susan Miles - Senior Public Domain Coordinator ▪ Jane Grant - Area Manager - Public Domain <p>The key issues raised by City of Sydney and the Project team responses are provided below.</p>	
<p>Council confirmed that separate meetings should be held with Council's Design Excellence team and GANSW to progress a competition brief noting the target for a competition to be held in Q4 2022.</p>	<p>It is anticipated that further discussions with the GANSW and the City's Design Excellence team during the assessment phase of the concept SSDA in preparing a design competition brief for the design alternatives process to occur following determination of the concept SSDA.</p>
<p>Council expressed their preference to limit the requirement for multiple Clause 4.6 Requests</p> <p>Council understood the timing of the draft LEP and the design of the concept envelope.</p>	<p>It is noted that the LEP amendment has been through public exhibition, has been endorsed by Council and gazettal is imminent with the LEP currently with DPE and Parliamentary Counsel. The proposal is directly aligned with the Amendment.</p> <p>A Clause 4.6 Variation Request has been prepared (Appendix N) to support the technical non-compliant building height at the time of submission. However it is noted, given the certain and imminent gazettal of the LEP amendment, it is likely the Clause 4.6 will be made redundant during the assessment of the proposal.</p>
<p>Council confirmed they do not object to early works being part of the stage 1 early works SSDA.</p>	<p>It is noted that early works are no longer included in the scope of this SSDA and approval is being sought only for the concept envelope to enable future redevelopment of the site.</p>
<p>Council confirmed that a letter of offer should be submitted with the SSD package and the VPA would be conditioned by way of the stage 1 consent.</p> <p>Council confirmed the VPA would be between Council and the applicant and would not involve DPE as the works would deliver public benefit to the City.</p>	<p>A letter of offer is provided at Appendix I. Refer to Section 6.2.11 for further discussion.</p> <p>It is noted that the VPA will not exclude the application of s7.11 and s7.12 of the EP&A Act to the development.</p>

Feedback	Response
<p>Council confirmed the 4 storey street wall is a central element of Council's controls and needs to be accommodated.</p> <p>Council noted that the approach to the Bourke Road frontage should consider the proportion of the street wall relative to the total building height.</p>	<p>In accordance with the Draft Sydney Development Control Plan 2012: Southern Enterprise Area Amendment, the proposal presents a four storey street wall to Bourke Road, with a 12m upper level setback, sympathetic to the surrounding streetscape.</p>
<p>Council would require a traffic impact study to justify the level of parking proposed.</p>	<p>A Traffic and Accessibility Impact Assessment has been prepared by Transport and Traffic Planning Associates and provided at Appendix M. Refer to Section 6.1.4 for further discussion on the traffic impact study and proposed parking.</p>
<p>Council noted that the flooding model should include the scenario where the laneways are provided given this would open up areas for overland flows.</p> <p>Council also suggested the Applicant considers the PMF levels and provide further justification on this.</p>	<p>Enstruct have prepared a Civil Engineering Report (Appendix T) that assesses the flooding risk of the proposal.</p> <p>As discussed in Section 6.1.8 and Appendix T, all entrance levels to the basement including the vehicle ramp, stairwells, ventilation and lifts will be designed to be protected from flooding during a PMF event. By ensuring all the entries to the basement are at the PMF level, Enstruct conclude the floor level of the basement is acceptable.</p>
<p>Council sought clarity on western boundary lane way setback.</p> <p>Council sought clarity on the vehicle route in the scenario where the laneways on the adjoining sites had been dedicated and the laneways are fully developed.</p>	<p>As shown in detail within the Urban Design report at Appendix H, A 3m setback is to be provided to the western boundary lane for levels ground to 3. A 6m setback is provided for levels 4-7.</p>
<p><u>Meeting to discuss laneway design on 30 May 2022</u></p> <ul style="list-style-type: none"> ▪ Andrew Rees – Area Planning Manager (Major Projects) ▪ Samantha Kruize - Senior Planner ▪ Greg Longmuir - Planning Agreement Team ▪ Gibran Khouri - Strategic Planner ▪ Susan Miles - Senior Public Domain Coordinator ▪ Jane Grant - Area Manager - Public Domain ▪ An email was sent to Gibran Khouri on 1 June 2022 to outline the different laneway options and to seek Council's feedback on the preferred option. The Applicant's explanation and notes are provided below. 	
<p>The draft DCP future laneway envisages a wider block than just the subject site, with 2-way traffic</p>	<p>Council officers noted that the laneway design in the draft DCP was indicative and further detailed</p>

Feedback	Response
<p>shown along the Bourke Rd/O’Riordan St north south leg, but one way traffic east and northbound for the remainder of the laneway system.</p> <p>Given the subject site will be developed in advance of the neighbouring sites to its west, south and east, and given the full laneway will require land dedication from the neighbouring sites to complete, the subject site will not be able to rely on access via the DCP future laneway in the short to medium term (i.e. Stage 1).</p> <p>At the meeting, the Applicant’s preferred option for future access once the full laneway is constructed (i.e. Stage 2) was discussed – i.e. maintaining the vehicle ingress to the site at Bourke Rd as a private driveway. The advantages of this option were discussed, including:</p> <ul style="list-style-type: none"> the address of the health centre is maintained wayfinding is clear and legible as the private driveway into the health centre is maintained the DCP laneway intent is not compromised. 	<p>investigation of the proposed future laneway design would need to be undertaken.</p> <p>It is noted the future laneway design will not impact on the Concept SSDA the subject of this application as the proposed vehicle arrangement provides two-way access off Bourke Road by providing a 6 m accessway (3m of which would be dedicated to Council in the future as part of a VPA).</p> <p>It is anticipated that further discussions will occur between the applicant and Council in the coming months in relation to the VPA letter of offer, which will detail future arrangements for laneway design and dedication.</p> <p>Preliminary feedback has been received from Council on 15 June 2022 confirming acceptability of the ‘Stage 1’ traffic solution and discussing alternative solutions for future traffic access once the laneway is fully developed. It is anticipated that further discussions will occur with Council prior to and during the exhibition of the SSDA to inform the project response to the matters raised.</p>
<p><u>Meeting with VPA Officer – 8 June 2022</u></p> <ul style="list-style-type: none"> Andrew Rees – Area Planning Manager (major projects) Samantha Kruize - Senior Planner Greg Longmuir - Planning Agreement Team <p>A further discussion occurred between Council’s VPA officer and the applicant’s project team to discuss the public benefit offer. Council expressed in-principle support for the draft VPA offer to be based on the dedication of land at the Bourke Rd frontage for a pedestrian footpath (2.4 m) as well as laneways along the western and southern boundaries of the site (3 m each).</p> <p>Further discussions are anticipated between Council and the applicant’s project team in relation to the VPA based on the draft VPA letter of offer submitted along with this Concept SSDA (see Appendix I).</p>	

5.3. COMMUNITY VIEWS

At the time of writing this report, no response has been received from the public. The Applicant will continue to reach out to surrounding local landowners, businesses and stakeholders as plans progress.

5.4. ENGAGEMENT TO BE CARRIED OUT

Alexandria Property Development welcomes feedback on the proposal and will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- Continuing to engage with the community about the project and its impacts, as the project moves through subsequent stages of the approval process

- Enabling the community to seek clarification about the project through the two-way communication channels.

Further community and stakeholder consultation will be undertaken if the project is approved. The proposed consultation responds to the community feedback during the preparation of the EIS and the community participation objectives in the Undertaking Engagement guide.

6. ASSESSMENT OF IMPACTS

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts. Further detailed information is appended to the EIS, including:

- SEARs compliance table identifying where the SEARs have been addressed in the EIS (**Appendix A**).
- Statutory compliance table identifying where the relevant statutory requirements have been addressed (**Appendix C**).
- Community engagement table identifying where the issues raised by the community during engagement have been addressed (**Appendix D**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix E**).

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

6.1. DETAILED ASSESSMENT IMPACTS

This section of the report provides a detailed assessment of the key issues which could have a significant impact on the site and locality. It provides a comprehensive assessment of the relevant issues and the mitigation measures required to avoid, mitigate and/or offset the impacts of the project.

6.1.1. Design Quality

As the height of the concept envelope exceeds 25m, the Sydney LEP 2012 requires both a Concept DA and competitive design process prior to determination of a detailed design DA. A competitive design process will be unique for this type of project and will align with the City of Sydney and Government Architect of NSW design excellence framework.

A Design Excellence Strategy has been prepared by Urbis (**Appendix L**) and has been submitted to the Government Architect NSW (**GANSW**) in support of the Competitive Design Process for 'Alexandria Health Centre' 28-32 Bourke Road, Alexandria (the **site**) for redevelopment for medical centre and mental health hospital uses. The parameters of the built form will be informed by the concept envelope addressed as part of the Concept state significant development application (SSD-38600121).

In accordance with Clause 1.2 of the City of Sydney Competitive Design Policy (adopted by Council on 9 December 2013) and section 3.3.2 of the SDGP 2012, the Design Excellence Strategy defines:

- The location and extent of each competitive design process;*
- The type of competitive design process to be undertaken:*
 - an architectural design competition, open or invited; or*
 - the preparation of design alternatives on a competitive basis.*
- The number of designers involved in the process;*
- How architectural design variety is to be achieved across large sites;*
- Whether the competitive design process is pursuing additional floor space or height;*
- Options for distributing any additional floor space area or building height which may be granted by the consent authority for demonstrating design excellence through a competitive design process;*
- The target benchmarks for ecologically sustainable development.*

The preparation of this Strategy has also been guided by the Government Architect's Design Excellence Competition Guidelines (Draft), as exhibited in May 2018. The redevelopment of the site will be guided by the aims and objectives of the Sydney Local Environmental Plan (LEP) 2012 and Sydney Development

Control Plan (DCP) 2012, as well as the draft LEP and DCP amendments currently being progressed by Council as part of the Southern Enterprise Area Review.

6.1.2. Built Form, Urban Design and Visual Impacts

The Design Report prepared by NBRS (**Appendix H**) provides a comprehensive assessment of the urban context, including the way in which the proposed built form, height, bulk and scale, setbacks and interface responds to the existing, approved and likely future development within the surrounding locality and the public domain.

Concept Envelope

The concept envelope has been shaped by Council's current and existing controls. The Applicant has engaged NBRS, an architecture firm that specialises in the design of health facilities including hospitals as the lead architect for the project at this Concept DA stage. The reference scheme has been designed to assist with the development of a Concept DA envelope, drawing together a number of the specific health and servicing related needs of the project, and balancing this against the key planning controls applicable to the site.

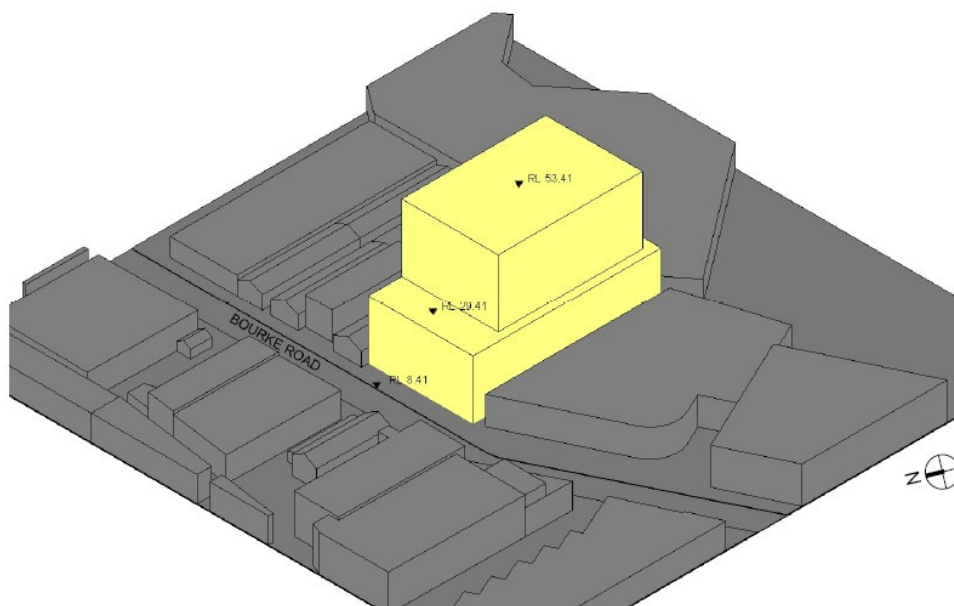
The Concept DA envelope will provide a framework for a future competitive design process, which will be complemented by detailed health planning advice for competitors, aligned with the needs of the future operator.

The building envelope will have a maximum height of 45 m, which will comply with the height of building control in the draft Enterprise Area Review LEP amendment. The building envelope has been carefully designed to comply with the setback requirements set out in the draft Sydney DCP 2012: Southern Enterprise Area Amendment, including:

- 12m from the street wall along Bourke Road
- 3m from the podium on the west
- 3.5m from the podium on the south
- No setback proposed to the eastern boundary.

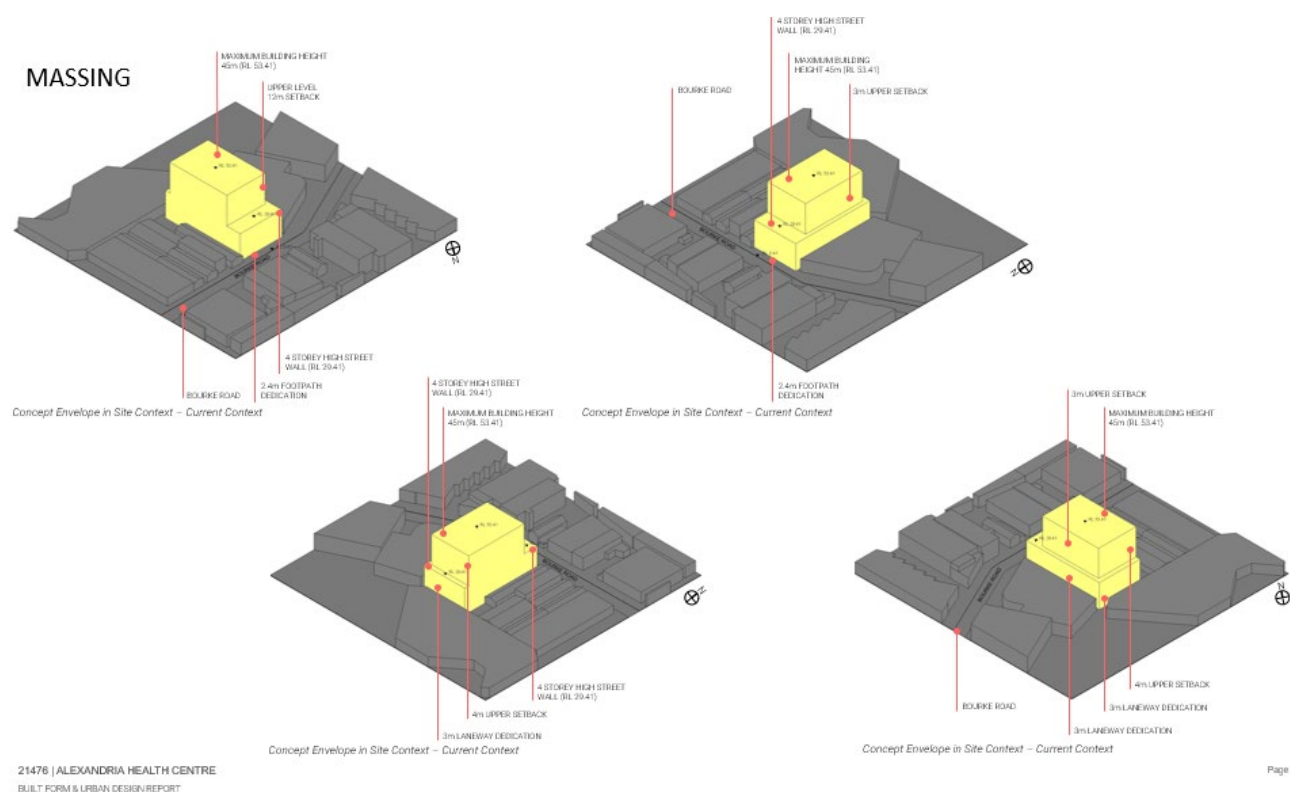
The proposed concept envelope consists of a 4 storey podium and a tower form above the podium, extending up to RL53.41 or 45m above street level. The podium is setback 2.4m from the northern boundary to allow for the footpath dedication, 3m from the western boundary, and 3.5m on the southern boundary. No setback proposed on the eastern boundary.

Figure 11 Concept Envelope



Source: NBRS

Figure 12 Massing Diagram



Source: NBRS

Visual Impacts

NBRS have prepared a Visual Impact Assessment (VIA) (within the Design Report at **Appendix H**) to assess the potential visual impacts of the proposed development.

The site is located in an urban renewal area that will transition from a light industrial use to a higher density commercial and knowledge-based businesses. Therefore, the VIA details the view impacts of the proposal considering the current site conditions and the proposed site situation. The two views that been examined are Bourke Road looking west and east.

Current Scenario

As outlined in **Figure 13** below, the visual impact of the proposal in the current context will be significant. The concept envelope is significantly taller than the existing buildings surrounding the site. It is noted that there will be minimal privacy impacts of the proposal, as the neighbouring buildings are warehouse buildings.

There will be minimal visual impact on the privacy of neighbouring properties as most of these will be large light industrial warehouses. The Green Square Town Centre will have a view of the development and the east elevation of the development will have views towards Green Square, but at over 300m away, overlooking is negligible.

Figure 13 The Proposal in the existing context



Source: NBRS

Future Scenario

As outlined in Figure 14, once the surrounding sites have been development in accordance with the Southern Enterprise Review, the concept envelope will integrate into the scale of the streetscape. The concept envelope is fully compliant with Council's emerging built form controls.

The tower setback is replicated further along the street toward the east as the urban density increases in this direction. To the West, the building heights step down away from Green Square.

Once the surrounding neighbourhood to the development has been developed, the building integrates seamlessly as the scale and streetscape read similarly. The area will be as per the City of Sydney's vision where Alexandria has evolved and revitalised into a thriving employment neighbourhood incorporating a broad range of uses, including higher density commercial, specialised clusters of creative and knowledge-based businesses, entertainment and business support services.

Figure 14 The Proposal in the future context



Source: NBRS

Crime Prevention Through Environmental Design

A Crime Prevention Through Environmental Design (CPTED) Report has been prepared by NEAL Consulting Solutions (**Appendix U**). The CPTED Assessment makes recommendations relating to crime prevention elements and treatments to be incorporated in the development design to minimise risk or opportunities for crimes to occur.

The methodology included a policy review, desktop site analysis to determine crime profile and assessment and recommendations. NEAL Consulting Solutions provides the following mitigation measures to be incorporated in future detailed design of the proposal:

- Access to the building: provide adequate lighting; install CCTV and ensure the landscaping maintains clear sightlines and does not allow opportunities for concealment. Restrict access to the car park.
- Landscaping: landscaping should be maintained to have low shrubs and reduce density.
- Surveillance: maximise natural surveillance through the provisions of windows and doors.
- Lighting: provide lighting at entry/exit points, service areas and loading areas.
- CCTV: CCTV should be installed at all entry/exit points and external areas of the building.
- Materials: Materials and fixtures utilised should not create opportunities for vandalism.

NEAL Consulting Solutions conclude that the site can be made suitable for the proposed development subject to the adoption and implementation of the above mitigation measures.

Public Art Strategy

A Public Art Strategy has been prepared by UAP, and is attached to the Urban Design Report at **Appendix H**. Public art for 28—32 Bourke Road will be developed to align with the City of Sydney's vision and goals for public art, and will draw from the City's Sustainable Sydney 2030 vision and related public art policies, strategies and plans.

The following objectives will help to thematically guide the conceptual development of public artwork at the site:

- Presence: Public art will have a presence at the frontage of Bourke Road and provide a welcoming focal point for people entering to the site.
- Discovery: Discovery seeks to encourage the integration of public art which offers people moments for discovery and the opportunity to experience something new.
- Connection: Connection acknowledges the importance of connection, between people and place in creating a sense of community and contributing to feelings of wellbeing.

The following artwork forms have the potential to be integrated within the Bourke Road frontage:

- Sculptural elements, singular, medium in size or; 2- 5 clustered elements, small in size
- Functional elements
- Ground plane treatment

The final public artwork composition will be determined by a future design competition and detailed SSD application.

6.1.3. Environmental Amenity

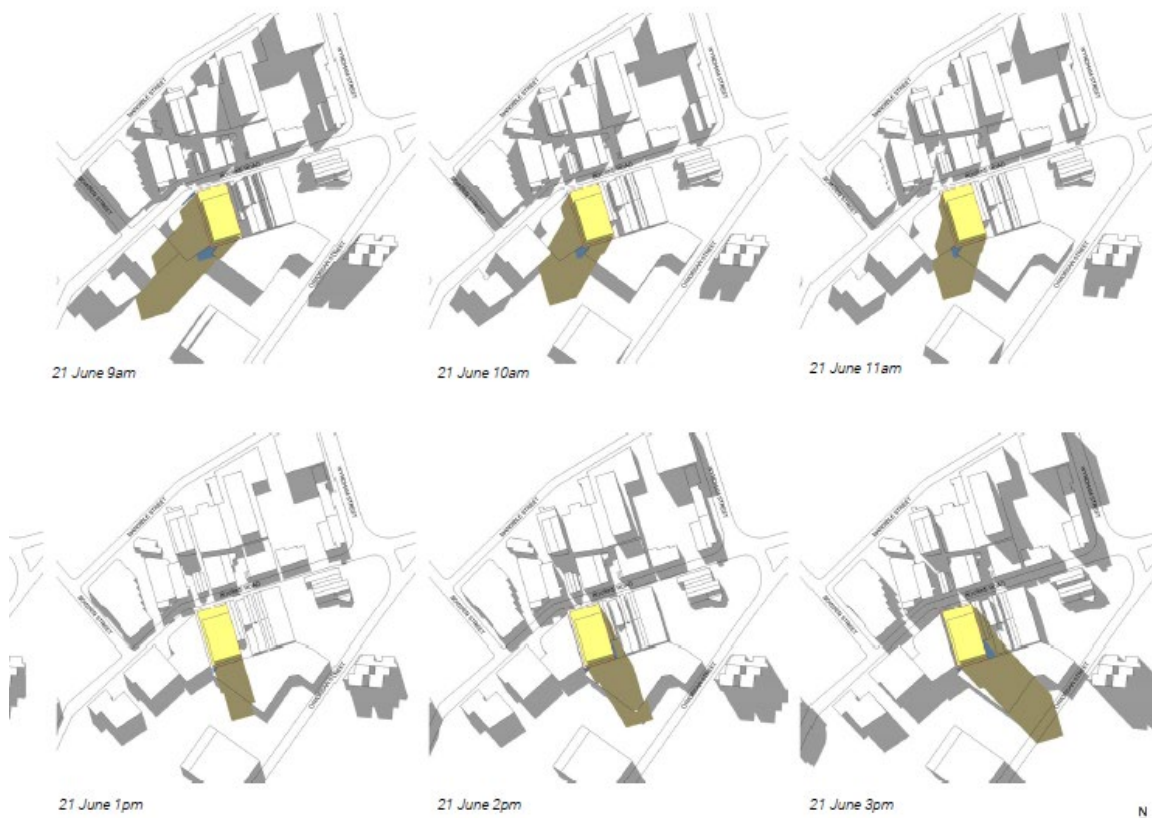
Overshadowing Impacts

Shadow diagram have been prepared which reflect the overshadowing impact of the proposed development at hourly intervals from 9am to 3pm during the winter solstice (21 June). The shadow diagrams have been shown in the existing scenario and future development scenario.

Current Scenario

The shadow studies demonstrate that shadows cast by the concept envelope (shown in yellow) are largely contained within its boundary as well as on its surrounding west, south and east neighbouring large expanse of warehouse roofing. As most of these are warehouses, there will no loss in amenity in the adjacent properties.

Figure 15 Current Scenario Overshadowing Plans

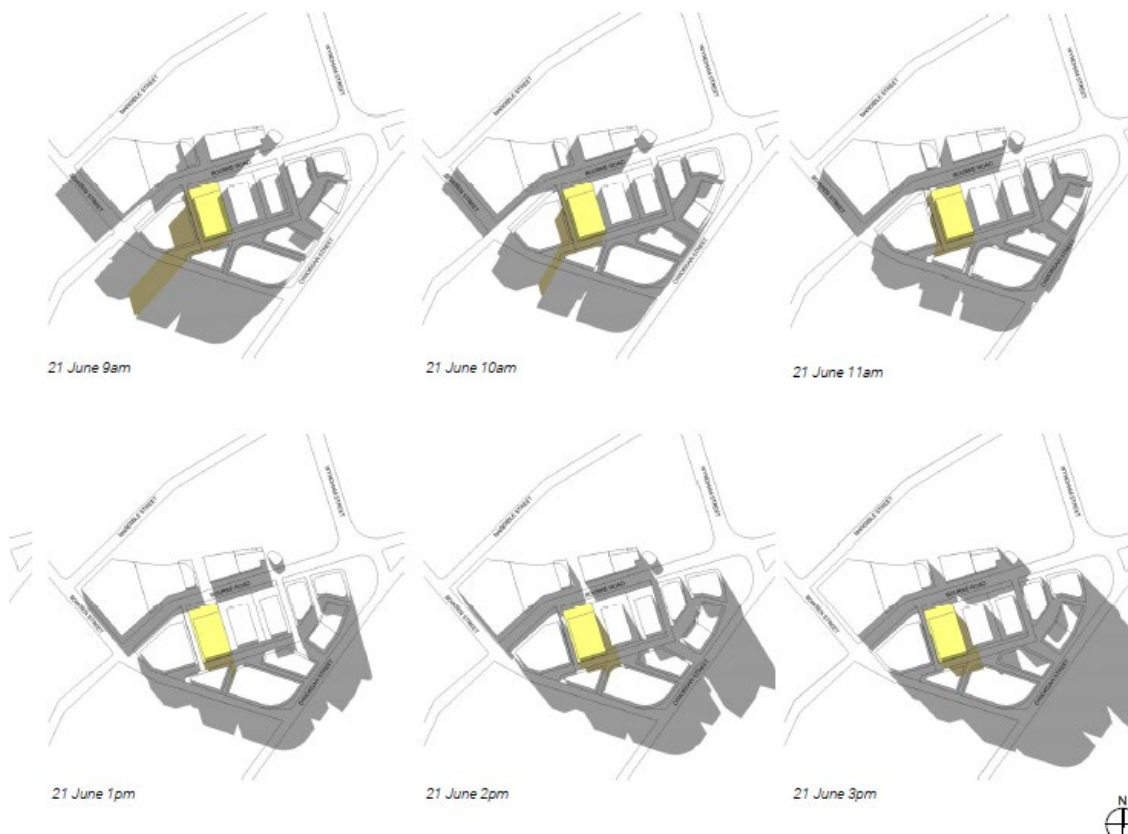


Source: NBRS

Future Scenario

The proposed development complies with the maximum building height controls and has been sited to provide for satisfactory separation distances between the neighbouring sites. The shadow diagrams show that the locality is affected by the existing and likely future developments in the precinct. The proposed built form has been designed to avoid unacceptable shadow impacts to surrounding properties and the public domain.

Figure 16 Future Scenario Overshadowing Plans

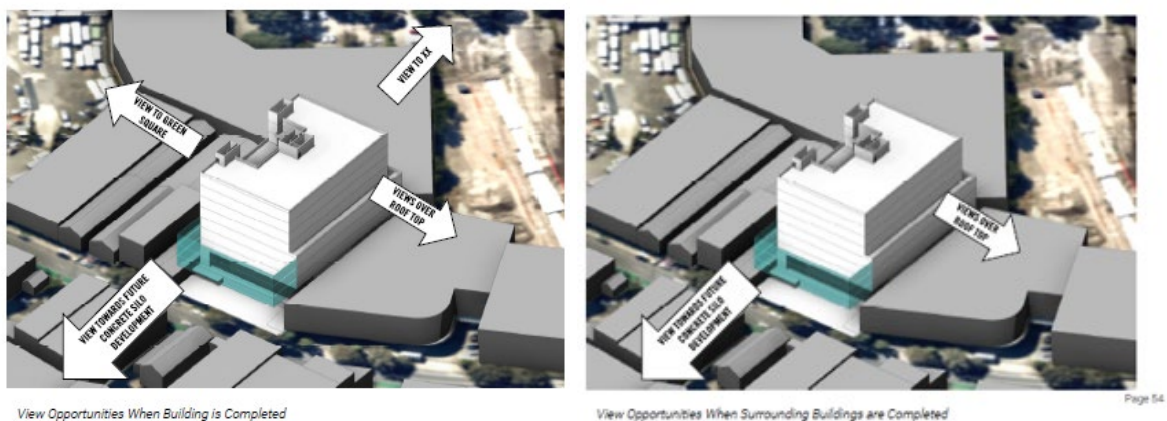


Source: NBRS

View Opportunities

NBRS have prepared a view opportunities study within the Design Report at **Appendix H**, as extracted at **Figure 17** below. The View opportunities study shows the site will benefit from views from all directions in the current scenario and views to the north and west in the future scenario.

Figure 17 View Analysis



Source: NBRS

6.1.4. Traffic, Transport and Accessibility

The Transport and Traffic Planning Associates (TTPA) have prepared a suite of reports (**Appendix M**) which address the transport, traffic, parking and access matters including:

- Transport and Accessibility Impact Assessment (**TAIA**) which assesses the impact of the proposed development on the surrounding transport network.
- Green Travel Plan (**GTP**) which outlines the way in which travel demand will be managed in the future site operations.
- Indicative Construction Traffic Management Plan (**CTMP**) which outlines the matters to be addressed within the CTMP to be prepared in accordance with the approved development.

Each of these reports is addressed within the following section of the EIS.

Existing Environment

The site is highly accessible to public transport services. Green Square Railway Station is approximately 300 metres walking distance from the site and provides rail service connections to destinations across Sydney. Bus stops on Botany provide connectivity to surrounding suburbs in the east, south and city.

TTPA have analysed traffic volume data published by TfNSW and surveys undertaken for the study. The TfNSW data is expressed in the form of Average Annual Daily Traffic (AADT) and relevant to the site are the following:

- Botany Road south of Raglan Street: 25,331 AADT
- Wyndham Street north of Bourke Road 11,823 AADT

The SIDRA results indicate that this intersection operates quite satisfactorily at the present time although traffic conditions in the area are influenced by the operation of other major intersections (e.g. Botany Road/Bourke Road, Botany Road/McEvoy Street).

Potential Impacts

The proposed development has been assessed based on its strategic transport context, agency consultation, an assessment of parking requirements based on the proposed land use and predicted modal share of transport movements. Consideration is given to the potential traffic generation of the proposal, the adequacy of the proposed loading and service vehicle provisions, CPTED principles, alternative forms of transport and preparation of a Green Travel Plan (GTP) to encourage sustainable transport modes.

The following sections analyse potential traffic, parking and access impacts of the proposed development.

Traffic

The traffic generation of the development will involve:

- 10 visitor / set-down/pick-up spaces
- 15 staff spaces
- 49 rooms for consultation (20 consultant spaces)
- On-street / on-site SD/PU activities (taxi, ride share, others)
- Service / delivery vehicles.

TTPA have estimated the following traffic flows during the morning and evening peaks.

Table 12 Traffic Generation

Use	AM		PM	
	In	Out	In	Out
Hospital visitors	4	4	10	10
Hospital staff	10	10	10	10

Use	AM		PM	
	In	Out	In	Out
Medical Centre rooms	10	-	-	10
Visitor set down/ pick up	4	4	4	4
Service/ delivery	2	2	-	-
Total	30	20	24	34

TTPA conclude that the projected traffic generation is relatively insignificant compared to other land uses, including retail or commercial uses. The anticipated car trips would be relatively evenly distributed to the north and south on Bourke Road. Further, travel via public or active transport will be highly encouraged for staff, through implementation of the Green Travel Plan.

Parking

The Sydney LEP 2012 does not contain a parking criteria for “hospital” use, the only criteria is for “health consulting rooms and medical centres” being 2 spaces per consulting room. TTPA conclude that a reasonable provision for the proposal, having regard for Council’s constrained parking policy, would be:

- 10 spaces for visitors or people transporting patients
- 15 spaces for staff
- 4 levels of Medical Centre rooms plus 2 GP clinics, say 40 rooms minimum ($6,938 \div 40 = 173\text{m}^2$) – 80 spaces
- Total: 105 spaces

It is proposed to provide 70-74 spaces which is 70% of the indicative constrained parking provision and it is apparent that the proposed car parking provision is compliant with Council’s constrained parking strategy to reduce reliance on travel by private motor vehicle.

Council’s DCP specifies the following rates for motorcycles and bicycle parking:

- Motorcycles - 1 space per 12 car spaces
- Bicycles - staff 1 space per 5 practitioners/professionals
- Medical Centre/Health Consulting Rooms - visitors 1 space per 200m² GFA

This will require the following bicycle and motorbike spaces at the proposed development:

- 6 motorcycle spaces
- 12 staff bicycle spaces
- 38 visitor bicycle spaces

The proposed motorcycles and bicycles will be compliant with Council’s DCP criteria.

Access and Servicing

The proposed vehicle access arrangements will be constructed to Council’s specifications while the design of the driveways will comply with the requirements of AS2890.1 & 2. The lane way will be relatively level at the driveway connections and there will be good sight distances available.

It is noted the proposal will consolidate two exiting driveways on the site into one driveway.

Mitigation Measures

An Indicative Construction Traffic Management Plan (**CTMP**) has been prepared by TTPA (**Appendix M**) which establishes the principles and objectives for construction traffic management and provides an indicative construction methodology to ensure the safety of the public and workers. The Indicative CTMP will be further developed and a detailed CTMP finalised prior to the commencement of construction activities.

A Green Travel Plan (**GTP**) has also been prepared by TTPA (**Appendix M**) which encourages use of transport modes that have low environmental impacts, including walking, cycling, public transport, and better management of car use. The GTP will be implemented during the operational phase of the development, and includes provisions such as:

- Public transport maps provided on noticeboards, newsletters, websites, social media to alert visitors and staff of the alternative transport options.
- Appoint a Travel Plan Coordinator (TPC) for the life of the development to ensure the successful implementation and monitoring of the GTP.
- The GTP will be monitored to ensure that it is achieving the desired benefits, including travel surveys to establish travel patterns and mode share of trips to and from the site. The GTP may be updated to influence further changes to the travel behaviour.

In summary, the traffic and parking implications are not expected to result in any discernible adverse impact on the surrounding road network, with management measures to ensure minimal traffic and parking implications for both construction and operation of the proposed hospital and medical centre uses on the site.

6.1.5. Noise and Vibration

An Acoustic and Vibration Assessment Report has been prepared by Acoustic Studio and is included at **Appendix S**. The report addresses the proposed operational and construction noise impacts associated with the concept proposal.

Existing Environment

A survey of the existing noise environment around the site was conducted with an unattended noise monitor used to continuously record the noise levels on the site. From observations during Acoustic Logic's site visits, it is noted that both ambient and background noise levels around the site are currently dominated by traffic noise from Bourke Road and industrial noise from existing land use adjacent to the site.

A survey of the existing vibration levels from the Airport and South Rail Line underground tunnels adjacent to the site was conducted via attended vibration level measurements on the site. The results show no significant variations in ground borne vibration levels from the northbound and southbound tracks.

Potential Impacts

A noise and vibration assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment has been separated into operational, transportation, rail, construction noise and vibration impacts and is summarised below.

Operational Noise and Vibration Assessment

As the proposal is for a concept application, detailed plant selections have not been made. Therefore, Acoustic Studio a preliminary review has been carried out for the plant rooms, based on the location and the most restrictive criteria, noise emissions from the plant rooms shall be limited to the following:

- LAeq 60 dB(A) at 1m from main intake or discharge louvres at each level of the building.
- LAeq 65 dB(A) at 1m from the rooftop plant room boundary/ perimeter.

The closest residential receivers are 200m to the south of the site at Reserve Street. These residences are affected by the existing industrial noise sources of the area and road traffic noise (primarily from O'Riordan Street).

The noise impact assessment is based on a worst-case assessment for noise emissions from the proposal. This worst-case assessment assumes that the plant and building operations potentially occur for 24 hours

per day, 7 days per week. Therefore, the assessment and associated noise controls are based on the night-time RBL derived from the long-term monitoring - ie they are derived from the existing nighttime Background Noise Level (the Rating Background Level, RBL).

Noise controls will be incorporated with the design of the plant rooms to ensure that the cumulative noise output from plant to the nearest affected receivers is within the allowable limits. General design considerations typically include: strategic selection and location of the and acoustic noise control measures such as enclosures, barriers and acoustic louvres.

The final facade composition will be determined by a future design competition and detailed SSD application. Therefore, a preliminary minimum Sound Reduction assessment has been undertaken. This assessment has assumed the traffic noise levels from Bourke Road and noise from surrounding industrial noise sources. In order to achieve the total internal noise levels proposed for each space the final facade for the northern and western elevations will need to be designed to provide a R'w 35 in-situ sound insulation performance.

Transportation Noise and Vibration Assessment

Based on information provided by the traffic consultant, the traffic noise impact resulting from the development is anticipated to be insignificant, as the traffic noise level increase will be 0 dB. Therefore, as a consequence of the modest changes in traffic flows and vehicle movements associated with the proposed development, the design criterion of an increase in traffic noise levels of no more than 2 dB will be met.

Rail Ground-Borne Noise and Vibration Assessment

Estimated ground-borne noise and vibration levels show the existing trains would result in vibration levels below the vibration criterion and below the noise criterion of 35 dB(A) for the overnight patient accommodation.

The preliminary assessment indicates that perceptible vibration will not be an issue for the development, and that ground-borne noise levels warrant no further review or investigation.

Construction Noise and Vibration Assessment

There is potential for construction noise and vibration impacts on the surrounding community. Based on the relevant guidelines, recommendations are provided for noise and vibration mitigation measures to be considered as part of the demolition and construction planning process. A Construction Management Plan is to accompany any future detailed SSD applications.

Mitigation Measures

Acoustic Studio have provided general recommendations for managing construction noise and vibration impacts to be considered in the development of a detailed Construction Management Plan. These include:

- Noise monitoring will need to be undertaken as required to monitor and help to minimise construction noise to avoid discomfort to occupants of the surrounding areas.
- The contractor shall carry out a preliminary vibration assessment at the commencement of operations for each vibration generating plant to determine whether the existence of significant vibration levels justifies a more detailed investigation.
- Provide information to neighbours before and during construction. Create a documented complaints process and keep register of any complaints.

Acoustic Studio conclude that provided the acoustic issues outlined in this report are addressed in the design and the recommendations are correctly implemented, the proposed development is expected to comply with the all relevant requirements and will not have an adverse noise impact to the nearest affected noise-sensitive receivers.

6.1.6. Ground and Water Conditions

EP Risk have prepared a suite of reports which address the ground and water conditions analysis of the site, include:

- Detailed Site Investigation – which includes a geotechnical investigation and acid sulfate soils assessment (**Appendix O**)
- Groundwater Impact Assessment Report (**Appendix V**)

- Salinity Management Plan (**Appendix EE**)
- Acid Sulfate Soils Report (**Appendix FF**).

A summary of the assessment and recommended mitigation measures are provided below.

Existing Environment

Fortify Geotech (on behalf of EP Risk) used field work and laboratory work to determine the geotechnical conditions at the site (**Appendix O**). The field work for the investigation included eight drilling boreholes at varying depths and installation three of groundwater monitoring wells and laboratory testing of selected samples.

The geological information provided by the Department of Regional NSW indicates the area to be underlain by Coastal deposited dune facies over Triassic Age Ashfield Shale. Ashfield Shale consists of black to light grey shale and laminite.

The average groundwater strike elevation across the Site is 6.65m AHD and regional groundwater is inferred to flow south-west towards Botany Bay. It is noted that the final design and basement configuration is subject to a design excellence competition and separate detailed State Significant Development application. Therefore, a high level ground water impact assessment has been prepared to examine potential future impacts to groundwater at the site.

Potential Impacts

A groundwater conceptual model was prepared for the site in order to inform potential dewatering calculations and subsequent impact assessment. The following conclusions have been made:

- Construction impact assessment:

Excavation for the building foundations (including boreholes for piling foundations) and the construction of the basement is likely to intercept groundwater. However, this is to be confirmed following the detailed design.

Installation of pile foundations (excluding pile walls) is expected to have negligible impact on groundwater flow paths due to their small size in comparison to the building footprint.

No predicted groundwater dewatering was required and therefore this meets the Level 1 minimal impact considerations specified in the NSW Aquifer Interference Policy and are considered acceptable.

The existing site is covered in hardstand and the proposal will reduce hardstand areas across the site. Accordingly, it is predicted the groundwater impacts from the proposal will be less than level 1 minimal impact considerations as specified in the NSW Aquifer Interference Policy.

- Operational impact assessment:

Groundwater level impact: The proposed basement will sit above the water table and therefore minimal impact to groundwater. Pile foundations will likely intercept groundwater however will have minimal impact on groundwater flow and quality surrounding the Site.

Water quality impacts: There is no proposed extraction of groundwater during operation. The rainfall will be directed to the stormwater network rather than infiltrating to the groundwater. EP Risk conclude there are no operational impacts to groundwater quality from the proposal.

A Salinity Management Plan has been prepared by EP Risk (**Appendix EE**). EP Risk conclude the site is not mapped within a salinity area and the salinity of the underlying aquifer ranges between 369 mg/L and 613 mg/L indicating the aquifer is relatively fresh and low salinity. Overall, based on the data obtained from the desktop review and the site inspection undertaken by EP Risk, the likelihood of salinity is considered to be very low.

Mitigation Measures

A summary of the key impacts and proposed mitigation and monitoring measures are outlined in the table below.

Table 13 Potential Groundwater Impacts and Mitigation Measures

Activity	Potential Impacts	Risk Rating	Mitigation Measures	Residual Risk Rating
Construction – Chemical or hydrocarbon spill during construction	Contamination of groundwater	Moderate	Storage of hazardous materials and refuelling to be undertaken in bunded areas. Spill kits to be kept onsite and staff informed of how to use them in an incident.	Low
Operation of the medical centre.	Contamination of the aquifer due to the proposed development.	Low	Proper stormwater drainage installed and maintained to prevent groundwater infiltration onsite.	Low

EP Risk provide the following recommendations to be implemented during future detailed SSDAs at the site:

- During the proposed development/ excavation works should saline soils be suspected or identified works should cease and qualified Environmental Consultant be contacted. Furthermore, the general Saline Soils Management Options and Strategies outlined in report should be followed.

The reports conclude the site is suitable for the development, subject to the implementation of the listed mitigation measures.

6.1.7. Stormwater and Wastewater

Enstruct have prepared a Civil Engineering Report (**Appendix T**) which sets out the stormwater management works. A summary of the assessment and recommended mitigation measures is provided below.

Existing Environment

A site investigation revealed a number of outlets along the kerb of Bourke Road to the stormwater pits along the road. Dial Before You Dig data shows the nearest stormwater pits are east of the site on Bourke Road. The existing stormwater from the site currently discharges to Bourke Road kerb and flows east along Bourke Road into the storm water pits on the kerbside outside of 24 Bourke Road.

Potential Impacts

Enstruct contacted Sydney Water in March 2022 to determine on-site detention (OSD) requirements for the site. Sydney Water confirmed that OSD is required on the site with a storage capacity of at least 46 cubic metres with permissible discharge of 110 L/s. The civil design includes a 50m³ OSD tank to allow for freeboard and stormwater quality filters within the tank.

The Civil Report assesses the proposed Water Sensitive Urban Design (**WSUD**) features in accordance with the MUSIC software. Both the stormwater quantity and stormwater quality treatment measures are identified within the report and as summarised below.

The proposed development includes roof water capture and re-use. A rainwater tank will supply the air conditioning cooling towers and landscape irrigation uses. In addition, the OSD tanks will be fitted with 8 filter cartridges devices which are actively used to reduce the levels of pollutants within the rainwater tank overflow prior to discharge to from the site. The capture and re-use of rainwater will reduce volume of stormwater and associated pollutants that are discharged from the site.

Under the City of Sydney DCP 2012 section 3.7.3 (1), a site with an area greater than 1,000m² is to be designed to reduce annual pollutant from litter and vegetation, total suspended solids and finally reduction of

total phosphorus and nitrogen pollutant levels. A MUSIC model has been prepared in order to demonstrate a satisfactory design for stormwater quality.

Table 14 below outlines the MUSIC results and demonstrates compliance with the City of Sydney DCP pollution reduction targets.

Table 14 Pollutant Reduction Targets

Pollutant	DCP Target Requirement	MUSIC Model Results
Gross Pollutants (GP)	90%	~99%
Total Suspended Solids (TSS)	85%	86%
Total Phosphorous (TP)	65%	81.5%
Total Nitrogen (TN)	45%	71.1%

Table 14 demonstrates the DCP targets have been met and exceeding the required level of reduction for each pollutant type. Stormwater discharge will be via a new connection to the stormwater pit outside of 24 Bourke Road.

Mitigation Measures

The erosion and sediment control measures adopted for the development during the construction phase will be designed in accordance with Council guidelines and Soils and Construction – Managing Urban Stormwater – Landcom. Stormwater quality improvement will be achieved through rainwater capture and re-use, and stormwater filter cartridges in the OSD tank.

6.1.8. Contamination and Remediation

A Detailed Site Investigation (DSI) Report has been prepared by EP Risk Management (**Appendix O**). The DSI Report assesses the current contamination status of the site and determines the potential risk of contaminants of potential concern (CoPC).

A Framework Remediation Action Plan (**Appendix P**) and Interim Audit Advice (**Appendix Q**) have been prepared to support the SSDA.

Existing Environment

Based on the previous Soil Contamination Assessment (SCA) and site history review, the site had previously been occupied by various commercial and industrial proprietors including chemical and metal product manufacturers, zinc and lead merchants, sprayers, adhesives manufacturers and a car tyre fitter's workshop.

The site is situated in an area with a long history of industrial development and is surrounded by commercial/industrial properties.

Potential Impacts

- Concentrations of lead in soil are shown to be the most significant CoPC analysed within the site. The concentrations of lead in eight (8) of the 43 samples analysed exceeds the National Environment Protection Measures 2013 (ASC NEPM 2013) Health Investigation Levels Health Investigation Level (HIL) D criteria for Commercial/Industrial land use.
- Concentrations of Benzo(a)Pyrene (B(a)P) Toxic Equivalence Quotient (TEQ) were detected at low levels – below the ASC NEPM 2013 HIL D criteria for Commercial/Industrial uses.
- Asbestos in soils concentrations were reported below the laboratory Limit of Reporting (LOR) in all soil samples analysed and asbestos containing material (ACM) were not visually identified in soil during the intrusive investigation. However, ACM was visually observed within the site during the initial SCA and is therefore known to be present within the site.

- The groundwater monitoring reported detectable levels of arsenic, chromium and lead, however these did not exceed the adopted criteria.
- Concentrations of zinc and nickel were detected in excess of the relevant criteria.
- Groundwater is likely to be an exposure pathway to future construction and/or remediation workers on the Site due to the relatively shallow groundwater.
- On-site soil contaminant concentrations are a significant health risk to Site personnel during planned remediation and construction works, in particular the works involving the excavation of soil in areas containing significantly high concentrations of Lead.
- The contaminants are likely to be able to move off-site through leaching into groundwater. Though the concentrations of Lead in groundwater are relatively low, there exists a data gap in the south-eastern section of the Site where the high lead concentrations were detected, and no groundwater data has been obtained.
- As outlined in the Acid Sulfate Soils Report (**Appendix FF**), there exists the possibility of the presence of actual or potential acid sulfate soils within the Site, however no ASS was detected within the results of the DSI. The results indicate an acid sulfate soils management plan is likely not required for the Site due to the low likelihood of the presence or potential of ASS.

Based on the current lease agreement for the Site, EP Risk was unable to attend site to complete the additional investigation works, including a soil treatment trial, and as such EP Risk is unable to provide a Detailed RAP. Upon consultation with the appointed Site Auditor, it was agreed that a framework RAP would be sufficient for the development application process, and that the Detailed RAP and/or RWMS would be prepared once Site access can be granted to EP Risk to undertake further soil investigation works.

Given the above, a Framework Remediation Action Plan (RAP) has been prepared by EP Risk (**Appendix P**). The Framework RAP sets out preferred remedial strategies to mitigate the potential contamination impacts that could result from the development of the site, further site investigation required prior to remedial works, and a summary of the remedial works that are likely to be required.

Based on the review of the DSI and the framework RAP, Harwood Environmental Consultants has prepared their Interim Audit Advice confirming that the Auditor agrees with the proposed remedial strategy provided in the Framework RAP based on the existing data set, noting that the remedial strategy may change based on the findings of the data gap investigations.

The Interim Audit Statement requires a Sampling and Analysis Quality Plan (SAQP) to be prepared for the data gap investigation and for this to be provided to the Auditor for review prior to works commencing.

Mitigation Measures

- A detailed remediation action plan is to be developed in accordance with NSW Office of Environment and Heritage (OEH) (2020) Guidelines.
- Sampling and Analysis Quality Plan (SAQP) to be prepared for the data gap investigation and for this to be provided to the Auditor for review prior to works commencing.
- A Construction Environmental Management Plan (CEMP) will be required prior to commencing remedial works in accordance with the approved remediation action plan (RAP).

Subject to the completion of the remedial works and a site validation assessment, the site can be made suitable for development.

6.2. STANDARD ASSESSMENT IMPACTS

This section of the report addresses the matters which require a standard assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

6.2.1. Flooding

Enstruct were engaged to prepare a Civil Engineering Report (**Appendix T**) which considers the flood risk and sets out the stormwater management works associated with the proposed development. A summary of the assessment and recommended mitigation measures is provided below.

Existing Environment

The site is located near a sag point on Bourke Road and is located in a high flood risk zone with major overland flow expected at or near the site. Enstruct reviewed Council's flood model results and found that the site's 1% AEP flood level is at 8.8 mAHD, while the Probable Maximal Flood (PMF) level varies from 10.3 mAHD to 10.4 mAHD.

Potential Impacts

The proposed health centre is classified as a critical facility within the City of Sydney Interim Floodplain Management Policy and therefore all habitable floor levels are required to be at least at the PMF level (10.4mAHD).

All entrance levels to the basement including the vehicle ramp, stairwells, ventilation and lifts will be designed to be protected from flooding during a PMF event. By ensuring all the entries to the basement are at the PMF level, Enstruct conclude the floor level of the basement is acceptable.

During a major flood event, it is expected the flood evacuation strategy will follow a "shelter in place" system, given Bourke Road will be flood affected. The site is flood affected and hence multiple measures such as ensuring all habitable floors and all basement entries are at least at the PMF level (10.40mAHD) to satisfy the Flood planning levels based on the City of Sydney flood model.

Overall, the report concludes the site is in a flood safe area and is suitable for the proposed development subject to the adoption and implementation of the above mitigation measures.

6.2.2. Trees and Landscaping

Two mature Broad-leaved Paperbarks and a young Brush Box are located within the existing verge in front of the site. The tree to the south (Paperbark) is proposed to be removed to facilitate the driveway into the new development, in accordance with Council's laneway design. To mitigate the tree removal, four native quandong trees will be planted along the Bourke Road frontage in the proposed deep soil zone. Refer to the Arboricultural Impact Assessment at **Appendix GG**.

The tree plantings will increase shade along Bourke Road and reduce urban heat islanding affects. The reference scheme includes planted areas with a mix of native plants, sandstone boulders and timber logs to provide habitat for small birds, insects and other. The softscape areas will assist with onsite infiltration of stormwater.

6.2.3. Biodiversity

Section 7.9 of the *Biodiversity Conservation Act 2016* requires preparation of a Biodiversity Development Assessment Report for SSD that are assessed under Part 4 of the EP&A Act. This Concept SSDA will be assessed under Part 4 of the EP&A Act, and, therefore, would normally be required to include a BDAR.

However, section 7.9(2) of the BC Act 2016 allows for exemption from the requirement where the development is not likely to have any significant impact on biodiversity values. A request for a waiver for submission of a BDAR was submitted to the DPE and the Office of Environment and Heritage.

Subsequently, a waiver under section 7.9(2) of the BC Act 2016 was issued on 26 April 2022 and is provided at **Appendix R**. Accordingly, a BDAR is not required to be submitted with this EIS.

6.2.4. Waste Management

An Operational Waste Management Plan and Construction & Demolition Waste Management Plan has been prepared by Foresight Environmental (**Appendix W**). The OWMP identified the estimate waste and management minimisation and storage requirements which reflect best-practice and promote strong sustainability initiatives.

Potential Impacts

The Operational WMP identifies the expected resource streams based on the proposed land use activities. The total waste generated by the development is estimated to be:

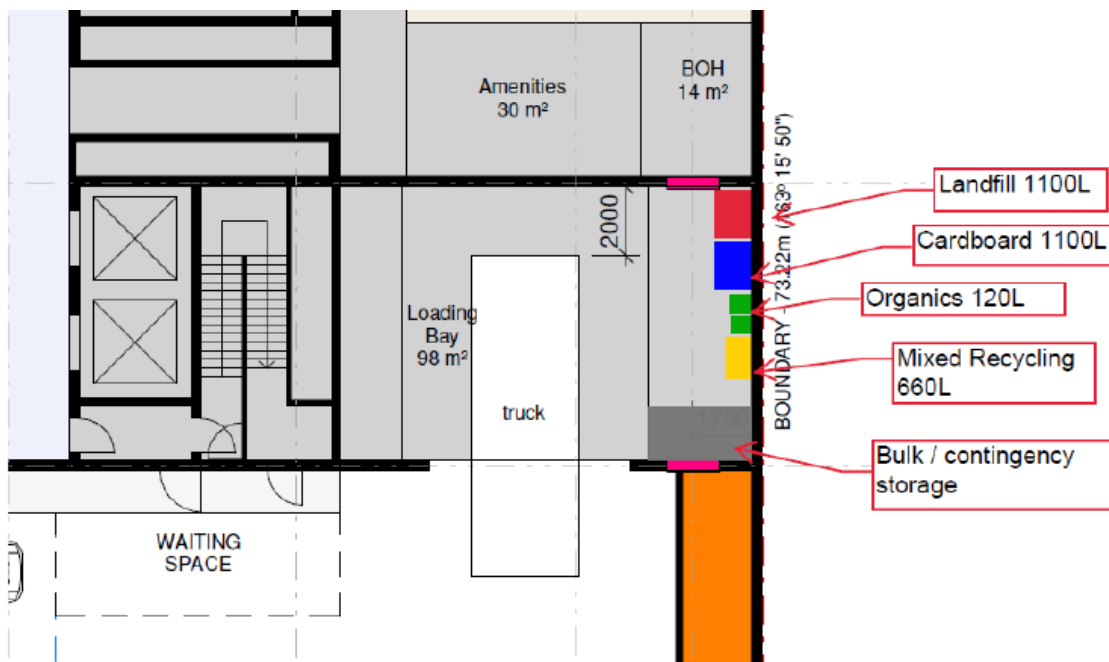
- Landfill: 5,359L per week
- Paper: 5,130L per week

- Organics: 886L per week
- Mixed recycling: 1,693L per week
- Cardboard: 4,400L/ per week.

The various laboratory and clinical operations within the facility will produce a variety of special waste streams that will need to be managed in accordance with hazardous waste disposal guidelines and legislative requirements.

Based on Foresight Environmental's expected waste generation, it is anticipated that 14.9m² of floor space will be required for the bin room and 16.2m² is proposed. The waste storage area for the development is located on ground level and provides sufficient capacity for the recommended systems for the development. **Figure 18** below shows the indicative layout of the waste storage area adjacent to the loading dock.

Figure 18 Indicative waste storage area layout



Source: Foresight Environmental

Waste Servicing

The appointed waste contractor will be able to access the site via the proposed side street off Bourke Road. Collections will occur from the loading dock on an agreed after-hours collection schedule (likely between 10pm- 6am – to be confirmed in collaboration with appointed waste contractor).

Construction and Demolition Waste Management

Foresight Environmental have prepared a Construction and Demolition Waste Management Plan (**Appendix W**). The plan details how the proposed development will manage the waste and recycling generated during the demolition and construction phases of the development.

The estimated volume of demolition waste is 535m³ and the estimated volume of construction waste is 518m³. Demolition and construction waste will be crushed and reused onsite or collected by a contractor and processed at a waste facility.

Designated waste storage areas will be established for the collection of all waste and recyclables. The waste storage areas shall have appropriate signage to clearly identify the area to construction workers and to prevent unauthorised access to the area.

Mitigation Measures

- Waste and recycling contractors will be required to comply with the Construction and Operational WMP requirements to achieve and maintain best practice.

- The laboratory and clinical operations special waste streams are to be managed in accordance with relevant hazardous waste disposal guidelines and legislative requirements.
- Clear signage identifying the various streams and appropriate use is to be prominently displayed.
- Provide bin hubs for common waste streams in common areas.
- Spill kits should also be made available in all areas where chemical waste areas generated.
- All sharps are to be collected in a rigid, puncture-proof container that meets Australian Standard requirements (AS 4031).
- An E-waste bin will be located in the waste storage area on ground level.
- Active site management during the construction phase will ensure all waste/recyclable materials are disposed of appropriately and that all waste receptacles are of sufficient capacity to manage onsite activities.
- Hazardous construction materials should be disposed of in accordance with EPA guidelines in order to protect the environment and personnel.

Overall, it is concluded the operational phase of the development can be effectively managed to reduce, re-use, recycle and dispose of waste to avoid unacceptable environmental impacts.

6.2.5. Ecologically Sustainable Development

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

- The precautionary principle
- Intergenerational equity
- Conservation of biological diversity and ecological integrity
- Improved valuation, pricing and incentive mechanisms

An Environmentally Sustainable Development (ESD) Report has been prepared by LCI Consultants (**Appendix X**). The report identifies the design initiatives and features of the proposed development that hold the potential to reduce the overall environmental impact.

Potential Impacts

An assessment against the ESD principles is outlined below.

Precautionary principle

The proposal will be constructed on a previously developed site, consisting of existing industrial facility and hardscaping. This will not have an adverse environmental impact and therefore alleviates concern of serious or irreversible environmental damage. Proactive measures to prevent environmental degradation have been included within the design, construction and operational phases of the proposed development.

Inter-Generational Equity

To uphold inter-generational equity, the proposal minimises the consumption of energy and water resources while reducing waste. The ESD principles incorporated into the proposal will facilitate the conservation of energy and water resources through energy and water efficiency measures. The reduction in water use has been considered through fixtures and fittings, low water demand landscaping and use of non-potable water sources (harvested rainwater) where appropriate. Waste generated during the construction and operational phases will be diverted from landfill to be recycled.

Conservation of Biological Diversity and Ecological Integrity

The principles to reduce energy, water and waste consumption have an indirect impact to conserve biodiversity and ecological integrity to the surrounding area. By minimising demand on energy and water

resources, the need for land-clearing and the pollution generated from new Alexandria Health Centre to support the surrounding area will be minimised.

Improved Valuation

An Environmental Management System will be adhered to during construction to ensure that contractors are responsible for costs associated with generating excessive pollution and waste. The project will be designed to meet or exceed the NCC Section J 2019 (Energy Efficiency Provisions).

The proposal has utilised the Green Star Design and As-built V1.3 rating tool as an equivalence framework to guide the project in aligning with 'Australian Best Practice' and targeting initiatives that exceed relevant industry recognised building sustainability and environmental performance standards, such as the National Construction Code 2019 Section J Energy Efficiency Provisions.

Mitigation Measures

The key ESD strategies for consideration during detailed design include:

- Employ passive ESD measures such as external shading or high-performance facades to reduce peak summer solar gain, maximise annual building energy, and create occupant comfort through effective daylighting.
- Consider implementing Water Sensitive Urban Design features such as water efficient fittings and appliances, rainwater tanks to reduce potable water consumption and costs, proprietary devices and other approved site-specific measures to reduce pollution from stormwater entering local waterways.
- Consider the use of low embodied carbon materials throughout the development in reducing upfront carbon emissions
- Consider high performance heating, ventilation and air conditioning (HVAC) systems.

LCI conclude that subject to the implementation of the above mitigation measures, the project will improve its ecological sustainability.

6.2.6. Public Space

The proposal will improve the urban realm experience by providing landscaping features, larger setbacks, through site links and places to stay and sit. The improved urban realm will have a high positive impact on local residents and future patients, visitors and staff who use and work within the proposed facility.

The development contributes to the desired character of the Alexandria locality. The proposal dedicates land for a public road identified on the Streets and lanes map (Draft Sydney Development Control Plan 2012 – Southern Enterprise Area). The two proposed laneways will provide access to the public, supporting pedestrian connections between the Ashmore Connector and Shea Creek revitalisation (per the Southern Enterprise Planning Proposal).

6.2.7. Aboriginal Cultural Heritage

Urbis Heritage were engaged to prepare an Aboriginal Cultural Heritage Assessment (ACHA) to support the proposed development (**Appendix Y**). The ACHA addresses the relevant requirements of the SEARs and has been carried out in accordance with Part 6 of the National Parks and Wildlife Act 1974 (NPW Act) and Part 5 of the National Parks and Wildlife Regulation 2019 (NPW Reg) and the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (Department of Environment, Climate Change and Water (DECCW), 2010) (the Consultation Guidelines).*
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (Office of Environment and Heritage 2011) (the Assessment Guidelines).*
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) (the Code of Practice).*
- *The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, 2013 (Burra Charter).*

Potential Impacts

The ACHA concluded that:

- No Aboriginal objects or Aboriginal places are registered within the subject area.
- No previous Aboriginal archaeological investigations have been identified that directly address the subject area.
- The subject area is located in the Tuggerah soil landscape and within 200m of a first order, ephemeral waterway, which is an archaeologically sensitive landscape feature.
- Historical activities, including construction and demolition of buildings and utilisation of the subject area for industrial purposes, are determined to have caused a high level of ground disturbance across the subject area.
- Geotechnical findings confirm the impact of historical activities on the soil profile, with disturbance being encountered to a minimum depth of 0.6/1.9m below the existing ground surface. There is nil to low potential for Aboriginal sites within the disturbed soil layers.
- Geotechnical findings further indicate the presence of an intact natural sand body below approximately 0.6/1.9m, likely the Tuggerah soil landscape, which is an archaeologically sensitive landform. This natural sand body has been identified with the potential for archaeological resources dating to the Pleistocene.
- The subject area has moderate archaeological potential for artefact scatters / campsites, burials, isolated finds, middens and PADS dating to the potentially the Pleistocene within intact natural soil at depths exceeding 0.6/1.9m below the existing ground surface.
- The subject area is determined to have moderate Aboriginal cultural heritage significance for its scientific value associated with the potential for Aboriginal objects dating to the Pleistocene.
- If any Aboriginal objects are retained within intact natural soils below the existing ground surface, they would have high scientific significance as rare examples of occupation of the Sydney basin and for their potential to contribute to an understanding of the cultural history of the region.
- Any physical works in the subject area that impact the ground below 0.6m/1.9m or more have the potential to directly harm Aboriginal objects. The assessment for subsurface impacts will need to be confirmed in Stage 2 of the SSDA once the proposed works are finalised.

Mitigation Measures

Based on the above conclusions, Urbis recommends the following:

- Consultation with the Registered Aboriginal Parties (RAPs) should continue until the finalisation of the proposed development to ensure the opportunity for community input.
- As suggested by the RAPs during the consultation process, Native planting should be considered within the proposal at Stage 2 of the SSDA.
- Any physical works in the subject area that impact undisturbed subsurface soil below a depth of 0.6m/1.9m should be further investigated to understand if Aboriginal archaeological resources are present.
- Once the detailed design and physical impacts from the proposal have been finalised at Stage 2 of the SSDA, the recommendations and potential harm and impacts to Aboriginal objects should be refined and reconsidered.

Urbis Heritage conclude that, subject to the implementation of the above mitigation measures, the site is suitable for development.

6.2.8. Environmental Heritage

Urbis Heritage was engaged to prepare a Heritage Impact Statement (**HIS**) (**Appendix AA**) and Historical Archaeology Impact Assessment (**Appendix Z**) to assess the impacts of the proposed development on

surrounding heritage items and potential archaeological elements. A summary of the assessment and recommended mitigation measures is provided below.

Existing Environment

The historical background to the site and its development is reviewed in detail, from European settlement to 19th century industrialisation. The site was likely used as an industrial complex during the early 1900s. In summary:

- The subject site is not identified as a heritage item on any statutory or non-statutory list or register.
- The site is not located within the vicinity of any heritage items.
- The site is not located within a Heritage Conservation Area (HCA).
- The subject site is within the vicinity and visual catchment of the former Paul Roberts and Parsons warehouse building at 5 Bourke Road (to the north-east of the site). This building is identified as a potential heritage item within the 2014 warehouse study, however its listing has never been formalised.
- The existing buildings appear to date to the Inter-War period, owing to the visible presence of construction materials and techniques that were characteristic of that period.
- The subject site, comprising two original primary structures which have been amalgamated, were both constructed in the mid-20th century.

Environmental Heritage Impacts

The proposed development has been assessed to have no heritage impact on the significance of the subject site and surrounding pertinent heritage significance. Key aspects of the assessment are listed below:

- The proposed development would not entail work to a heritage item, nor to a site within an HCA, or in the vicinity of listed heritage items. There would, therefore, be no impacts on any heritage items or conservation areas, including on any significant fabric, setting, or views.
- The proposal involves demolition of Inter-War warehouse buildings that are over 50 years (albeit not heritage listed or located within an HCA). However, the site is found to be of no heritage significance, as based on the detailed significance assessment carried out in Section 4. As such, the proposed demolition of the existing buildings is not considered to generate any unreasonable heritage impacts.
- The proposed development is commensurate with the broader strategic objectives of redevelopment around Green Square and demonstrates an orderly approach to development within the area.

Archaeological Impacts

- In general, there is Low potential for historical archaeological resources to occur in conjunction with the early agricultural phases at the subject site, with moderate potential associated with the early industrial land use phase (c.1900s-c.1943).
- Archaeological resources which may occur at the subject site, including general discard items, rubbish dumps and structural remains of industrial workshops, are anticipated to meet the threshold for significance on a Local level, specifically for their historic value and research potential. Relics of Local significance will be primarily associated with the early industrial land use phase, with earlier relics not anticipated to be retained with sufficient integrity.
- The detailed design will be subject to a further SSDA process at a later stage. Due to the nature of the approval sought, there are no impacts currently proposed to occur at the site. However, this impact assessment has considered the likelihood that impacts would occur at the site on the basis of the concept design. As the concept design involves a 1-1.5m basement excavation across the whole of the site, this is likely to remove all previously accumulated archaeological deposits and result in a total impact to any relics of Local significance which may occur. As such, mitigation measures should be implemented at demolition and construction phase. This should be in accordance with the below recommendations.

Mitigation Measures

- **Archival recording:** Prior to the commencement of any works on the site (following a Stage 2 development application), the existing buildings at the site are to be archivally recorded in accordance with the relevant guidelines published by the Heritage Council of NSW. The archival recordings should capture the existing buildings, externally and internally, and include images of their current setting.
- Once the detailed design and physical impacts from the proposal have been finalised at Stage 2 of the SSDA, the impact assessment, archaeological potential mapping and recommendations should be refined and reconsidered, and this report updated.
- At Stage 2 SSDA an Archaeological Research Design (ARD) should be prepared by a suitably qualified archaeologist to develop a methodology for the investigation and management of potential locally significant relics across the subject site. This should include methodologies for monitoring and test excavation, as well as salvage excavation should that be deemed necessary.
- 3. In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

All works within the vicinity of the find immediately stop.

Site supervisor or other nominated manager must notify the NSW Police and the Department of Premier and Cabinet.

The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.

Management recommendations are to be formulated by the Police, Department of Premier and Cabinet and site representatives.

Works are not to recommence until the find has been appropriately managed.

In conclusion, the proposed works are recommended for approval from a heritage and archaeology perspective.

6.2.9. Social Impact

A Social Impact Assessment (**SIA**) has been undertaken by Urbis to assess the potential positive and negative social impacts arising from the proposed development (**Appendix BB**). The SIA involves a detailed and independent study to scope potential social impacts, identify appropriate mitigation measures and provide recommendations aligned with professional standards and statutory obligations.

Assessment

The following methodology was undertaken to prepare this SIA. The methodology was informed by the guidance contained within the DPIE SIA Guidelines for State Significant Projects (2021).

Table 15 SIA Methodology

Background review	Impact scoping	Assessment and reporting
<ul style="list-style-type: none"> ▪ Review of surrounding land uses and site visit ▪ Review of relevant state and local policies to understand potential implications of the proposal ▪ Analysis of relevant data to understand the existing community. 	<ul style="list-style-type: none"> ▪ Review of site plans and technical assessments ▪ Consultation with Council to identify potential impacts ▪ Review of engagement outcomes ▪ Identification of impacted groups ▪ Initial scoping of impacts. 	<ul style="list-style-type: none"> ▪ Assessment of significant impacts considering management measures ▪ Provision of recommendations to enhance positive impacts, reduce negative impacts and monitor ongoing impacts.

Urbis prepared a community profile has been developed for the suburb of Alexandria, based on Australian Bureau of Statistics data. Key characteristics of the community include:

- Young adult population
- High proportion of social housing in Waterloo
- A diverse community
- High proportion of health care workers
- Mixed income levels
- Strong population growth.

A range of impacts were assessed against the Social Impact Assessment criteria:

- Impact on Aboriginal culture and heritage
- Increased availability of health sector jobs
- Potential pressure on the traffic network
- Amenity impacts during construction
- Visual change
- Delivery of targeted mental health services
- Providing holistic and integrated care
- Improved urban realm.

The three latter social impacts identified above are considered to result in moderate to high impacts and have been assessed further. The table below summarises the potential social impacts associated with the proposed development.

Table 16 Summary of Potential Social Impacts

Description of Impact	Potentially Impacted Groups	Overall Impact Rating
<p>Delivery of targeted mental health services:</p> <p>Private sector health services play an important role in providing health care and alleviating pressure on the public health system. The proposal will fill an important gap in short stay, intensive care for people with mental ill health. The financial barriers for some people in the community will limit access and reduce the overall social impact, decreasing it from a very high positive to a high positive impact on residents across Sydney with private health insurance.</p>	<ul style="list-style-type: none"> ▪ Alexandria and Waterloo residents ▪ City of Sydney LGA residents ▪ Sydney Local Health District residents ▪ Metro Sydney residents. 	High positive
<p>Providing holistic and integrated care:</p> <p>The proposal will provide a new centre that integrates a mental health hospital with medical centre uses including a GP clinic, pharmacy and other allied health providers in an easily accessible location. Providing integrated care within the one centre is a preferred approach from a mental health</p>	<ul style="list-style-type: none"> ▪ Alexandria and Waterloo residents ▪ City of Sydney LGA residents ▪ Sydney Local Health District residents 	High positive

Description of Impact	Potentially Impacted Groups	Overall Impact Rating
service perspective as it encourages a holistic mental and physical approach to patient recovery. Providing holistic and integrated care will have a high positive impact on future patients and staff who use and work within the proposal.	<ul style="list-style-type: none"> Sydney residents. 	
Improved public realm: The proposal will improve the urban realm experience by providing landscaping features, larger setbacks, through site links and places to stay and sit. The improved urban realm will have a high positive impact on local residents and future patients, visitors and staff who use and work within the proposal.	<ul style="list-style-type: none"> Alexandria and Waterloo residents Future staff, visitors and patients of the proposal. 	High positive

Mitigation Measures

The following recommendations are provided to further manage the potential impacts from the proposal:

- Consider ways to partner and/or connect with Royal Prince Alfred HealthOne as a referral pathway for patients who may not be able to afford the services provided at the proposal. HealthOne is an integrated public health centre operated by the Sydney Local Health District and provides a range of health care services, including mental health services.
- Connect with Royal Prince Alfred Hospital (RPAH) and implement a referral pathway for patients whose condition worsens and who may require longer-term and/or involuntary care in the public system.
- The future operator of the proposal to consider implementing affordable community outreach programs and/or events with a focus on early intervention, health promotion and prevention messaging to connect with the local community.
- Consider having GPs and/or allied health services that bulk bill or provide affordable care for people on lower incomes or without private health insurance.
- Implement a landscape maintenance plan for the site to ensure trees, low-level planting and climbers are well maintained.
- Consider implementing CCTV at car park entrances to minimise opportunities for crimes related to car theft and damage.
- At the detailed design stage, implement a lighting strategy with particular focus on the laneways, car parking areas and outdoor seating to ensure staff and visitors feel safe at all times of the day.

Based on this assessment and the recommendations provided, the proposed Alexandria Health Centre will have an overall high positive impact on the local and LGA wide communities, as well as more broadly communities in the Sydney Local Health District and in Sydney.

6.2.10. Building Code of Australia and Access

A Building Code of Australia and Disability Discrimination Act Capability Statement has been prepared by Blackett Maguire Goldsmith (**Appendix CC**) to assess the compliance of the concept scheme against the National Construction Code.

Assessment

The proposed development must comply with the relevant Performance Requirements of the National Construction Code (NCC) and Building Code of Australia (BCA) through:

- Performance Solution; or
- Deemed-to-Satisfy Solution (DtS); or
- A combination of (a) and (b).

BMG conclude that the proposed design will include solutions with a combination of compliance with the DtS provisions and Performance Requirements of the NCC/BCA, the latter with justification of Performance Solutions prepared by suitably Registered/Accredited Consultants.

Detailed documentation demonstrating compliance with the NCC/BCA will be required for assessment during detailed design. BMG concludes that the SSDA documentation indicates that compliance the design is capable of compliance.

6.2.11. Infrastructure Requirements and Utilities

Infrastructure

LCI has prepared an Infrastructure Report (**Appendix DD**) that identifies the existing services and infrastructure within the vicinity of the site and the proposed augmentation connection required to service the proposal.

Assessment

LCI have reviewed DBYD information received from utilities including Sydney water, Ausgrid, Telstra, Optus and calculated electrical maximum demand, based on the architectural plans and areas schedule.

The DBYD information shows that major electrical, communications and other services reticulate along Bourke Road adjacent to the development boundary. Any works outside or crossing the boundary must be coordinated with the affected utilities.

The report identifies the existing infrastructure available to the site, including electrical services and communications service. Drawings from the relevant service providers are attached to the Infrastructure Report, outlining the location of existing services in relation to the site. The proposed infrastructure requirements to service the proposed development are summarised below.

- **Electrical:** The electrical demand for the development is estimated to be approximately 1719kVA including 20% spare capacity (2406Amps). It is anticipated that two (2x) kiosk-type substations are required to provide capacity for the proposal. An application for connection has been lodged with Ausgrid.
- **Communications:** the site can be connected to the NBN via the exiting Telstra infrastructure along Bourke Rd to provide telephone and data services. An application to Connect will be lodged with service type determined by NBN during detailed design.

Utilities

Warren Smith Consulting Engineers has prepared an Infrastructure Utilities Assessment Requirements Report (**Appendix DD**) that identifies the existing services within the vicinity of the site, establishes the impact on existing utility assets from the proposed development and the proposed augmentation connection required to service the proposal.

Assessment

To determine the total water usage for the building the Sydney Water average daily water usage patterns of different property types document from Sydney Water has been used which nominates 2.48 L / day / m². Therefore the water peak demand is 42.16kL per day.

A water servicing coordinator is not yet assigned and the section 73 application process has not been commenced. The notice of requirements once received from Sydney Water will inform which sanitary drainage asset can have connections made to it and the available capacities.

The utility service providers will consider the cumulative impact of the approved and proposed developments within the locality on future demand and to ensure there is sufficient system capacity for the current proposal, as well as any future developments in the surrounding area.

6.2.12. Construction, Operation and Staging

It is noted that the proposal is will be subject to a competitive design alternatives process and a detailed SSD application. Construction, operation and staging details will be examined in detail during the detailed SSDA process.

6.2.13. Public Benefit and Contributions

S7.11 Contributions

S7.11 contributions are levied on development consents via a condition of consent based on the City of Sydney's adopted contribution rates based on GFA/worker. It is anticipated that the SSDA conditions of consent will require the payment of s7.11 contributions.

City of Sydney Affordable Housing contribution

The Green Square and Southern Employment Lands Contribution rates have ceased to apply for development consents granted after 1 July 2021. The City of Sydney Affordable Housing Contribution will apply to all developments in the City of Sydney.

On land in Green Square and in the Southern Employment Lands, the contribution rate is:

- 1 per cent of the total floor area that is to be used for non-residential uses, and
- 3 per cent of the total floor area that is to be used for residential uses.

The equivalent monetary contribution amount effective from 1 March 2022 to 28 February 2023 is \$11,599 per sqm.

It is understood that the contribution rates quoted in a development consent will be indexed to ensure they reflect the costs associated with providing affordable housing units over time.

Green Square Community Infrastructure Contribution

Clause 6.14 of the LEP specifies the maximum additional FSR (above that shown in the FSR Map) that a site may potentially achieve if "equivalent" community infrastructure is included with the development. Clause 6.14 further defines "equivalent" community infrastructure as:

"development at Green Square for the purposes of recreation areas, recreation facilities (indoor), recreation facilities (outdoor), public roads, drainage or flood mitigation works."

The City uses a dollar rate to establish the minimum cost so that it is equivalent to the additional floor space being achieved under clause 6.14.

The total dollar value of the community infrastructure package is calculated based on the type of use and amount of additional floor space proposed under clause 6.14 of Sydney LEP 2012.

The Community Infrastructure Contribution package will be agreed between the Council and the applicant as part of a Voluntary Planning Agreement (VPA). A draft VPA letter of offer has been prepared and is provided at **Appendix I**. It is noted that the VPA will not exclude the application of s7.11 and s7.12 of the EP&A Act to the development.

7. JUSTIFICATION OF THE PROJECT

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1. PROJECT DESIGN

This SSDA seeks consent for a concept development application for the Alexandria Health Centre, including a concept proposal for a new hospital and medical centre building and public domain works.

Alternatives Considered

Centuria identified project alternatives which were considered in respect to the identified need for the proposed hospital and medical centre. Each of these options is listed and discussed below.

Option 1 – Do Nothing

This option was dismissed as the objectives of the project would not be met. If the proposal was not to proceed, the site would remain vacant and the existing building would likely deteriorate. The site would not realise its capacity to accommodate the hospital and medical centre which will provide a key piece of community infrastructure servicing the broader community

Option 2 – Alternative Location

Consideration to alternative sites was given, however these were dismissed as the subject site resulted in the most beneficial outcomes for the proposal and ensures the site can accommodate a hospital and medical centre which will provide a key piece of community infrastructure servicing the broader community as:

- the site is compatible with adjoining and surrounding industry and employment generating uses within the North Alexandria precinct.
- the potential environmental impacts of the proposal can be suitably mitigated to avoid unacceptable impacts on the amenity of nearby properties.
- the proposal will not affect any area of heritage or archaeological significance.
- the proposal can be developed with appropriate visual amenity given its surrounding context.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no adverse economic, environmental or social impact

Mitigation Measures

As demonstrated in Section 6 of this EIS, the proposal is capable of being constructed and delivered subject to the impact mitigation measures defined within **Appendix E**. Generally, key mitigation measures relate to the following impacts:

- Built Form and Visual Impact;
- Ecologically Sustainable Development;
- Stormwater Management and Flooding;
- Waste Management.

Subject to adherence with the mitigation measures listed in **Appendix E**, it is considered that the proposal can be constructed and operated without any undue environmental impact.

7.2. STRATEGIC CONTEXT

The proposal is aligned with the strategic policy objectives as it will provide an essential mental health hospital and medical centre occupied by allied health providers to support the rapid growth in the surrounding precinct. In summary, the proposal aligns with the following relevant strategies and policies:

- **NSW State Priorities:** The proposal will provide a new facility catered to improving the health system. It will provide inpatient and outpatient care to those suffering with mood disorders, anxiety disorders and those with drug and alcohol disorders.
- **Greater Sydney Region Plan:** The proposal will support the shift of the northern Alexandria precinct from primarily industrial uses to a knowledge-based economy. The proposal will therefore assist in the development of internationally competitive health, education, research, and innovation precincts across greater Sydney.
- **Eastern City District Plan:** Providing accessible local health services and regional health infrastructure such as hospitals is important for all people across the district.
- **Sydney Local Strategic Planning Statement:** The proposed development will provide an essential mental health hospital and medical centre to support the rapid growth in the surrounding precinct.
- **Southern Enterprise Area Review:** The proposed built form outcome for the development is seeking to align with the draft amendments to the Southern Enterprise Corridor which are due for finalisation in September 2022.

7.3. STATUTORY CONTEXT

The relevant State and local environmental planning instruments are assessed in **Section 4**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in **Appendix C**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR waiver accordingly.
- This SSDA pathway has been undertaken in accordance with the *State Environmental Planning Policy (Planning Systems) 2021* as the proposed development is classified as SSD.
- The proposal complies with all of the relevant provisions under the Sydney LEP 2012 and Southern Enterprise Area review as detailed in Section 4. The proposed development is consistent with the objectives of the B7 Business Park zone.
- The proposed development has been assessed in accordance with *State Environmental Planning Policy (Biodiversity and Conservation) 2021* and the proposed development complies with the relevant clauses of these SEPP.
- The proposal generally accords with the relevant provisions of the Sydney DCP 2012 as outlined in **Appendix C**.

7.4. COMMUNITY VIEWS

At the time of writing this report, no response has been received from the public. The Applicant will continue to reach out to surrounding local landowners, businesses and stakeholders as plans progress.

Alexandria Property Development welcomes feedback on the proposal and will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- Continuing to engage with the community about the project and its impacts, as the project moves through subsequent stages of the approval process

- Enabling the community to seek clarification about the project through the two-way communication channels.

Further community and stakeholder consultation will be undertaken if the project is approved. The proposed consultation responds to the community feedback during the preparation of the EIS and the community participation objectives in the Undertaking Engagement guide.

7.5. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2021. Further, a BDAR waiver has been granted by DPE, as it was found not biodiversity occurs on the site.
- **Built Environment:** The proposal will improve the urban realm experience by providing landscaping features, larger setbacks, through site links and places to stay and sit. The improved urban realm will have a high positive impact on local residents and future patients, visitors and staff who use and work within the proposed facility.
- **Social:** The proposed hospital and medical centre will have an overall high positive impact on the local and LGA wide communities, as well as more broadly communities in the Sydney Local Health District and in Sydney.
- **Economic:** the proposal will create 700 jobs in construction and 130 full time jobs in operation. Allied health related jobs will be delivered across the balance of the site. The proposal will provide a large investment in infrastructure spending and developer contributions. The proposal will facilitate the orderly and economic development of site in accordance with the relevant planning controls.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix D** to this EIS.

7.6. SUITABILITY OF THE SITE

The site is considered highly suitable for the proposed development for the following reasons:

- The development is permitted with consent in the B7 Business Park Zone and is consistent with the relevant zone objectives.
- The site benefits from access to the regional road network and sustainable transport modes and is compatible with the surrounding development.
- Subject to the implementation of appropriate mitigation measures (refer to **Appendix D**) the proposal will result in minimal environmental impact.
- The proposal is consistent with the aims and objectives of the Southern Enterprise Area Review in that will increase the amount of employment floor space in North Alexandria while also facilitating the dedication of land so that development can be supported by a legible network of public streets, lands and open space and retain the distinct fine grain low-scale built form to the north of north Alexandria.

7.7. PUBLIC INTEREST

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposed use of the site as a 'hospital' and 'medical centre' will provide a key piece of community infrastructure will service the broad community. The facility will provide unique services targeted at privately insured patients aged 18 + with mood disorders. Anxiety disorders, and those with comorbid

drug and alcohol disorders. The facility will provide both inpatient and outpatient services to suit the specific needs of the patients.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

DISCLAIMER

This report is dated 7 July 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Centuria (**Instructing Party**) for the purpose of Environmental Impact Statement (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

SEARS TABLE

APPENDIX B

DETAILED MAPS AND PLANS

APPENDIX C

STATUTORY COMPLIANCE TABLE

APPENDIX D

COMMUNITY ENGAGEMENT TABLE

APPENDIX E

MITIGATION MEASURES TABLE

APPENDIX F

CIV ESTIMATE REPORT

APPENDIX G

ARCHITECTURAL PLANS

APPENDIX H

BUILT FORM AND URBAN DESIGN REPORT

APPENDIX I

VPA LETTER OF OFFER

APPENDIX J

ENGAGEMENT AND COMMUNICATIONS OUTCOMES REPORT

APPENDIX K

LANDSCAPE REPORT AND PLANS

APPENDIX L

DESIGN EXCELLENCE STRATEGY

APPENDIX M

TRAFFIC IMPACT ASSESSMENT AND GREEN TRAVEL PLAN

APPENDIX N

CLAUSE 4.6 VARIATION REQUEST

APPENDIX O

DETAILED SITE INVESTIGATION

APPENDIX P

REMEDIATION ACTION PLAN

APPENDIX Q

INTERIM AUDIT ADVICE

APPENDIX R

BDAR WAIVER

APPENDIX S

NOISE AND VIBRATION ASSESSMENT

APPENDIX T

CIVIL ENGINEERING REPORT

APPENDIX U

CPTED REPORT

APPENDIX V

GROUNDWATER IMPACT ASSESSMENT REPORT

APPENDIX W

WASTE MANAGEMENT PLANS

APPENDIX X

ECOLOGICAL SUSTAINABLE DESIGN REPORT

APPENDIX Y

ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

APPENDIX Z

HISTORICAL ARCHAEOLOGY IMPACT ASSESSMENT

APPENDIX AA

HERITAGE IMPACT ASSESSMENT

APPENDIX BB

SOCIAL IMPACT ASSESSMENT

APPENDIX CC

BCA AND DDA STATEMENT

APPENDIX DD

INFRASTRUCTURE AND UTILITIES REPORTS

APPENDIX EE

SALINITY MANAGEMENT PLAN

APPENDIX FF

ACID SULFATE SOILS REPORT

APPENDIX GG

ARBORICULTURAL IMPACT ASSESSMENT

APPENDIX HH

SURVEY PLANS

