



Planning &
Infrastructure

**STATE SIGNIFICANT DEVELOPMENT
ASSESSMENT REPORT:**

**Stage 1 Development, Acute Health
Service Building, Campbelltown Hospital
Lot 6 DP 1058047, Appin and Therry
Roads, Campbelltown
(SSD 5003)**



Director-General's
Environmental Assessment Report
Section 89H of the
Environmental Planning and Assessment Act 1979

November 2012

ABBREVIATIONS

Applicant	Health Infrastructure
CIV	Capital Investment Value
Department	Department of Planning and Infrastructure
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning and Infrastructure, or his delegate.
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
LEP	Local Environmental Plan
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning and Infrastructure
PAC	Planning Assessment Commission
Regulation	Environmental Planning and Assessment Regulation 2000
RtS	Response to Submissions
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SEPP	State Environmental Planning Policy
SSD	State significant development

HYPERLINKS

[Hyperlinks](#) (CTRL + click to access) are included in this document to allow quick navigation to explanations and interpretations of commonly used legal, scientific or industry terms / phrases used in this document. The explanations / interpretations appear in the glossary appendix. Be sure to print the relevant glossary appendix to enable interpretation of these terms or phrases when printing the main body of the report.

Cover Photograph: Park Central (Marsden Park) Photomontage View

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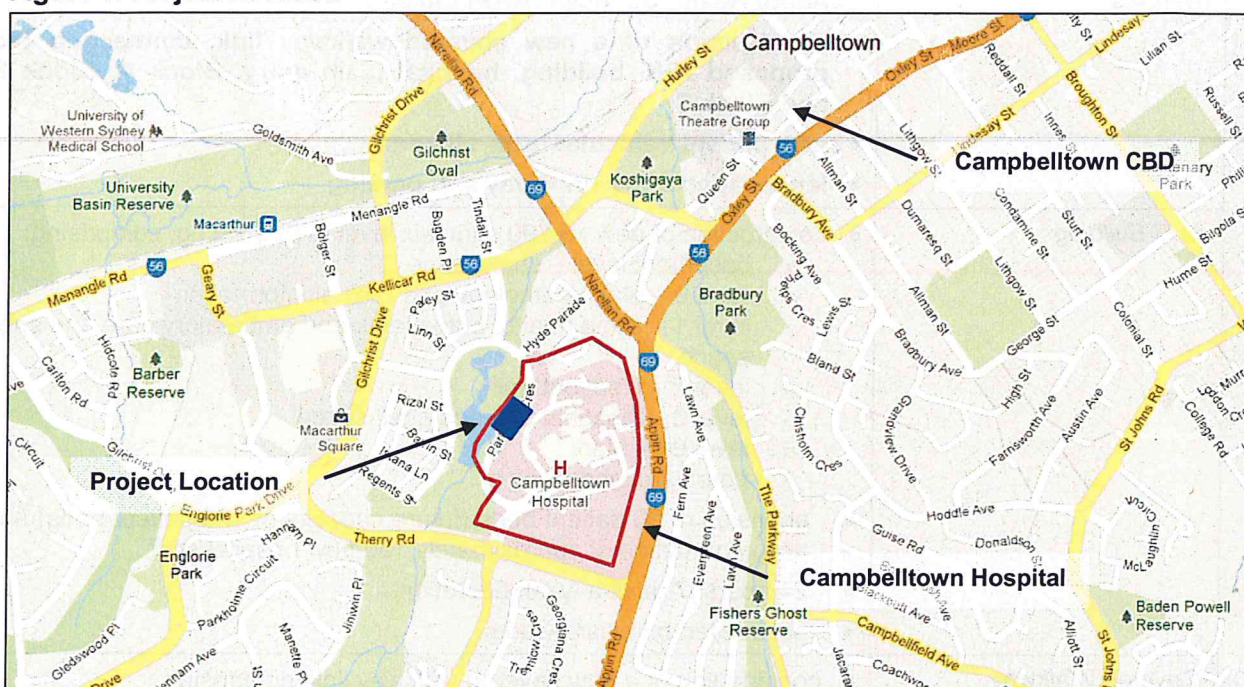
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1. PROPOSED PROJECT & SITE DESCRIPTION

1.1 The Proposal

Health Infrastructure proposes to construct a new six level, 15,790 sqm Acute Health Service (AHS) building providing 90 new beds and accommodating 150 new hospital staff, a new covered walkway link, and a landscaped entry driveway and parking at Campbelltown Hospital (Lot 6 DP 1058047), Appin and Therry Roads, Campbelltown in accordance with State significant development (SSD) provisions under s. 89C of the *Environmental Planning and Assessment Act, 1979* (EP&A Act). The project location is shown in Figure 1.

Figure 1: Project Location



1.2 Site Description

Table 1: Site Description

Topography	Campbelltown Hospital campus has an area of 19.33 hectares. The development site is located on the western edge of the hospital precinct and covers an area of approximately 0.5 hectares, with an approximate 80 m frontage to Therry Road. The development site is clear of any significant vegetation and is relatively level due to its current occupation by the existing Campbelltown Hospital Helipad (approved for relocation by a separate Review of Environmental Factors under Part 5 of the EP&A Act). The interface of the development site and Therry Road, however, is characterised by a large batter that ranges in height from approximately 3.5 m to 7 m.
Site history	The construction of Campbelltown Hospital was undertaken in various stages between 1973 and 2004 on a former agricultural grazing farm and a former golf course site.
Current use of site	The site is currently occupied by Campbelltown Hospital, comprising a number of interconnected hospital buildings, known as Blocks A, B and C, ancillary and associated buildings located around the site, car parking and helicopter helipad.
Surrounding land use(s)	The hospital campus is bound by Appin Road to the east, Therry Road to the south, Parkside Crescent to the west and Campbelltown Private Hospital and the IRT Macarthur Seniors Living Residential complex to the north. The campus is surrounded by predominantly low density residential development, particularly to the east and south. Immediately west of the

	development site is a large public open space area, known as Marsden Park, and a low/medium density residential precinct under development further west.
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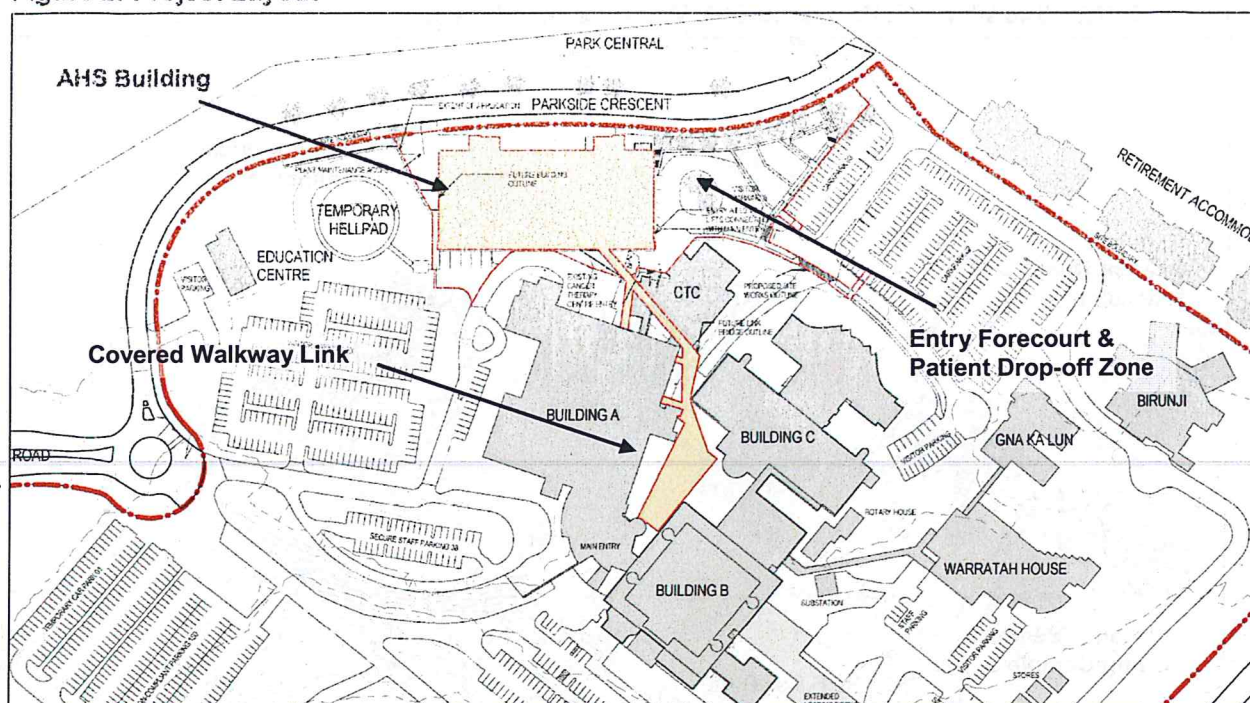
1.3 Key Project Components and Features

Table 2 provides a summary of the development proposal's key components and features. The proposed project layout can be seen in Figure 2.

Table 2: Key Components

Project Summary and features	• stage 1 development involving the construction of a new six level Acute Health Services (AHS) building • construction of a new covered walkway link, connecting the proposed AHS building, hospital main entry, Block A, Block B and Block C • new patient vehicular drop-off zone • landscaped entry driveway and parking
AHS Building	• construction of new 15,790 sqm, six level AHS building, comprising: ○ basement level – shell space ○ level 0 – plant, pathology and clinical information ○ level 1 – allied health, outpatients and ambulatory care and shell space ○ level 2 – inpatient unit ○ level 3 – inpatient unit and shell space ○ level 04 – plant ○ courtyard/landscaping • provision of 90 patient beds (future capacity of 120 patient beds) and accommodation of approximately 150 new hospital staff • 24 hours, 7 days a week operation • associated bulk earthworks
Covered Walkway	• construction of a new covered walkway link, comprising: ○ main enclosed corridor link between the existing Main Entry and Block C at level 1 ○ relocation of existing café ○ new connection to Block A lift core • new enclosed corridor link between Block A and proposed AHS building at levels 1 and 2
Access / Parking	• new patient vehicular drop-off zone at level 1 • six visitor parking spaces • 36 bicycle parking spaces • new service vehicle entry from Parkside Crescent and loading dock at ground level
Public Domain / Landscaping	• new landscaped entry driveway north of the proposed AHS building • internal landscaped courtyards and roof courtyard on level 2 • removal of seven semi-mature trees from Parkside Crescent • communal café area in void area between Blocks A, B and C
Value [CIV] / Jobs	• \$108 million capital investment value • creation of 250 construction jobs and 450 operational jobs

Figure 2: Project Layout



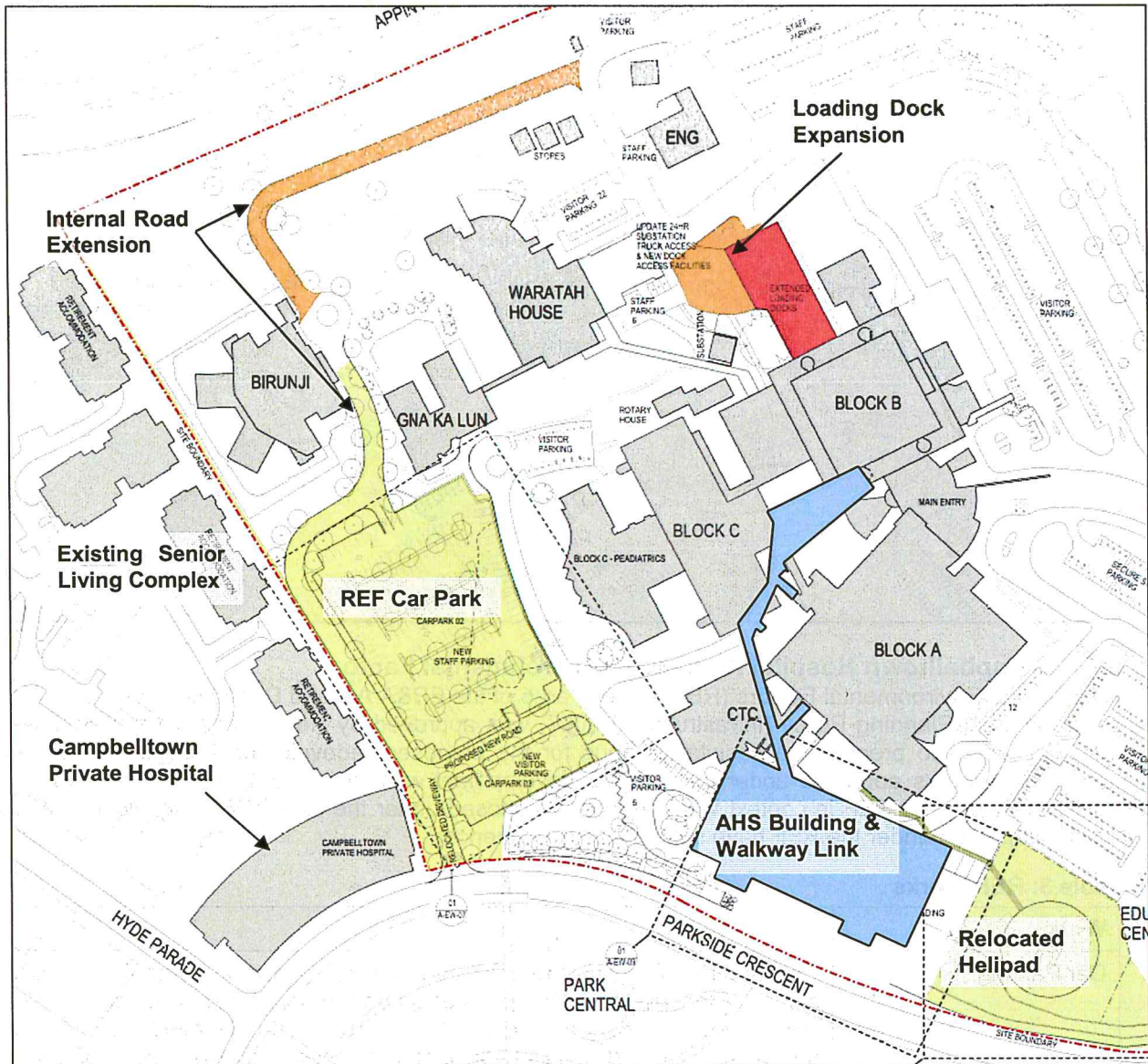
1.4 Campbelltown Hospital Review of Environmental Factors

A Review of Environmental Factors (REF) under Part 5 of the EP&A Act and Divisions 10 and 17 of State Environmental Planning Policy (Infrastructure) 2007, was approved by Health Infrastructure in January 2012 for works to prepare the hospital campus for the proposed redevelopment. Table 3 provides a summary of works approved under the REF as development without consent. Figure 3 depicts works approved under the REF in context with the works proposed under the subject SSD application. Works on site approved under the REF have substantially commenced.

Table 3: REF Works

Work	Description
Car Parking	Construction of a 248 space at-grade car park, located in the north-western corner of the site and 110 space at-grade temporary car park, located along the western boundary adjacent to Therry Road. The approved REF will make provision for a total of 1240 car parking spaces upon completion of stage 1 redevelopment works
Parkside Crescent Entry/Exit	Construction of a new road entry/exit to Parkside Crescent adjacent to Campbelltown private hospital, 25 m north from the existing vehicle crossing. The construction of the new access point will link to the existing internal road network and REF at-grade car park.
Internal Road Network Reconfiguration	Existing internal road network to be extended to connect the REF at-grade car park to the north of the hospital campus.
Services Diversion	Works involving the relocation and diversion of electrical, natural gas, medical oxygen, hydraulic services, sewer and stormwater within the hospital campus. The services diversions and upgrades are required to accommodate and support future expansion of the hospital campus.
Demolition	Demolition of the existing helipad (currently located at the AHS building development site) and existing Block B loading dock.
Helipad Relocation	Relocation of the existing helipad 75 m southwest.
Loading Dock Expansion	Expansion of the existing loading dock area of Block B to accommodate for the hospital's future expansion at a later stage. The increased capacity of the loading dock will also enable clinical waste, general waste and paper cardboard handling, with vehicle access provided for vehicles up to 19 m in length.

Figure 3: REF Site Works & Proposed SSD Works (shaded blue)



2. STATUTORY AND STRATEGIC CONTEXT

2.1 SEPP (State and Regional Development) 2011

The proposal is for State significant development in accordance with s. 89C of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it is development for the purpose of a hospital with a capital investment value (CIV) in excess of \$30 million, under clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011. Therefore the Minister for Planning and Infrastructure is the consent authority.

2.2 Approval Authority

On 14 September 2011, the Minister for Planning and Infrastructure delegated responsibility for the determination of State significant development under Division 4.1 of Part 4 of the *Environmental Planning and Assessment Act 1979* to the Executive Director. The proposal complies with the terms of the delegation as council have not objected to the proposal, a political disclosure statement has not been made and there were fewer 10 submissions in the nature of objections.

2.3 Permissibility and Zoning

The site is zoned 10(a) Regional Centres under Campbelltown Local Environmental Plan 2002. The proposed development is permissible with consent. No specific development standards or controls apply to the site, including setbacks, floor space ratio or height.

2.4 Environmental Planning Instruments

The department's consideration of relevant [EPIs](#) (including SEPPs) is provided in [Appendix B](#). The proposal is consistent with the relevant requirements of the EPIs.

2.5 Objects of the EP&A Act

Decisions made under the EP&A Act must have regard to the [objects of the EP&A Act](#), as set out in section 5 of the EP&A Act. The proposal complies with the objects as the proposed Stage 1 Acute Health Services development at Campbelltown Hospital represents the development of the Campbelltown-Macarthur region for the purpose of promoting social and economic welfare of the community. Further the proposed new AHS building makes provision for new and improved community services and facilities, which are proposed to be constructed in an ecologically sustainable manner.

2.6 Ecologically Sustainable Development

The EP&A Act adopts the definition of [Ecologically Sustainable Development](#) (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes.

The department has considered the project in relation to the ESD principles. The Precautionary and Inter-generational Equity Principles have been applied in the decision making process via a thorough and rigorous assessment of the environmental impacts of the project. The proposal is considered to be consistent with ESD principles as described in Section 4.10 and Appendix R of the applicant's EIS and Section 2.2 of the applicant's Response to Submissions, which has been prepared in accordance with the requirements of Schedule 2 of the Regulation.

2.7 Environmental Planning and Assessment Regulation 2000

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

2.8 Strategic Context

The department considers that the proposal is consistent with and/or supports the following local/state/regional strategies:

- key policy commitments of the NSW Plan 2021, including an increased investment in infrastructure that will provide for improved health services and increased employment opportunities and stimulate the growth of critical industries that will support the growth and rebuilding of NSW
- the aims and objectives of the Metropolitan Plan for Sydney 2036, through its contribution to the provision of social infrastructure within the region, provision for improved health outcomes and employment opportunities and the clustering of health infrastructure around existing health precincts
- the aims and objectives of the South West Subregion Draft Subregional Strategy, by supporting the development and growth of Campbelltown-Macarthur as a Regional City through the provision of high level health services that would be relied upon by surrounding regions
- investment in employment generation with a CIV \$108 million
- job creation through 250 new construction and 450 operational jobs.

2.9 Director-Generals Requirements

Section 5 of the EIS addresses compliance with the Director-General's Requirements. These matters have been addressed in the EIS sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

3. EXHIBITION CONSULTATION AND SUBMISSIONS

3.1 Exhibition

In accordance with s. 89F of the EP&A Act and cl. 83 of the Regulation, the Director-General has made the application and accompanying information publicly available in accordance with the Regulation for at least 45 days following the date of first publication (including a 15 day extension to account for the NSW Easter Holiday period), (see Table 4).

Table 4: Exhibition Details

Exhibition/Notification	Format	Dates
Publicly exhibited	DPI Bridge Street office and Campbelltown City Council's Civic Centre and on the department's website	12 April to 28 May 2012
Newspaper notice	Sydney Morning Herald and Daily Telegraph	Published 11 April 2012
Newspaper notice	Campbelltown Macarthur Advisor	Published 11 April 2012
Written notices to	Landholders, public authorities, local community groups	Dated 4 / 5 April 2012

3.2 Public Authority Consultation and Submissions

The department received six submissions during the exhibition of the application – four submissions from public authorities and two submissions from the general public. A summary of the issues raised in submissions is provided below as detailed in Table 5.

Table 5: Public Authority Submissions

Agency	Comments	Department Comment
Campbelltown City Council	- the internal hospital road layout should be designed to encourage vehicle entry/exit via Central Road rather than Parkside Crescent - Parkside Crescent should not be regarded as an alternate access point to the hospital as detailed in the Traffic and Parking Report (TPR) unless carriageway widening is undertaken - no consideration of access for plant and maintenance provided - the TPR's estimated existing and future car parking demand is unacceptably low and will result in further parking congestion and demand along Parkside Crescent - the TPR does not provide a breakdown of parking demand for each hospital facility - the exemption sought from council's section 94A development contributions plan is not supported - the massing and scale of the building façade and street level retaining walls are of significant concern - the development does not interact positively with the public domain - Parkside Crescent and Central Road would be inundated by overland flow floodwaters and require Central Road to be ungraded to ensure access is maintained - detailed hydraulic analysis is required due to a Probable Maximum Flood and to determine the existing capacity of the drainage network system - as the site is affected by a 100 year ARI flood event, it should be ensured that necessary flood proofing works are considered - consideration be given to an alternate stormwater capture device that requires less maintenance and is less disruptive to traffic - rainwater tanks should not be relied upon for water quality or water quantity control	Key issues raised relate to traffic, parking, built form, stormwater and developer contributions. Refer to the department's assessment of key issues at section 4.2 and the applicant's RtS at Appendix A.
NSW Rural	no objections raised	Tag A – recommended

Fire Service (RFS)	general comments and recommended conditions provided	conditions
Roads and Maritime Services (RMS)	- general comments provided - clarification required regarding the duration of Appin Road temporary construction access - master plan recommended to address longer term development of Campbelltown Hospital - recommended Transport for NSW be consulted to investigate the implementation of a shuttle bus service from the train station and/or town centre - ensure pedestrian safety and connectivity is maintained within and outside the hospital pedestrian network - recommended conditions also provided	Refer section 4.2.2 of the department's assessment on traffic and transport and the applicant's RtS at Appendix A.
Sydney Water	- no objections raised - general comments and recommended conditions provided	Tag A – recommended conditions

3.3 Public Submissions

Two submissions were received from the public, one objecting and one that did not object but raised concerns. The key issues raised in public submissions are summarised in Table 6.

Table 6: Public Submissions

Sub.	Comments	Department Comment
1.	- strongly object to any more developments in the health precinct until the car parking problem in Park Central is addressed - local resident parking has deteriorated due to increases in demand from health employees, patients and visitors	Key concerns raised relate to parking. Refer to the department's assessment of key issues at section 4.2.2.
2.	- concerns are raised regarding the common boundary treatment and screening between the existing seniors living/aged persons care centre and the proposed new car park and access road along the common boundary - significant concerns are raised that this aspect of the proposed development may result in a loss of residential privacy and amenity for the existing seniors living/aged persons care centre	Key concerns raised relate to parking and amenity impacts. Refer to the department's assessment of key issues at section 4.2.2 and 4.2.4.

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

3.4 Applicant's Response to Submissions

JBA Planning, on behalf of Health Infrastructure, has provided a response to the issues raised in a Response to Submissions report (RtS), dated 20 July 2012. The applicant's response was reviewed by council, which expressed disappointment with the applicant's failure to satisfactorily respond to, or address, all of the matters raised by council.

Council advised that without necessary upgrades to surrounding road and drainage infrastructure surrounding the project, the expansion of the hospital will have a direct and significant adverse impact on the surrounding road network and amenity of the Park Central area.

Further correspondence provided by the applicant, dated 25 September 2012, seeks to address council's continued concerns reiterated within its submission on the applicant's RtS. The applicant advises that matters surrounding traffic and car parking were further discussed during meetings held between the applicant and council.

Following further consultation between the department and council, recommended conditions were provided by council for the department's consideration that would address the concerns previously expressed. Council's key issues and concerns, including the recommended conditions, are discussed in Section 4 of this report.

4. ASSESSMENT

4.1 Section 79C Evaluation

Table 7 identifies the matters for consideration under s. 79C that apply to State significant development, in accordance with s. 89H of the EP&A Act. The table also represents a summary for which additional information and consideration is provided for in Section 4 (Key and Other Issues) and relevant appendices or other sections of this report and the EIS, referenced in the table. The EIS has been prepared by the proponent to consider these matters and those required to be considered in the DGRs and in accordance with the requirements of s. 78(8A) of the EP&A Act and Schedule 2 of the Regulation.

Table 7: s79C(1) Matters for Consideration

s. 79C(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Satisfactorily complies. Consideration of relevant EPI's has been undertaken at Section 2.4 of this report. See also Appendix B
(a)(ii) any proposed instrument	Not applicable.
(a)(iii) any development control plan	Clause 11 of State Environmental Planning Policy (State and Regional Development) 2011 provides that development control plans do not apply to SSD. Notwithstanding, consideration of relevant controls has been given at Appendix B.
(a)(iia) any planning agreement	Developer contributions were raised as a key issue by council. Consideration of the matter has been given at Section 4.2.
(a)(iv) the regulations	The development application satisfactorily meets the relevant requirements of the Regulation, including the procedures relating to development applications (Part 6 of the Regulations), public participation procedures for SSD's and schedule 2 of the Regulation relating to environmental impact statements.
(a)(v) any coastal zone management plan	Not applicable.
(b) the likely impacts of that development	Satisfactorily complies. See Section 4.2 of this report
(c) the suitability of the site for the development	See Table 3 at Appendix B
(d) any submissions	Consideration has been given to submissions received during the exhibition of the development application. See Tables 4 and 5. Key issues raised include: built form and urban design; traffic and transport; stormwater; residential amenity; and developer contributions.
(e) the public interest.	Refer to Conclusion
Biodiversity values exempt if:	
(a) On biodiversity certified land?	Not applicable
(b) Biobanking Statement exists?	Not applicable

4.2 Key and Other Issues

The department considers the key environmental issues for the application to be:

- built form and urban design
- traffic and transport
- infrastructure upgrades
- residential amenity
- developer contributions.

4.2.1 Built form and urban design

Concerns were initially raised by the department and council about the design and appearance of the proposed six storey AHS building, specifically the large empty void spaces at lower floor levels, lack of street level activation and large bulky nature of the projected stairwells.

The applicant advises the floor to ceiling height of the lower levels would not permit clinical services operations, only management and administration hospital functions. However, the applicant states that no additional hospital administration functions are currently proposed. It is possible that the void spaces would be suitable and capable of providing future ancillary retail uses.

In the absence of an ancillary retail use being proposed, the applicant has proposed an interim façade design solution at the interface with Parkside Crescent. This has been achieved through the provision of infill stone gabion wall panels, which can be easily removed and recycled in the future should retail/hospital administration functions be established within the lower floor levels. Landscaping along the street frontage will be integrated with the proposed gabion wall treatment, which will provide a positive design response to the character of the open space opposite (see Figures 4 and 5). A condition is recommended to be imposed to ensure that landscape screening is provided to the gabion walls to ensure they address the public domain satisfactorily.

Figure 4: Parkside Crescent (North West) Elevation – Gabion Wall Infill/Landscaping

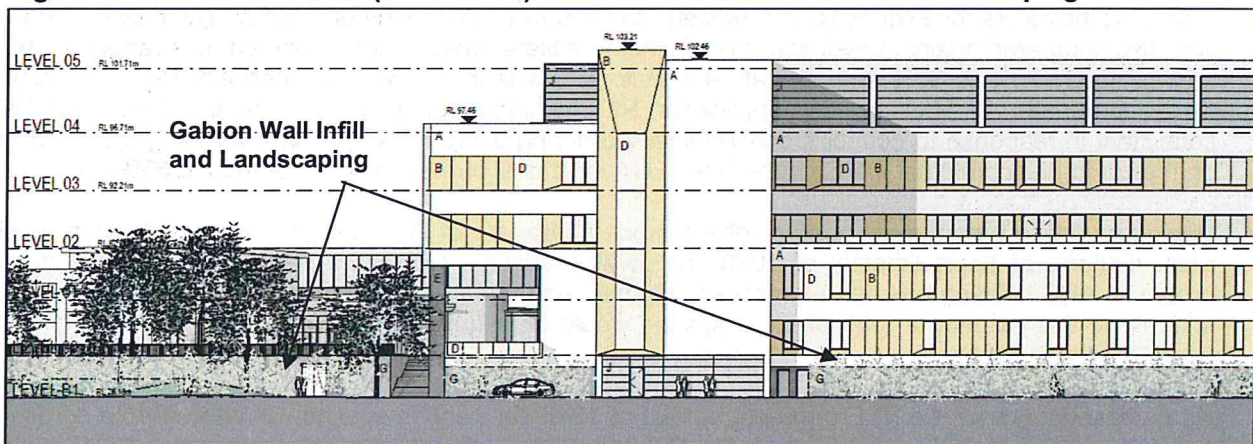


Figure 5: Gabion Wall – Applicant's Precedent Image



The applicant also amended the landscape and public domain design of the new forecourt that interfaces with Parkside Crescent, re-grading the proposed levels to reduce the height and length of the retaining walls, while also making provision for additional pedestrian access directly from street level to the proposed drop-off zone/main entry. The amended design treatment will satisfactorily reduce the visual impact of the proposed retaining wall and provide improved pedestrian access.

The applicant has also made minor amendments to the building design to provide improvements to the façade treatment that better responds to Parkside Crescent, including the provision of new window frame elements that add articulation and visual interest to the building façades. In particular, the stairwell design incorporates the new window design to break up the bulk of the projected structure, to create a less bulky appearance within the streetscape. Notwithstanding, the department and council believe additional

treatment to the façade design will improve the visual interest of the proposed AHS building. Accordingly, a condition is recommended requiring further details to be submitted by the applicant prior to the commencement of works, detailing improved design finishes to the façades of the building.

The department considers that, in satisfying recommended conditions, the built form and urban design of the proposed AHS building and new entry forecourt, as amended by the RtS, will satisfactorily respond to the existing setting and character of the locality. The proposed new landscaped forecourt entry appropriately treats the large embankment fronting the street to create a sympathetic environment that compliments the open space opposite. Further the bulk and scale of the proposed AHS building is considered to be consistent with the existing scale of the hospital and nearby four to five storey Campbelltown Private Hospital.

4.2.2 Traffic and transport

Concerns were raised by council and local residents about the impact of the proposed development on existing on-street parking provisions, traffic congestion and the assessment undertaken within the applicant's Traffic and Parking Report (TPR), specifically the estimated existing and future parking demand and consideration of Parkside Crescent. Further, council also noted that the applicant's reliance on the approved REF in addressing council's traffic concerns was inadequate in terms of justifying the proposed AHS development.

The applicant's TPR adopts a private vehicle use mode share rate of 79%, based on the Regional Transport Indicators for Sydney for the western and south-western parts of Sydney. The mode share rate was also compared against travel patterns of other hospitals, where it was found car use ranged between approximately 76% to 85% among staff and visitors. It was therefore concluded that the adopted 79% was appropriate. In addition, the applicant's RtS included supplementary details from their traffic consultant in response to council's concerns raised during exhibition of the EIS, advising that ABS data on the community profile of the Campbelltown LGA indicates journey to work car trips at 65%.

Having regard to the adopted private vehicle mode share rate of 79%, the existing hospital generates a peak demand of approximately of 1070 car parking spaces. Using the same mode share rate, the proposed AHS building has been assessed as generating the requirement for approximately 150 parking spaces. In this respect, a total of 1220 spaces would be required at the completion of stage 1 of the hospital's redevelopment.

As a consequence of the REF approval, a total of 1240 car parking spaces will be available across the hospital campus, including provision for the 150 parking spaces generated by the proposed AHS building in the new 248 space at-grade car park approved under the REF. In this regard, the department recommends a condition requiring that a minimum 150 of the approved REF car parking spaces be provided for the proposed AHS building prior to the commencement of its use and during on-going operation.

Notwithstanding, concern is still held by council that the parking demand of the existing hospital functions has been under-assessed and that despite the 248 new parking spaces approved under the REF, there will still be a shortfall of parking for the overall hospital campus when completely operational. The department holds similar concerns and as such, it is recommended that an additional overflow car parking area, with a minimum capacity of 100 spaces, be provided to account for the potential future shortfall in parking spaces.

Having regard to the above, the department is satisfied that, in conjunction with the requirement to construct a 100 space overflow car park and parking approved under the REF, parking demand generated by the proposed AHS building and the future operation of the entire hospital campus will be adequately catered for, and that the parking capacity concerns raised by both council and general public have been adequately addressed.

Council also advises that during discussions with the applicant in relation to the proposed REF early works, the principle of encouraging staff and the majority of visitors to leave the site via the internal road network and out through Central Road (not Parkside Crescent) was discussed and agreed upon. In this regard, council believes that one-way aisles should be included within the REF car park to prevent vehicles from exiting via Parkside Crescent. Council is of the opinion that Parkside Crescent should not be regarded as an alternative vehicle access point to the hospital due to its narrow width, high on-street parking demand and road geometry, which reduces the driveability of the road.

Council is concerned that the current approved REF design, providing direct vehicle access to and from Parkside Crescent, will create a significant adverse impact on the existing road network unless necessary road widening and/or additional parking facilities are provided as part of the proposed development.

The traffic assessment undertaken as part of the REF early works approval detailed that the Parkside Crescent vehicle access to the at-grade car park would operate at a good level of service, with a one car space queue length for turning vehicles. Further, it was noted that the approved REF early works would not result in a change to the level of hospital functions or services provided, and therefore would not impact on traffic generation for the area.

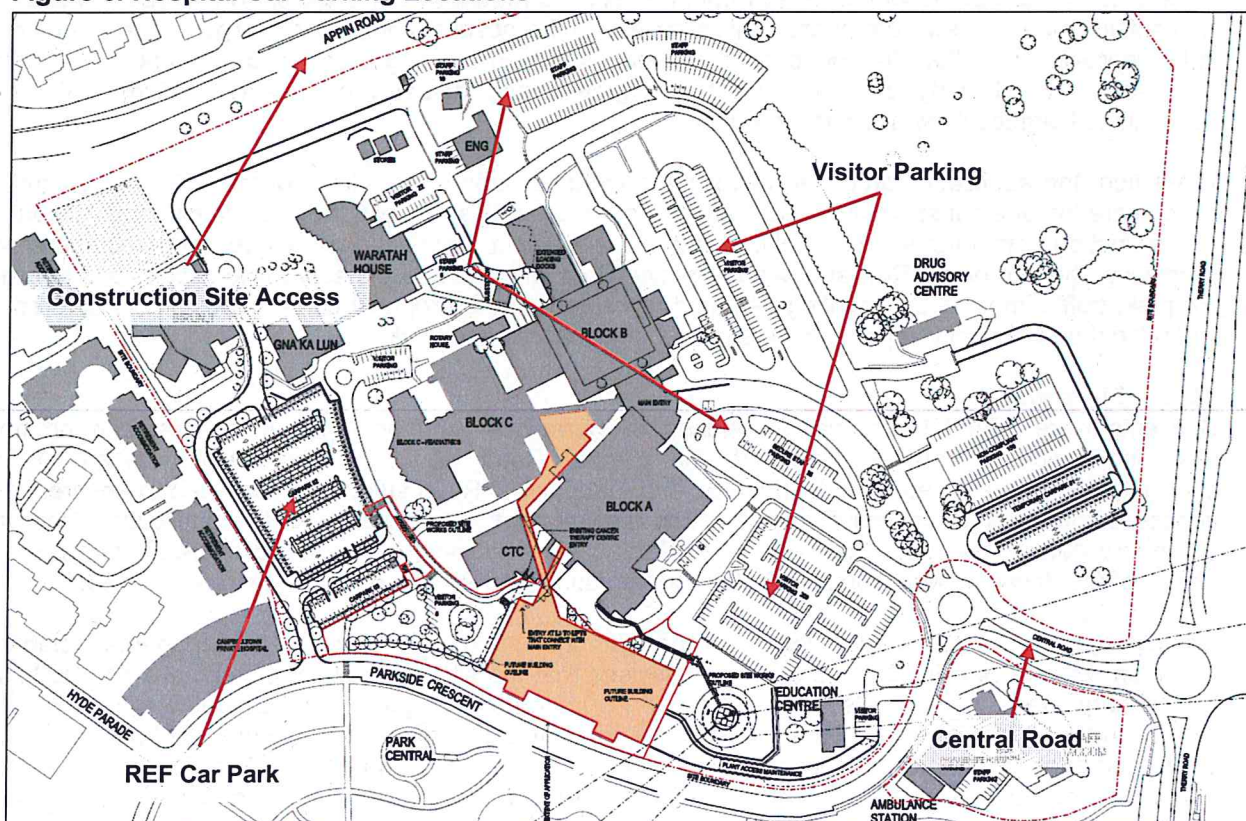
Notwithstanding, the department acknowledges that the proposed development seeks to rely on the REF approved vehicle access point and associated at-grade car parking and must be satisfied that the traffic generation associated with the proposed development will not adversely impact on the existing operation of Parkside Crescent.

The applicant's traffic consultant has advised that the main hospital entrance is, and will continue to be, via Central Road, with the Parkside Crescent access to be used generally by staff accessing the western side of the hospital campus. In addition, the existing design characteristics of Parkside Crescent encourage a low speed vehicular environment and make it less attractive for higher vehicle use, and that the introduction of a low speed zone could further encourage and develop such an environment.

The TPR predicted that the proposed development would generate an additional 203 vehicles per hour (vph). Taking into consideration that not all vehicle movements generated would be in the same direction, using a 70% arrival or departure rate during a peak hour results in approximately 140 vph in one direction. Parkside Crescent was previously assessed as having a road capacity level of service ranging between 'A' and 'B', with 'A' representing the best operating conditions and 'F' representing the worst.

Taking into consideration the additional 140 vph generated by the proposed development, the road capacity of Parkside Crescent would be maintained at a satisfactory operating capacity between 'B' and 'C'. The existing intersections surrounding the proposed development were also assessed as having ample capacity to accommodate the additional traffic generated by the proposal, and would continue to operate at a satisfactory level of service of 'A'.

Figure 6: Hospital Car Parking Locations



The department also notes that a significant amount of hospital visitor parking, and the majority of existing car parking provided, is located off the main Central Road access point, adjacent to the existing main entrance of the hospital (see Figure 6), further encouraging the use of Central Road as the main access point. In addition, correspondence was received from the applicant following meetings held with council, advising that Health Infrastructure is happy to continue to work with council and RMS to explore future access options to the hospital campus to help disperse and manage traffic flows.

In this regard, having considered council's continued concerns regarding the proposed increased use and existing capacity of Parkside Crescent and its ability to continue operation at a satisfactory level of service, the department considers investigations into the establishment of new permanent vehicular access off Appin Road should be explored. In this respect, temporary construction vehicle access has already been approved by the RMS, providing construction vehicle access directly from Appin Road. Accordingly, a condition is recommended requiring new vehicle access to the hospital campus be provided via Appin Road for emergency vehicles in the first instance and then, staff and visitor vehicles. Notwithstanding, the establishment of new permanent vehicle access from Appin Road is dependent on the support and separate approval of the RMS.

In acknowledging the envisaged population growth of the Campbelltown-Macarthur Region and increased demand on health services, the applicant's TPR suggests a number of strategies for implementation or further investigation, including:

- incentive schemes among staff e.g. subsidised bus tickets
- negotiation with bus services to provide frequent bus service between the hospital and city centre/shopping areas
- implementation of a shuttle bus between the train station and hospital
- promotion of benefits associated with walking and cycling and provision of improved services and amenities to encourage both alternate transport modes.

In response to council's comments regarding consideration for plant and maintenance access, the applicant proposed an amendment to the design within the RtS, proposing a dedicated plant and maintenance vehicle access point from Parkside Crescent via a new vehicle cross over and turning bay.

Having regard to the traffic and transport assessment undertaken, including the recommended future strategies, the department considers that the additional traffic generated by the proposed stage 1 redevelopment can be accommodated within the existing road network. Furthermore, investigations into the establishment of new permanent vehicle access to the hospital campus from Appin Road, subject to RMS approval, will allow for the capacity demands of the existing local road network to be better distributed, and similarly cater for the future growth and demand on health services within the surrounding Campbelltown-Macarthur region.

In addition, the applicant's proposed mitigation measures adopt the findings of the TPR and commit to the preparation of a construction traffic management plan. In this respect, the department is satisfied that, in conjunction with further investigations into a new Appin Road vehicle access and recommended conditions, the use of the REF approved Parkside Crescent and associated vehicle access and at-grade car park, traffic impacts and parking demand generated by the proposal can be satisfactorily catered for and will not detrimentally impact on the surrounding local road network.

4.2.3 Stormwater

Concerns were raised by council in relation to stormwater and flooding, noting that existing flood modelling indicates Parkside Crescent and Central Road would be inundated by overland flow floodwaters during a 5 year ARI flood event, and that Central Road should be upgraded to ensure viable access is maintained. Council also noted that the information provided with the application lacks the necessary details to assess flooding impacts and that in addition to a detailed hydraulic analysis, the design of the development should consider flood proofing works in accordance with council's DCP.

Having regard to the works approved under the REF, it is noted that a stormwater management plan was prepared, within which indicates that council advised that the site was not affected by the 1% AEP flood from Birunji Creek. Council also advised it had no information regarding the probable maximum flood (PMF) and no intentions to model the PMF to determine the extent of flooding. In the REF, it was concluded that given the sites elevation relative to the elevation of Birunji Creek and the existing topography of the area, that the hospital site would not be impacted by a PMF flood event.

The stormwater management plan notes that council advised that the site is affected by the 1% AEP overland flow event from the local Appin Road catchment that traverses the hospital campus. The works approved under the REF propose the construction and augmentation of stormwater drainage intercept and pipe flows up to the 5% AEP event, with excess stormwater carried within existing roadways via overland flow paths, considered to be standard engineering practice.

The applicant notes that in the hospital campus' early works approved under the REF, flood data and drainage capacities were assessed to determine the appropriate design response and were referred to council for its review. Also provision was made to allow for the appropriate expansion of stormwater drainage infrastructure to cater for the future envisaged campus redevelopment.

The department notes that civil engineering and services infrastructure works, including stormwater drainage and services infrastructure for the proposed AHS building, were approved under the REF in January 2012, and do not form part of the proposed SSD application.

Notwithstanding, correspondence was received from the applicant during the assessment of the subject SSD application, dated 25 September 2012, detailing that from meetings held with council, it believed council's main concern to be impacts associated with stormwater overland flows over Central Road, near the Therry Road intersection and the capacity constraints of the existing stormwater pipe infrastructure in this location. However, no reply or confirmation of this fact had been provided following further consultation undertaken with council.

The department notes that the proposed siting of the AHS building is located down stream from the Therry Road and Central Road intersection and the development would not impact or affect any drainage, overland flow or flooding currently experienced in the locality.

The applicant also advised that it had been agreed that quarterly meetings between Campbelltown Hospital and council would be held at an executive level. Furthermore, council would be included in regular reporting, with the aim of improving information sharing and the resolution of emerging issues that affect both council and the development and operation of the hospital.

The department is satisfied that stormwater infrastructure approved under the REF will satisfactorily cater for the proposed AHS building and that the agreed future consultation between affected parties will ensure that suitable resolutions can be found to any future issues that arise.

4.2.4 Residential amenity

Concerns raised by the adjacent seniors living complex relate to the impact of the 155 space car park and access road approved under the REF adjacent to the complex's boundary.

Notwithstanding, the current outlook of existing seniors living residents toward the hospital campus is of unformalised over-flow car parking, a curved internal access road and large, unlandscaped grassed areas. In this respect, the construction of formalised car parking and associated internal access road is not considered to detract from the existing outlook of residents.

The proposed AHS development itself will have minimal impacts on the surrounding built environment. The acoustic assessment report submitted with the development application confirms that the implementation of appropriate measures will ensure that noise emissions from the development will be limited.

4.2.5 Developer contributions

Council's submission made during the exhibition of the development application advises that the exemption sought from the Campbelltown City Council Section 94A Levy Development Contributions Plan is not supported and a contribution of \$1,082,684.25 would be payable, calculated based on 1% of the cost of development works.

Works identified within Council's 94A levy contributions plan works schedule will be funded through s94A levies to cater for the future growth and development of the LGA. Specifically, the works schedule identifies only roads, intersections, traffic facilities and car parking as being funded by s94A levies, with intersection upgrades to Gilchrist Road and Therry Road the closest identified works.

The proponent has argued that the proposed development will provide an important public service for the Campbelltown/Macarthur centre and South Western Sydney region. Further, they note that the proposed

development satisfies the department's existing Circular D6 – Crown Development Applications and Conditions of Consent, and that an exemption is appropriate based on the following grounds:

- levying of contributions on projects for health purposes for local services will not have any direct nexus to the development
- the payment of contributions to facilities elsewhere would consume resources which should be devoted to the hospitals core infrastructure upgrade and social benefits that would result in such a development
- circular D6 provides a matrix that states health facilities do not require offset contributions to upgrade local roads, only works associated with the site entrance.

Having regard to the positions presented by both council and the applicant, the department is of the opinion that the proposed development will provide a much needed and valued public service for the local and regional community. The development of the AHS building will lead to future benefits for the public in terms of employment opportunities and the provision of essential community services and associated infrastructure, in the form of acute health services. In this respect, the department does not agree with council's position and considers that the applicant should be exempt from the requirement to make monetary contributions under council's existing s94A contributions plan.

5. CONCLUSION AND RECOMMENDATION

5.1 Conclusion

The proposed stage 1 redevelopment of Campbelltown Hospital, comprising the construction of a new acute health services building and associated covered walkway link, patient drop-off and landscaped entry will significantly benefit the local and regional community through the provision of increased and improved health services. The proposed development will also provide for an improved outlook of the hospital site from Marsden Park.

The proposed development is consistent with key objectives of State, local and regional planning strategies, and represents an increased investment in infrastructure that would provide for improved health services and increased employment opportunities. The proposed improvements and clustering of health infrastructure will also strengthen the importance and function of the locality, supporting the growth and development of Campbelltown-Macarthur as a regional city. In this regard, the department considers the infrastructure, health and employment benefits generated by the proposed development to be in the public's interest.

The department is satisfied that the proposed development, as amended by the Response to Submissions, satisfactorily responds to the issues raised and recommends that the SSD application for the proposed stage 1 redevelopment of Campbelltown Hospital be approved. The department's recommended conditions of approval will ensure that the construction and future operation of the proposed facility will maintain the environmental and residential amenity of the surrounding environment and more specifically, ensure that adequate car parking is provided for within the at-grade car park approved by the REF.

5.2 Recommendation

In accordance with s. 89E of the *Environmental Planning and Assessment Act, 1979*, it is recommended that the Executive Director, Major Projects Assessment:

- (a) considers the recommendations of this report for the stage 1 redevelopment at Campbelltown Hospital (SSD 5003)
- (b) **approves** the State significant development Application, as outlined in the Environmental Impact Statement prepared by JBA Planning, dated March 2012, as amended by the Response to Submissions report prepared by JBA Planning, dated July 2012 and subject to conditions of approval set out in the attached instrument at **TAG A**, under section 89E of the *Environmental Planning and Assessment Act 1979*
- (c) **signs** the attached development consent at **TAG A**.



Director
Metropolitan and Regional Projects North

14/11/12

Executive Director
Major Projects Assessment

APPENDIX A RELEVANT SUPPORTING INFORMATION

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

1. Environmental Assessment

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5003

2. Submissions

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5003

3. Proponent's Response to Submissions

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5003

APPENDIX B CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENT(S) (INCLUDING DRAFT) AND DCP(S)

State Environmental Planning Policy (State and Regional Development) 2011

The aims of this SEPP are to identify State significant development and State significant infrastructure and provide the necessary functions to joint regional planning panels to determine development applications.

The proposal is for SSD in accordance with s. 89C of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it is development for the purpose of a hospital with a capital investment value (CIV) in excess of \$30 million, under clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011.

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

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

The proposed stage 1 redevelopment consists largely of the proposed AHS building and does not result in a change to the type or quantities of dangerous goods currently found on site. The applicant's Waste Management Plan submitted, advises that the majority of these substances are stored within small containers that are not near or do not exceed the SEPP 33 identified thresholds. In this respect, given that the proposed development does not introduce or increase the quantities of these existing substances, SEPP 33 is not triggered and does not require the preparation of a preliminary hazard analysis assessment.

State Environmental Planning Policy No.55 – Remediation of Land

SEPP 55 aims to provide a state wide approach to the remediation of contaminated land. In particular, SEPP 55 aims to promote the remediation of contaminated land to reduce the risk of harm to human health and the environment by specifying under what circumstances consent is required, specifying certain considerations for consent to carry out remediation work and requiring that remediation works undertaken meet certain standards.

A phase 1 Environmental Site Assessment (phase 1 assessment) and summary report of a phase 2 Contamination Assessment (phase 2 assessment), undertaken for the entire hospital campus (inclusive of the stage 1 AHS building site), were submitted by the applicant to support the proposed development of the subject site.

The phase 1 assessment found evidence of areas of environment concern (AECs) in the form of fill material and an underground petroleum storage system (UPSS) within the site boundary of the proposed AHS building. The phase 2 assessment undertaken, based on the results of the phase 1

assessment, with further borehole drilling and sample testing undertaken. Concentrations of potential contaminants were found to be below their laboratory detection limits and site assessment criteria. Further, asbestos was not detected in samples analysed or observed during investigation. From the findings of the phase 2 assessment, it was deemed that no further investigations for contamination were necessary.

Accordingly the department is satisfied that the applicant has demonstrated, through the phase 1 and 2 assessments undertaken over the stage 1 redevelopment site, that the concentration of potential contaminants are below their respective thresholds and that the subject site is considered suitable for the proposed development.

State Environmental Planning Policy (Infrastructure) 2007

The aim of the Infrastructure SEPP is to facilitate the effective state wide delivery of infrastructure by providing greater flexibility in the location of infrastructure and service facilities, allowing the development of surplus government land, identifying relevant environmental assessment categories for development and relevant matters to be considered and providing for consultation with relevant public authorities.

In accordance with Schedule 3 of the Infrastructure SEPP, clause 104 Traffic-generating development applies to the proposed development. In this regard and in accordance with cl. 104(3) of the Infrastructure SEPP, the Roads and Maritime Services were given written notice of the SSD application and due consideration was given to their comments received. Refer to section 3.2 of this report.

Further, as detailed in Section 1.4 of this report, a program of early works was approved under Part 5 of the EP&A Act, relying on Divisions 10 and 17 of the Infrastructure SEPP.

Planning for Bushfire Protection 2006

The proposed development is identified as being located within the 100 m vegetation buffer zone of a category 1 bushfire zone located southwest of its proposed siting and is defined as a 'Special Fire Protection Purpose' development under s. 91 of the EP&A Act and s. 100B of the Rural Fires Act 1997, requiring a Bushfire Safety Authority (BSA) from the RFS.

The proposed SSD application was accompanied by a Bushfire Protection Assessment, which undertook a detailed bushfire threat assessment under the various legislation and guidelines. Recommended construction standards, water, gas and electricity supply requirements and access requirements are provided, including the establishment of a 30 m asset protection zone (APZ) to the north western side of the proposed development.

The application was referred to the RFS for review and comment. In response, RFS raised no objections and provided recommended conditions, requiring the establishment of an APZ and construction standards to ensure that a threat from a bushfire is minimised.

The department is satisfied that the proposed development and recommended bushfire protection measures will provide an adequate standard of bushfire protection required for the AHS building and ensure that the health and safety of its occupants will be maintained in the event of bushfire.

Campbelltown (Urban Area) Local Environmental Plan 2002

The aim of the Campbelltown LEP is to provide controls on development in the urban area of Campbelltown local government area and promote the objectives of the EP&A Act to maintain and enhance the amenity area of Campbelltown's urban areas. Consideration of the relevant clauses of the LEP is provided in Table 1.

Table 1: Consideration of Campbelltown LEP

Campbelltown (Urban Areas LEP) 2002	Criteria	Department Assessment	Comment / Complies
Clause 28 – Zone 10 (a) – Regional Comprehensive	Provide land for the regions largest centre of commerce, to encourage employment and economic growth,	The proposed development is for the purposes of a new hospital facility and ancillary	Yes

Centre Zone	to accommodate tertiary education, hospital facilities, cultural and entertainment facilities and encourage new forms of accessible higher density housing.	works.	
Clause 42A – Bushfire hazard	Consideration of bushfire control and fuel management strategies, the development's contribution to threat significance, increased demand for emergency services, mitigation measures and consideration of Planning for Bush Fire Protection.	The department has given consideration to the bushfire hazard potential and is satisfied with the recommended bushfire protection measures presented within the submitted Bushfire Protection Assessment report and RFS conditions.	Yes

Campbelltown (Sustainable City) Development Control Plan

It is noted that clause 11 of State Environmental Planning Policy (State and Regional Development) 2011 provides that development control plans do not apply to SSD. Notwithstanding, consideration of relevant controls has been given in Table 2.

Table 2: Consideration of Campbelltown DCP

DCP	Department Comment / Assessment	Complies
Clause 2.2 – Site Analysis	Site analysis plan submitted with the SSD application satisfactorily meets the requirements listed under clause 2.2.	Yes
Clause 2.3 – Views and Vistas	The proposed development responds appropriately to its setting and will not detrimentally impact on existing views and vistas. The setting of the proposal will create new views across Marsden Park, the existing open space area adjacent to the west.	Yes
Clause 2.4 – Sustainable Building Design	The architectural design of the proposed development seeks to maximise natural daylight and minimise glare, whilst aiming to achieve an equivalent 4 star Green Star building sustainability rating through the use of energy efficient electrical services, use of energy efficient mechanical services and equipment and energy efficient hydraulic water fittings.	Yes
Yes Clause 2.5 – Landscaping	The proposed landscape design enhances the visual character of the proposed development, complementing the landscaped features of Marsden Park and while providing a sympathetic treatment to the Parkside Crescent façade.	Yes
Clause 2.6 – Flora, Fauna and Weed Management	The development site is generally clear of any significant vegetation. The applicant's flora and fauna report submitted with their SSD application concludes that there will be no impact to threatened or endangered species.	Yes
Clause 2.7 – Erosion and Sediment Control	An erosion and sediment control plan prepared as part of the approved REF works is included as part of the SSD application.	Yes
Clause 2.8 – Cut, Fill and Floor Levels	No fill is proposed as part of the stage 1 redevelopment, while cut and fill involved with the proposal is to be minimised. It is acknowledged that the development will involve the excavation to the site to accommodate the proposed AHS building, however, the design outcome proposed will enable improved activation Parkside Crescent by future opportunities for uses and functions within the lower floor levels of the building. Further the proposed excavation will appropriately treat the existing large earth mound and provide an improved design outcome.	Yes

Clause 2.10 – Water Cycle Management	Drainage and stormwater control has been previously approved under the early works REF, which took into consideration the design and siting of the proposed AHS building. Additional, a Water Management Plan has also been prepared by the applicant.	Yes
Clause 2.11 – Heritage Conservation	A heritage assessment was undertaken and submitted with the SSD application as part of the Aboriginal and cultural heritage assessment report prepared. It was concluded that due to the site's history and high level of development disturbance, it was determined that there was minimal potential for aboriginal or non-Aboriginal archaeology heritage to be present. Recommendations have been included within the applicant's proposed mitigation measures.	Yes
Clause 13 – Security	The design of the proposed development has taken into consideration the key principles of crime prevention through environmental design. Whilst the lower floor levels fronting Parkside Crescent lack activation, suitable landscaping is proposed to ensure territorial reinforcement is achieved and provide suitable access control. The design of the lower floor levels also provides for future opportunities for the introduction of additional land use functions at the street level, such as café/retail, which would assist in activating the space.	Yes
Clause 14 – Risk Management	The applicant's SSD application has satisfactorily addressed risk management through the preparation of phase 1 and 2 environmental assessments in accordance with SEPP55, undertaken a review of the development against SEPP33 and assessed and designs the development having regard to Planning for Bushfire Protection 2006.	Yes
Clause 2.15 – Waste Management	The SSD application is accompanied by a waste management plan that satisfactorily addresses the waste management procedures proposed to be implemented. The applicant has also given consideration to waste management during construction in the preliminary construction management plan submitted.	Yes

APPENDIX C GLOSSARY

Accredited Assessment under the EPBC Act.

If the project involves a "controlled action" under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), the project can be assessed as an accredited assessment under the EPBC Act. This means that separate assessment processes are not required under both the EPBC Act and the EP&A Act, and the NSW assessment process has been accredited by the Commonwealth. However, the Commonwealth Minister for the Environment maintains an independent approval role, and the Commonwealth provides input to certain stages of the assessment process

Where a controlled action is involved the department has consulted with the Commonwealth Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) throughout the assessment process. The department's assessment of the specified Commonwealth matters is detailed in Sections 2 and 4 of this report.

Ecologically Sustainable Development can be achieved through the implementation of:

- (a) *the precautionary principle - namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by:*
 - (i) *careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and*
 - (ii) *an assessment of the risk-weighted consequences of various options,*
- (b) *inter-generational equity—namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,*
- (c) *conservation of biological diversity and ecological integrity—namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,*
- (d) *improved valuation, pricing and incentive mechanisms—namely, that environmental factors should be included in the valuation of assets and services, such as:*
 - (i) *polluter pays—that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,*
 - (ii) *the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,*
 - (iii) *environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.(Cl.7(4) Schedule 2 of the Regulation)*

Objects of the Act

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

Relevant Environmental Planning Instruments.

These are EPIs that are required to be taken into consideration in the assessment of the project under s. 79C. A detailed evaluation of each is provided at Appendix B.

Section 79C Evaluation

(1) **Matters for consideration—general**

In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

(a) *the provisions of:*

- (i) *any environmental planning instrument, and*
- (ii) *any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*
- (iii) *any development control plan, and*
- (iiia) *any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and*
- (iv) *the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and*
- (v) *any coastal zone management plan (within the meaning of the Coastal Protection Act 1979), that apply to the land to which the development application relates,*
- (b) *the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- (c) *the suitability of the site for the development,*
- (d) *any submissions made in accordance with this Act or the regulations,*
- (e) *the public interest.*

Note. See section 75P (2) (a) for circumstances in which determination of development application to be generally consistent with approved concept plan for a project under Part 3A.

Note. The consent authority is not required to take into consideration the likely impact of the development on biodiversity values if:

- (a) *the development is to be carried out on biodiversity certified land (within the meaning of Part 7AA of the Threatened Species Conservation Act 1995), or*
 - (b) *a biobanking statement has been issued in respect of the development under Part 7A of the Threatened Species Conservation Act 1995.*
-