

13 November 2015

Our Ref: 15-200 (MK)

Ms Carolyn McNally

Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally,

RE: REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS FOR THE CAMDEN MEDICAL CAMPUS PRECINCT, GLEDSDOOD HILLS

In accordance with Clause 3 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), Gregory Hills Development Company (GHDC) requests the issue of Secretary's Environmental Assessment Requirements (SEARs) for the staged redevelopment of the proposed Camden Medical Campus in Gledswood Hills.

The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued.

1. SITE DESCRIPTION

2. Site Context

The site is located within the Gregory Hills Corporate Park (GHCP) within the relatively new greenfields suburb of Gledswood Hills.

Gledswood Hills is located within the local government area (LGA) of Camden and the Macarthur Region of Sydney.

The site is located approximately 70 kilometres south-west of the Sydney Central Business District (CBD), 25 kilometres south-west of Liverpool, 10 kilometres north-east of Camden and 12 kilometres north-west of Campbelltown.

Below is a regional context map of the GHCP showing its location with regard to the Sydney CBD and nearby centres.



Figure 1 Regional Context Map (Source: GHCP)

The site is located within the South Western Sydney Local Health District (SWSLHD).

The SWSLHD provides health care services and support to improve the health of more than 900,000 people living in seven local government areas (LGAs) of South West Sydney and the Southern Highlands. Such healthcare is currently provided through six public hospitals, thirteen major community health centres, a range of smaller community facilities and partnerships with five Affiliated Health Organisations and twenty five non-government organisations¹.

The figure below is a map showing the proximity of the site to other private and public hospitals within the Sydney Metropolitan Area. As can be seen in this figure, the site is strategically located in a clear geographical "void" between established hospitals in the south-west.

¹ http://www.swslhd.nsw.gov.au/pdfs/SWSLHD_Summary_StratPlan.pdf



Figure 2 Proximity of Site to Nearby Hospitals (Source: GHCP)

The figure below shows the location of the site with regard to nearby medical centres.

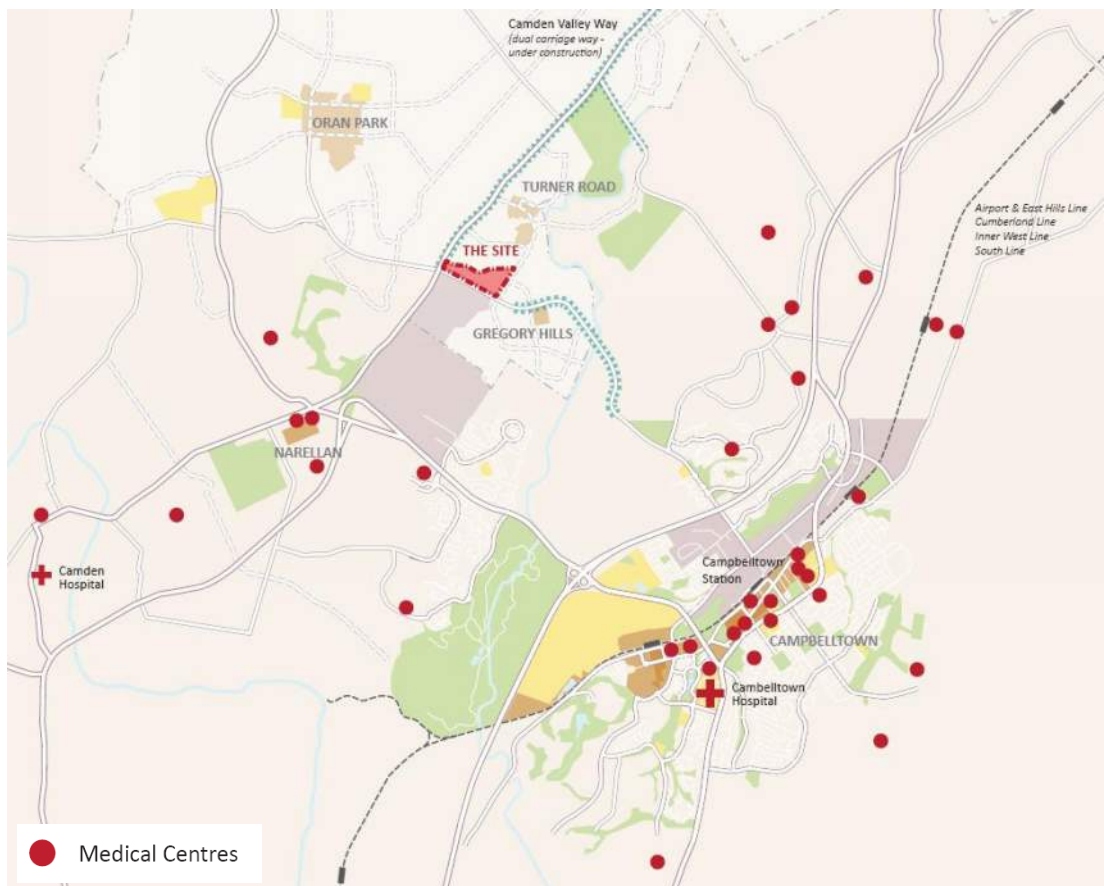


Figure 3 Context Map of Existing Medical Centres (Source: GHCP)

3. Site Description

As noted above, the site is located within the GHCP. The GHCP is a 30 hectare innovative business and large box retail or bulky goods retail park, located at the centre of the South West Growth Corridor. The GHCP is a strategic location, with 20,000 homes now built within 3 kilometres of the site and an addition 90,000 homes planned.

The proposed new medical campus site comprises a total of 4.2 hectares of land within the eastern part of the GHCP.

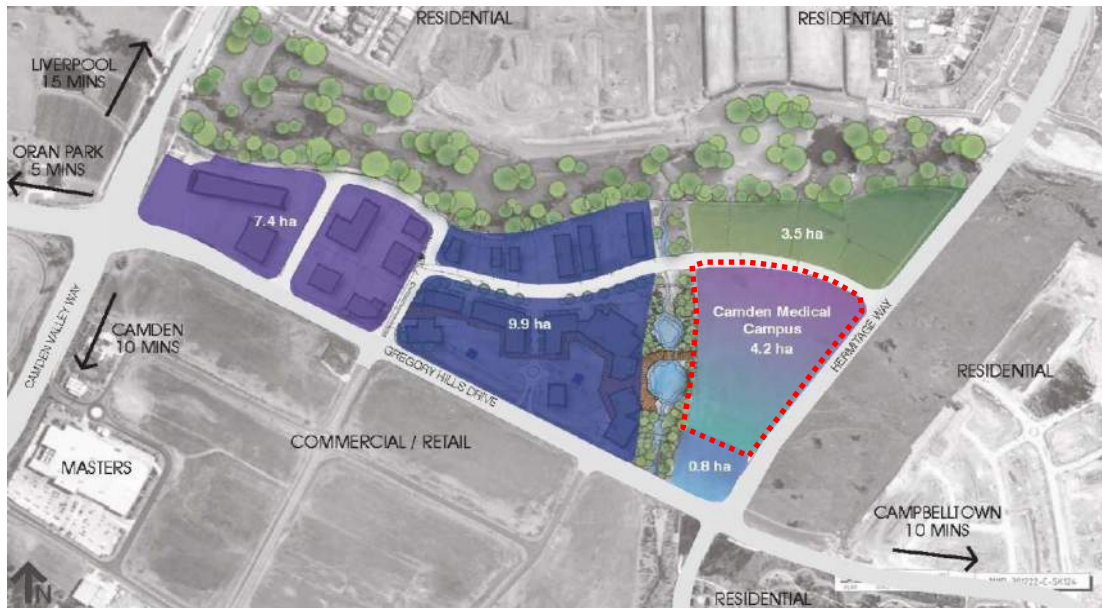


Figure 4 GHCP site plan, with the proposed site outlined in red (Source: HPI)

As can be seen above, the site has two (2) street frontages, to Hermitage Way and Digitara Road. The latter is currently under construction. The site is also characterised as follows:

- The site is under the ownership of GHCP P/L.
- The site is part of a much larger allotment legally described as Lot 8000 in Deposited Plan 1209013;
- The site is irregular in shape with a northern boundary of over 250 metres, southern boundary of over 100 metres, eastern boundary of over 250 metres and western boundary of over 220 metres.
- The site is currently vacant and there is no vegetation on-site.
- The site is not steep nor sloping with a gentle fall of approximately 4 metres towards the west of the site.
- An easement traverses the site along the southern boundary.
- The site abuts a riparian zone to the west and a smaller development lot of 0.8 hectares to the south.

An aerial view of the site is below, showing its location within the wider GHCP.



Figure 5 Aerial plan of the site and surrounds, GHCP outlined in yellow and approximate location of site outlined in red (Source: SIX Maps)

A range of uses are envisaged for the GHCP and surrounding area. The following is the current Masterplan for the GHCP, noting that a DA has already been lodged with Camden Council for a "health hub" (comprising medical consulting suites and ancillary uses) (marked by the purple star), a childcare centre to the north of the health hub (marked by the blue star) and approval has been granted for a mix of bulky goods, highway service retail etc within other lots within the GHCP.

The eastern side of The Hermitage Way, which is adjacent to the GHCP, comprises low density residential dwellings that are currently under construction.



Figure 6 Current Masterplan for the GHCP (Source: GHCP)

4. Relevant Planning History

Staged subdivision approval of the GHCP was granted under DA 277/2012 to create 32 business development lots and 2 residual lots. One of these residual lots is the site of the proposed development. It also included road construction, drainage, riparian works, landscaping and associated site works. This DA has been modified on a number of occasions pursuant to Section 96 of the Act to change the layout of the subdivision as the lots are purchased and developed.

Currently, bulk earthworks are being undertaken on the site to raise the surface level in accordance with the subdivision approval. Further, utilities including sewer, water, electrical and telecommunications are being constructed, with connections to be provided to the site.

5. The Concept Proposal

The proposal for the Camden Medical Precinct consists of a staged development under Section 83B of the EP&A Act.

Approval will be sought under the Stage 1 SSSA for a concept plan for the site for a new private hospital with ancillary services. Approval will be sought under the concept plan for building footprints, envelopes, indicative uses, access, loading, landscaping and parking.

Future stage DA(s) will be lodged to seek approval for the detailed design of the proposed concept.

The staging of the concept is yet to be determined but is likely to comprise either a single or two (2) construction stages.

A sketch of the concept plan and indicative footprints is below.

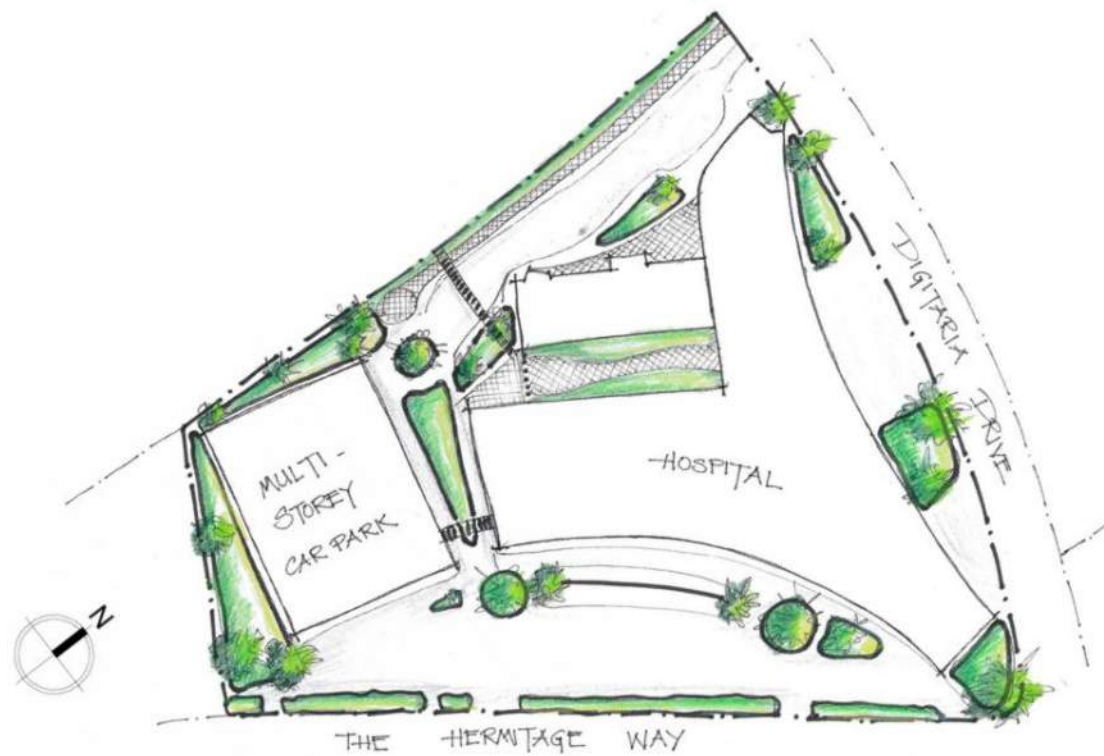


Figure 7 Concept Plan (Source: HPI)

The main hospital building will be constructed in the northern part of the site, with one basement level of parking below for doctors and surgeons. The main hospital building will be up to four (4) storeys and a maximum of 25 metres in height. The main hospital building will be well setback from the street edges and riparian zone, with on-grade parking and buffer landscaping proposed within the setback zone to The Hermitage Way and the adjacent riparian zone.

A new four (4) storey multi-storey carpark is also proposed to the south of the main hospital building. There will be direct pedestrian linkages between the carpark and hospital.

Indicative floor plans are included in the architectural pack prepared by HPI and accompanying this letter.

Whilst approval is only sought for the concept of the development, below are some indicative photomontages of the hospital, noting that the detailed design will be the subject of separate future stage DA(s). They show how the proposed building envelopes can be designed to create a well designed, articulated and modulated built form on the site.



Figure 8 View of the main hospital entrance and drop-off from the south (fronting The Heritage Way)
(Source: HPI)



Figure 9 View of the development from the north-eastern corner of the site (Source: HPI)



Figure 10 View of the development from the adjacent riparian zone to the west (Source: HPI)

Refer to the concept plans prepared by HPI for further detail.

6. Employment

The proposal will provide a wide range of critical private hospital and other medical services, with an estimated employment generation of approximately 800 direct jobs upon completion.

7. Capital Investment Value

The estimated construction cost for the proposed concept is approximately \$236 million. This figure will be confirmed in a detailed Quantity Surveyors Cost Report that will accompany the concept SSDA.

8. Strategic Planning Context

8.1 NSW State Plan

The NSW Premier has recently "re-written" the NSW State Plan to sharpen its focus on a dozen "Premier's priorities". The proposal is consistent with three (3) of these priorities as it will create jobs during construction and the ongoing operation of the hospital; will "create" new "infrastructure"; and will improve access to health-care for the south-western region of Sydney.

In terms of the previous iteration of the State Plan, a key component of the focus on health was to restore confidence in the public health system by rebuilding hospitals and health infrastructure. Through the provision of more private health services and hospitals in Sydney, the burden on the public hospital system will be lessened with a reduction in hospital waiting times. Further, there may be an opportunity to establish a relationship between the private hospital and the public health system through co-ordinated care including *"contracted admitted patient care whereby care is organised and funded by one hospital but provided by another, often private, hospital; co-location of public and private hospitals [services] allows for sharing of facilities, equipment and staff, and "build, own, operate and transfer" arrangements enable private sector financing of the construction of new facilities to treat public patients"* (HPI).

8.2 The State Infrastructure Strategy – "First Things First"

The State Infrastructure Strategy "First Things First" is an assessment of priority infrastructure problems and solutions for the next two decades for the NSW Government, the community, business and all who have an interest in the success of NSW.

The Strategy builds on the NSW Government's existing public commitments and outlines a forward program of more than 70 urban and regional projects and reforms across a range of portfolios including health.

The report indicates that NSW's health system faces growing demand from an ageing population, lifestyle diseases and new care technologies. This will require new models of care, including more beds in smaller, specialist medical facilities and community health centres. As noted above, the proposal will provide greater access to private health care services in the south-western region of Sydney, reducing the burden on the public hospital system.

8.3 A Plan for Growing Sydney

A Plan for Growing Sydney, released in December 2014, is the NSW Government's plan for the future of the Sydney Metropolitan Area over the next 20 years. The Plan provides key directions and actions to guide Sydney's productivity, environmental management, and liveability – including the delivery of housing, employment, infrastructure and open space.

The site is located within the South West Subregion and a designated "Growth Area" as can be seen in the subregion map extract below.

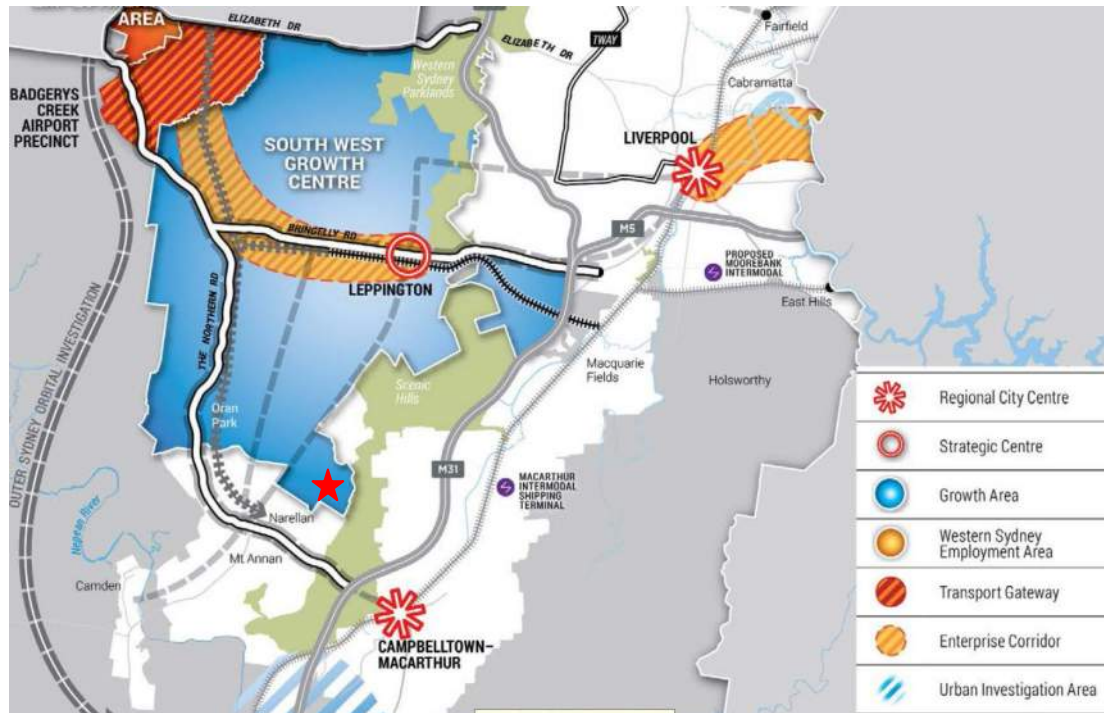


Figure 11 Plan for Growing Sydney map for the South-west, site marked by the red star (Source: DPE)

The proposal is consistent with Direction 1.10 and Action 1.10.3, which promote a focus on the expansion of health facilities to service Sydney's growing population. With the plan identifying the south-west subregion as the fastest growing subregion in Sydney, delivery of new and improved health-care services in the south-west will be paramount to meet increasing demands generated by additional population growth.

The plan also identifies that there is a need to investigate improved access to services and jobs, particularly within the Camden LGA and to support the rapid increase of residential land release.

8.4 Other Strategic Planning Considerations

8.4.1 SWSLHD Strategic & Healthcare Services Plans

The *SWSLHD Strategic & Healthcare Services and Corporate Plan* identifies the following in relation to the capability of healthcare services in the region to meet demands:

"There is insufficient infrastructure in SWSLHD to meet current and future demand, with most hospitals and community health centres already operating at capacity and many running at occupancy rates higher than they were designed for. Although there is progress towards national targets, there are significant waiting times and lists for

Emergency Department care, planned surgery and many specialist medical and community health services. Under current models of care, by 2021 almost 900 additional beds or bed equivalents will be needed to cater for increased demand at benchmark levels of provision. In addition to beds, expansion of imaging, laboratory, theatres, specialist endovascular suites, consultation rooms, office space, education, research and hotel areas is required. Technology updates are needed to enable delivery of more innovative, efficient care. With relatively few hospitals, day procedure centres and specialist services in the private sector in South Western Sydney, the public health system is currently required to meet most of the local demand. A challenge will be to engage with private and not for profit health providers collaboratively to meet increased demand".

Further to the above, the SWSLHD Strategic & Healthcare Services Plan - Strategic Priorities in Health Care Delivery to 2021, states as follows with regard to the importance of private hospitals and the service they provide to the region:

"Private hospitals also have an important role in promoting and preserving the health of the community, and also play an important role in reducing demand on public hospitals. A critical concern in South Western Sydney is that there are fewer private hospitals and other services than in other parts of Sydney. For example, only 4% of private hospital beds and 6.5% of day procedure centres in NSW are located in this District and there are over twice as many private beds in the northern, eastern and southern parts of Sydney compared with western Sydney. This significant gap in private supply together with lower levels of private health insurance in this District, has resulted in poorer use of private hospitals with 27% of care of SWSLHD residents occurring in private hospitals compared with 36% of NSW residents overall. Anecdotally, there are also significant gaps in the number of medical specialists and allied health practitioners working in private practices in this District. The alternatives for the public are therefore to use outpatient services in local public hospitals or travel to other parts of Sydney to access their specialist health care."

The proposed development will contribute towards improving the quantum of private hospital and health services in the South Western Sydney region, reducing the demand on local public health services and the need for residents in the region to travel to other parts of Sydney to access specialist private health care. The proposal will also assist in drawing a range of medical specialists and allied health practitioners to the region.

8.4.2 Western Sydney Priority Growth Area

On 8 October 2015, the NSW Government announced a broader investigation into opportunities for new jobs and homes around the planned Badgerys Creek Airport in Sydney's west.

The new Western Sydney Priority Growth Area (shown in the map below) will guide new infrastructure investment, identify new homes and jobs close to transport, and coordinate services in the area.

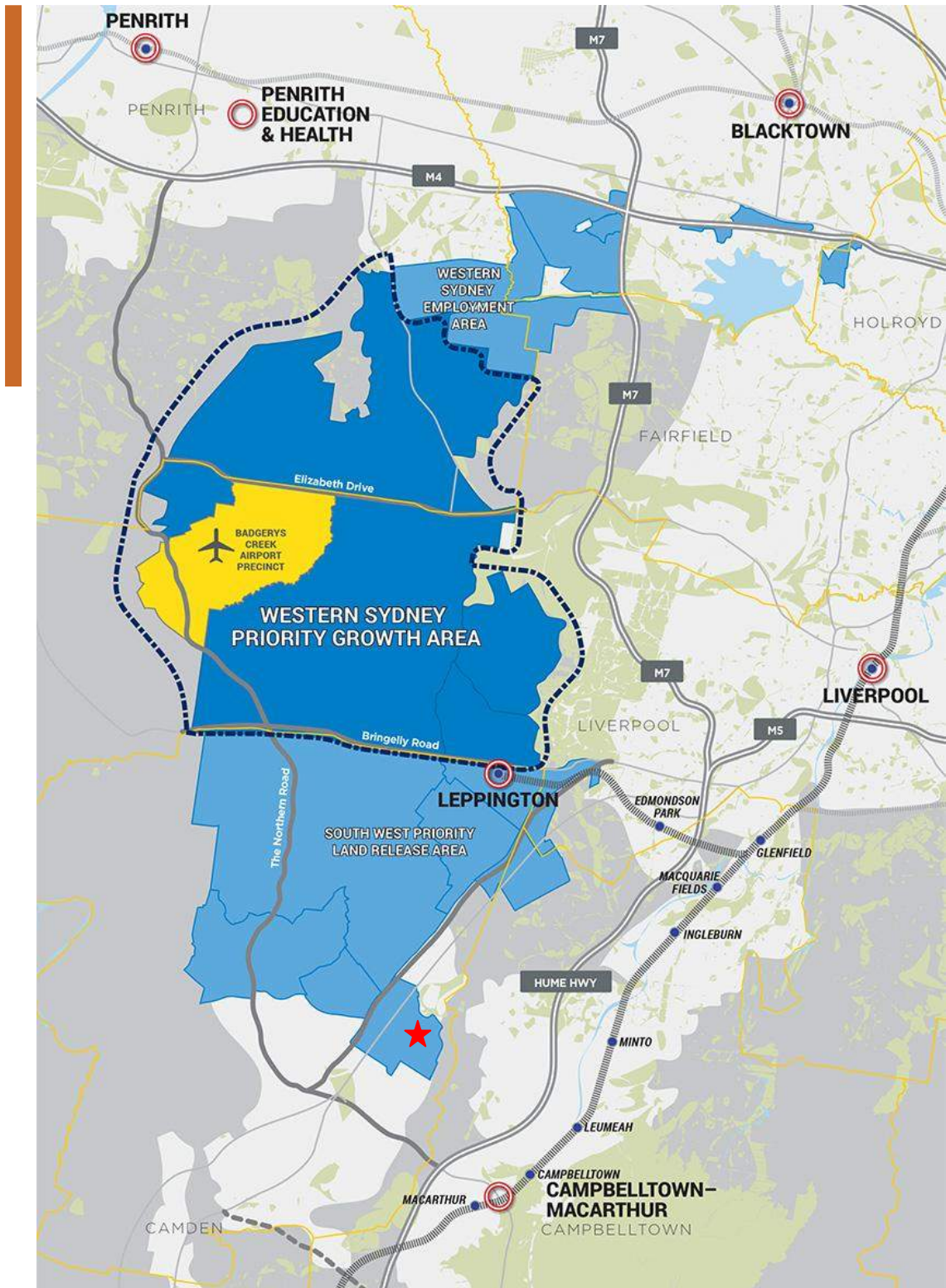


Figure 12 Western Sydney Priority Growth Area, approximate location of site marked by the red star (Source: DPE)

The DPE are currently in the early stages of investigations to determine a strategy for the area, noting that a draft Land Use and Infrastructure Strategy will be prepared to guide new infrastructure investment, identify new homes and jobs close to transport, and coordinate services in the area.

This strategy is not yet available, but we note that the proposal will assist in supporting the growth of the priority area by providing a wide range of critical private hospital and other medical services and generating approximately 800 direct jobs upon completion.

9. Statutory Planning Context

9.1 State Environmental Planning Policy (Sydney Region Growth Centres) 2006

9.1.1 Overview

The Growth Centres SEPP is the primary Environmental Planning Instrument (EPI) that applies to the site.

9.1.2 Land Use Zoning

As can be seen in the figure below, the site is zoned B5 Business Development and is adjacent to land zoned RE2 Private Recreation (to the west) and R1 General Residential (to the east).

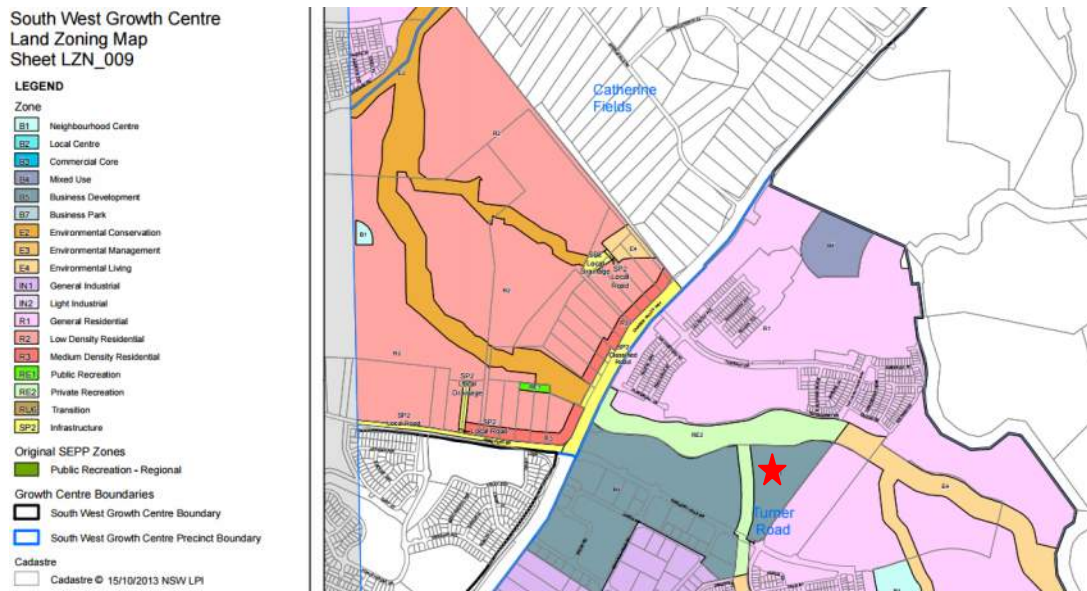


Figure 13 Zoning Map Extract, site marked by the red star (Source: SEPP Growth Centres LZN_009)

9.1.3 Zone Objectives

Clause 2.3(2) of the HLEP states that the consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.

The objectives of the B5 zone are below:

- *"To enable a mix of business and warehouse uses and specialised retail uses that require a large floor area, in locations that are close to, and that support the viability of, centres.*
- *To provide for a wide range of employment generating development.*

- *To provide for a mix of ancillary uses to support the primary function of providing employment generating development.*
- *To maintain the economic strength of centres by limiting the retailing of food, clothing and convenience shopping.*
- *To provide for a range of uses, including recreational uses and function centres, that complement other permissible employment generating land uses within the zone."*

Whilst the proposed development does not comprise business, warehouse or specialised retail, "hospitals" are a permitted use in the zone and will be a significant employment generating use with an estimate of 800 jobs to be generated from the site during the operation of the development.

Further, the proposed development includes ancillary uses to support the primary functions of development on the site for the purpose of a medical campus. These uses will not challenge the economic strength of nearby centres.

9.1.4 Land Use Definition and Permissibility

The proposed development is defined as a "health services facility" which will primarily consist of a private "hospital".

"health services facility means a building or place used as a facility to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes the following:

- (a) day surgeries and medical centres,*
- (b) community health service facilities,*
- (c) health consulting rooms,*
- (d) facilities for the transport of patients, including helipads and ambulance facilities,*
- (e) hospitals."*

The proposed hospital will include other ancillary/support uses such as car parking, shops and may include consulting rooms or other health-related uses, consistent with the definition of a "hospital" below:

"hospital means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following:

- (a) day surgery, day procedures or health consulting rooms,*
- (b) accommodation for nurses or other health care workers,*
- (c) accommodation for persons receiving health care or for their visitors,*
- (d) shops or refreshment rooms,*

- (e) *transport of patients, including helipads, ambulance facilities and car parking,*
- (f) *educational purposes or any other health-related use,*
- (g) *research purposes (whether or not it is carried out by hospital staff or health care workers or for commercial purposes),*
- (h) *chapels,*
- (i) *hospices,*
- (j) *mortuaries."*

"Health services facilities" including "hospitals" are permitted with consent in the B5 zone as confirmed in the land use table extract below:

"2 Permitted without consent

Nil

3 Permitted with consent

Light industries; Vehicle body repair workshops; Vehicle repair stations; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Airports; Airstrips; Amusement centres; Attached dwellings; Biosolid waste applications; Boarding houses; Caravan parks; Correctional centres; Dairies (pasture-based); Depots; Dual occupancies; Dwelling houses; Extractive industries; Farm buildings; Freight transport facilities; Group homes; Hazardous storage establishments; Helipads; Heliports; Home occupations (sex services); Hostels; Industries; Liquid fuel depots; Materials recycling or recovery centres; Mines; Multi dwelling housing; Offensive storage establishments; Office premises; Residential flat buildings; Restricted premises; Restriction facilities; Roadside stalls; Rural industries; Rural workers' dwellings; Sawmill or log processing works; Semi detached dwellings; Seniors housing; Sex services premises; Shop top housing; Stock and sale yards; Tourist and visitor accommodation (other than hotel or motel accommodation); Transport depots; Truck depots; Warehouse or distribution centres; Waste disposal land fill operations; Waste management facilities; Wholesale supplies."

9.1.5 Height of Buildings

There is no maximum height prescribed for the site on the height of buildings map in the SEPP (refer to the figure below).

However, subclause (5) of Clause 4.3 of the SEPP states as follows:

"(5) The consent authority may grant development consent for development on land within Zone B5 Business Development or Zone IN1 General Industrial, that does not exceed 15 metres in height above finished ground level, if the land has frontage to Badgally Road, Camden Valley Way, the Northern Road or East West Road (as shown in the Oran Park Precinct Development Control Plan or the Turner Road Precinct Development Control Plan), or to land within Zone RE1 Public Recreation or Zone RE2 Private Recreation."

Therefore, given the site has a western frontage to the RE2 zone, this clause will apply to the development. As consent is sought for buildings up to 25 metres in height, particular regard will need to be had to the objective, and intended outcomes, of this clause.

We have given some thought to the extent of the height variation and have concluded that the variation is within the ambit of Clause 4.6, noting that there is no numerical restriction on the application of this clause.


A comprehensive report requesting a variation to the implied height standard under Clause 4.6 will be submitted with the SSDA. Below is a summary of the key points that justify that the variation is well-founded:

- The development standard under Clause 4.3(5) is not expressly excluded from the operation of Clause 4.6.
- The objectives of the B5 Business Development zone will be satisfied as follows:

B5 Zone Objective	Response
To enable a mix of business and warehouse uses and specialised retail uses that require a large floor area, in locations that are close to, and that support the viability of, centres.	The proposed use, whilst not a "business", "warehouse" or "retail" use is permissible on the land and consistent with the last objective of the zone which supports a range of other uses and requiring large floor area and close proximity to the population it serves. The development will provide specialised health services that will support the growth of the south-western Sydney region.
To provide for a wide range of employment generating development.	The proposal is for an employment generating use, noting that around 800 jobs will be generated once the hospital is operational. Additional jobs will be promoted during construction. Employment generation from the development will be ongoing.
To provide for a mix of ancillary uses to support the primary function of providing employment generating development.	Ancillary uses will be provided within the hospital development to support the primary function (such as small retail shops, consulting rooms etc).
To maintain the economic strength of centres by limiting the retailing of food, clothing and convenience shopping.	Any retail component will be ancillary to the predominant hospital use, noting that the definition of a "hospital" under the Growth Centres SEPP includes "shops or refreshment rooms".
To provide for a range of uses, including recreational uses and function centres, that complement other permissible employment generating land uses within the zone.	As noted above, the proposed hospital is a permitted use that will complement other permissible employment generating land uses in the zone. Of particular note are the other planned/approved medical centres/services, aged care villages, childcare centres etc.

- The objectives of the height standard will be satisfied as follows:

Height Standard Objectives	Response
(a) to preserve the amenity of adjoining development in terms of solar access to dwellings, private open space and bulk and scale	<p>The closest residential development is opposite the site on the eastern side of The Hermitage Way. As demonstrated in Section 8.2.7 of this letter, the development will not overshadow any nearby residential uses. Private open space of those dwellings will not be impacted by the development.</p> <p>In terms of bulk and scale, we note that the Growth Centres SEPP and Turner Road DCP envisage buildings up to 15 metres in height and setback 5 metres from The Hermitage Way, which is the closest interface with residential uses. The proposal includes a "stepped" built form of two (2) storeys (approximately 12 metres) up to four (4) storeys (25 metres), setback between 7 and 58 metres from The Hermitage Way. See below.</p>

	 <p>The tallest part of the building where the greatest height variation is (shaded in green above), is located within the central part of the development, well setback from the sites' boundaries to mitigate visual bulk and scale.</p> <p>Due to these substation setbacks, combined with a generous streetscape landscape scheme (to be documented in the SSDA, the bulk and scale of the proposed concept will not compromise the visual amenity of residential development to the east. Arguable, the proposal will result in a more articulated, appropriately modulated and high quality built form than is envisaged in the Growth Centres SEPP and DCP.</p>
(b) to provide for a range of residential building heights in appropriate locations that provide a high quality urban form,	Not applicable as no residential development is proposed.
(c) to facilitate higher density neighbourhood and town centres while minimising impacts on adjacent residential areas,	Not relevant to the site/development.
(d) to provide appropriate height controls for commercial and industrial development.	The height control is not specifically related to commercial or industrial development, however, has clearly been applied on the basis that the TRDCP envisages the site will accommodate light industrial uses. The proposed height, whilst greater than the 15 metres indicated under the TRDCP, is appropriate for this permissible use, for the reasons set out above and further elaborated on below.

- With regard to the above, the proposed development will be in the public interest because it is consistent with the objectives of the standard and the objectives of the B5 zone.
- The social and economic benefits of the development are clear, noting that health care service delivery will be enhanced for the region and employment will be generated from the site. Any potential environmental impacts can be satisfactorily mitigated. On this basis, there is no public benefit in maintaining compliance with the development standard, particularly given the additional "height" directly equates to additional hospital beds and other services, resulting in a direct benefit to the community.
- Contravention of the development standard will not raise any matter of significance for State or regional environmental planning.
- There are sufficient environmental grounds to justify contravening the standard, as will be clearly demonstrated in the EIS that will be submitted with the SSDA.

- Compliance with the standard is unreasonable or unnecessary in the unique circumstances of this case. The objectives of the standard are achieved notwithstanding non-compliance with the standard. Also, the proposed development represents a better planning outcome for the site as opposed to a development that complies with the height control and the respective TRDCP setback. A compliant redevelopment would result in a 15 metre building setback only 5 metres from The Heritage Way frontage and only 3 metres from the adjacent riparian zone. Whereas, the proposed development provides a generous setback of up to 58 metres to the Hermitage Way, a setback of up to 20 metres to the riparian zone, street frontage activation and a "stepped", articulated and modulated built form of between approximately 12 metres (at the street frontage) and 25 metres for only part of the development. The tallest part of the development is centrally located within the site to mitigate any adverse impacts.

For the reasons set out above, the height variation is supportable and within the ambit of Clause 4.6 of the Growth Centres SEPP.

9.1.6 Floor Space Ratio

There is no maximum FSR prescribed for the site on the FSR map in the SEPP. There are no objectives or relevant Clauses applicable to the site's FSR in the SEPP.

9.1.7 Special Areas

Clause 6.6 of the SEPP applies to development in "Special Areas". The site is located in the Turner Road Employment Area as per the map extract below.

Subclause (2) states,

- *"The consent authority must not grant development consent for development on land in a special area unless a development control plan that provides for detailed development controls has been prepared for the land".*

A site specific DCP has been prepared for the area in Appendix B3 of the Turner Road DCP 2007 and will be considered as a part of the EIS for the SSDA.

9.1.8 Heritage

The site is not listed as a heritage item, in a conservation area or within the vicinity of a heritage item. Thus the provisions and objectives of Clause 5.10 are not applicable to this proposal.

9.2 Preliminary Site Investigations Carried Out To Date

9.2.1 Traffic and Parking

The following feedback has been provided by Mott MacDonald in relation to traffic and parking matters:

"Mott MacDonald has previously prepared a detailed Traffic Impact and Parking Assessment report for the entire Gregory Hills Corporate Park (GHCP) site. This strategic level submission demonstrated that the road network performed satisfactorily under future traffic conditions with the full development of the precinct. This document formed part of the application that was approved by Camden Council on the 14th August 2012 under DA number 277/2012. Subsequent to this a number of

supplementary proposals and traffic impact statements have been prepared to support the refinement of site staging, the overall masterplan and minor changes to various individual sites that make up the Gregory Hills Corporate Park (GHCP). These proposals adopt a consistent approach to that presented under DA 277/2012 and have previously obtained approval under DA 997/2014.

The current proposal will alter the approved use of the proposed site from business park, warehouse or retail to offer a privately operated community health facility, which is aimed at servicing a surrounding catchment that is planned to experience significant growth and compliment other precinct uses. The noticeable changes resulting from the proposal to the original approval would be weekday peak generated traffic and on-site parking needs. This is likely to result in increases in traffic during typical weekday peak periods. This impact is expected to be managed through typical hospital management practices, which include controlled staff shift patterns, allocating specific timed appointment that avoid where possible local road network peak operating periods and the timing of patient visiting hours.

A preliminary appraisal has been undertaken on the parking requirements for the proposed private hospital development, which was based on a 33,460m² facility under two stages and included both a private hospital and mental health facility function. Under this arrangement the assumed total staffing levels was 800 with an average weekday shift peak staffing level (including shift changeover periods) of 600 and 383 hospital beds. Using formulas based on the number of beds and staff per shift the calculated number of parking spaces required under the proposal ranged from 425 to 498 and was dependent on the adopted rates, which included RTA Guide to Generating Development 2002 and Austroads: Part 11 Parking (2009). The proposed development will provide 700 parking spaces, which based on the above rates is adequate parking provision to cater for the expected demand levels of the facility and will also help manage future growth and its impact on the surrounding network.

On this basis, access has been a key consideration in the selection of the site and Gregory Hills Corporate Park, and its selection was driven by its proximity to Hermitage Way and Gregory Hills Drive and the site's ability to offer alternative travel choices to the potential user groups and staff. This location is supported by committed upgrades in road infrastructure and access controls, and planned improvements in public transport and active transport services and facilities, which will all help to manage access and promote sustainable travel outcomes in the region."

A detailed traffic and parking assessment will accompany the SSDA.

9.2.2 Site Contamination

A Phase 2 Contamination Assessment was previously considered for the site during the assessment of the subdivision of the wider GHCP under DA 277/2012. The contamination assessment confirmed that there were no areas of environmental concern or remediation works required.

It is therefore considered that the site is suitable for the intended use.

A copy of the contamination assessment will be submitted with the SSDA.

9.2.3 Salinity

A Salinity Investigation and Management Plan was prepared for the site during the assessment of the subdivision of the wider GHCP under DA 277/2012. The plan identified the site as comprising "slightly saline" or "moderately saline" conditions. Management

strategies in the Plan relevant to the site will be implemented as a part of the construction of the proposed development, which will be the subject of a future detailed stage DA.

A copy of the plan will be submitted with the SSDA.

9.2.4 Stormwater & Flooding

Mott MacDonald has provided the following preliminary advice in relation to stormwater and flooding:

"As part of the Gregory Hills Corporate Park development a stormwater drainage network has been designed within the proposed road network to convey the 10 year ARI storm event in accordance with Camden Council requirements. The detained runoff from the subject site has been allowed for in the road drainage network with a pit and a 525mm diameter pipe connection being provided for the site off Digitaria Drive in the north western corner of the site. As per the approved DA, detention is required on the site with a volume of 1,375 m³ to be provided. This proposed drainage system for the development has been approved under DA 997/2014.

As per the approved DA a water quality management system is to be provided to treat the runoff from the site to meet the water quality reduction targets set by Camden Council as summarised in the table below.

<i>Pollutant</i>	<i>% Reduction in Pollutant Loads</i>
<i>Gross Pollutants (>5mm)</i>	<i>90%</i>
<i>Total Suspended Solids</i>	<i>85%</i>
<i>Total Phosphorous</i>	<i>65%</i>
<i>Total Nitrogen</i>	<i>45%</i>

These water quality targets are to be achieved by installing a water quality treatment train on the site consisting of proprietary off the shelf water quality treatment devices. These devices will be confirmed during the detailed design.

A future tributary is proposed along the western boundary of the site, with an alignment as approved under DA 227/2012. Currently construction certificate documentation for works within the tributary are with Camden Council for approval. As part of this submission a report was prepared by Mott MacDonald analysing the flood levels within the tributary. From this analysis it was determined that the 100 year flood event is wholly contained within the riparian corridor of the tributary with a minimum freeboard of approximately 2.3m to the finished surface level of the proposed hospital site."

9.2.5 Services

Mott MacDonald has provided the following advice in relation to utilities and services:

"Servicing for the site is to be provided as part of the Gregory Hills Corporate Park development. As part of the approval of DA 997/2014 a concept sewer and water layout was undertaken. Connections for both these services are proposed off Digitaria Drive in the north western corner of the site. Electricity, telecommunications and gas

are also to be provided for the site. Final servicing layouts will be documented as part of the detailed design."

9.2.6 Noise

HPI has confirmed that traffic noise from The Hermitage Way has been taken into consideration in the design of the hospital with regards to site setbacks and building materials proposed in the façade.

9.2.7 Overshadowing

A mid-winter shadow analysis of the proposed envelopes has been undertaken by HPI with an extract provided below.

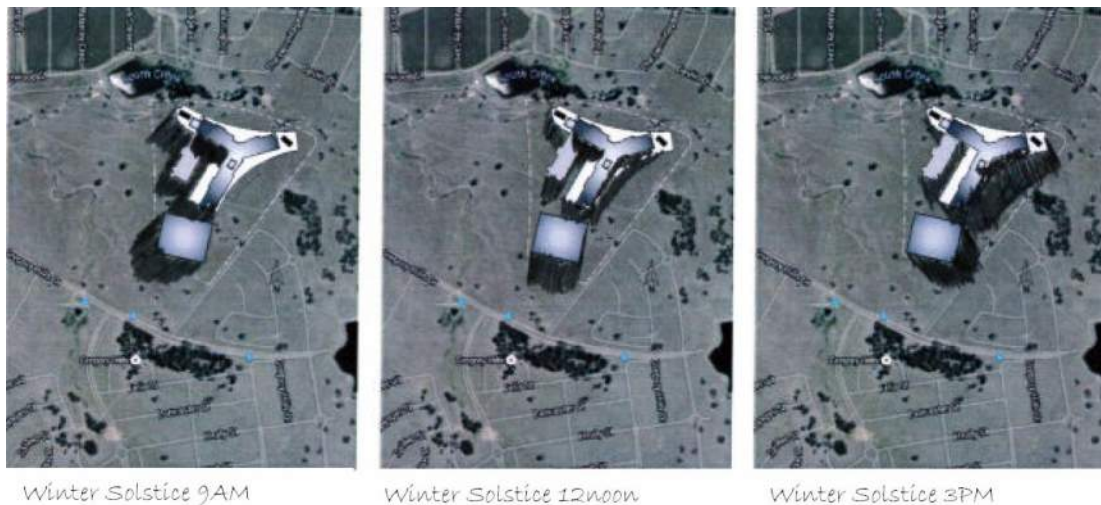


Figure 14 Mid-winter shadow analysis (Source: HPI)

As can be seen above, whilst there will be some shadow cast from the development, shadows fall mostly within the development site and are relatively fast moving and will not impact on the residential development to the east of the site (on the eastern side of The Hermitage Way). The land to the south of the proposal is zoned B5 and therefore, any future development of this land will not be residential in nature. The overshadowing to this site is therefore considered to be acceptable.

Mid-winter shadow diagrams will accompany the SSDA.

9.2.8 Bushfire

A previous Bushfire Protection Assessment (BPA) of the proposed development was undertaken by Eco Logical on 24 April 2012 on the basis that revegetation of riparian corridors within and adjacent the subject land would create areas of bush fire prone vegetation. These areas would then create Bush Fire Prone Land within the subdivision of the wider GHCP that would later be subject to the requirements of relevant planning legislation including 'Planning for Bush Fire Protection 2006' (PBP) and Australian Standard (AS) 3959-2009 'Building in bushfire-prone areas'.

Updated advice from Eco Logical was prepared on 13 March 2015 confirming that with changes to the approved Vegetation Management Plan (VMP) for the riparian zone, the central riparian corridor is now to be revegetated in such a way that this portion of the central riparian corridor will not constitute bush fire prone vegetation. Consequently, the Asset

Protection Zones (APZs) required for the subject site have been amended. Eco Logical confirmed that the APZ is appropriate for a "special fire protection purpose" such as a "hospital".

Further to the above, and subsequent to the Eco Logical bushfire advice, we note that Eco Logical prepared an updated Vegetation Management Plan (VMP) for the land (6 November 2015). The updated VMP confirms that the proposed revegetation of "management zone 1", which is the riparian zone adjacent to the hospital site, can be modified in accordance with the recommendations of the VMP so that it "does not post a bushfire threat to the surrounding development".

A copy of the advice and other reports from Eco Logical will accompany the SSDA.

9.2.9 Flora and Fauna

The site has been cleared pursuant to the subdivision approval for the GHCP under DA277/2012 and therefore no trees or vegetation will be removed to facilitate the proposed works.

10. Consultation

Preliminary consultation with Camden Council and the Local Area Health District (LAHD) has been undertaken. The preliminary feedback from both Council and the LAHD was very positive and encouraging of the provision of a new private hospital on the site to serve the south-western Sydney region.

11. Request for Secretary's Environmental Assessment Requirements

On the basis that the proposal falls within the criteria identified in Schedule 1 of the SRD SEPP, including a CIV in excess of \$30 million, Gregory Hills Development Company formally requests that the Department of Planning and Environment issue the Secretary's Environmental Assessment Requirements (SEARs) to facilitate the preparation of the Environmental Impact Statement to accompany the concept SSD application for the redevelopment of the Camden Medical Precinct in Gregory Hills.

If you require any additional information please contact Mel Krzus (Associate) in the first instance on 8270 3500 or the undersigned.

We would be pleased to meet with the DPE to discuss the proposal at any time.

Yours Sincerely,



Stephen Kerr
Executive Director



Attachment 1

Indicative Concept Plans

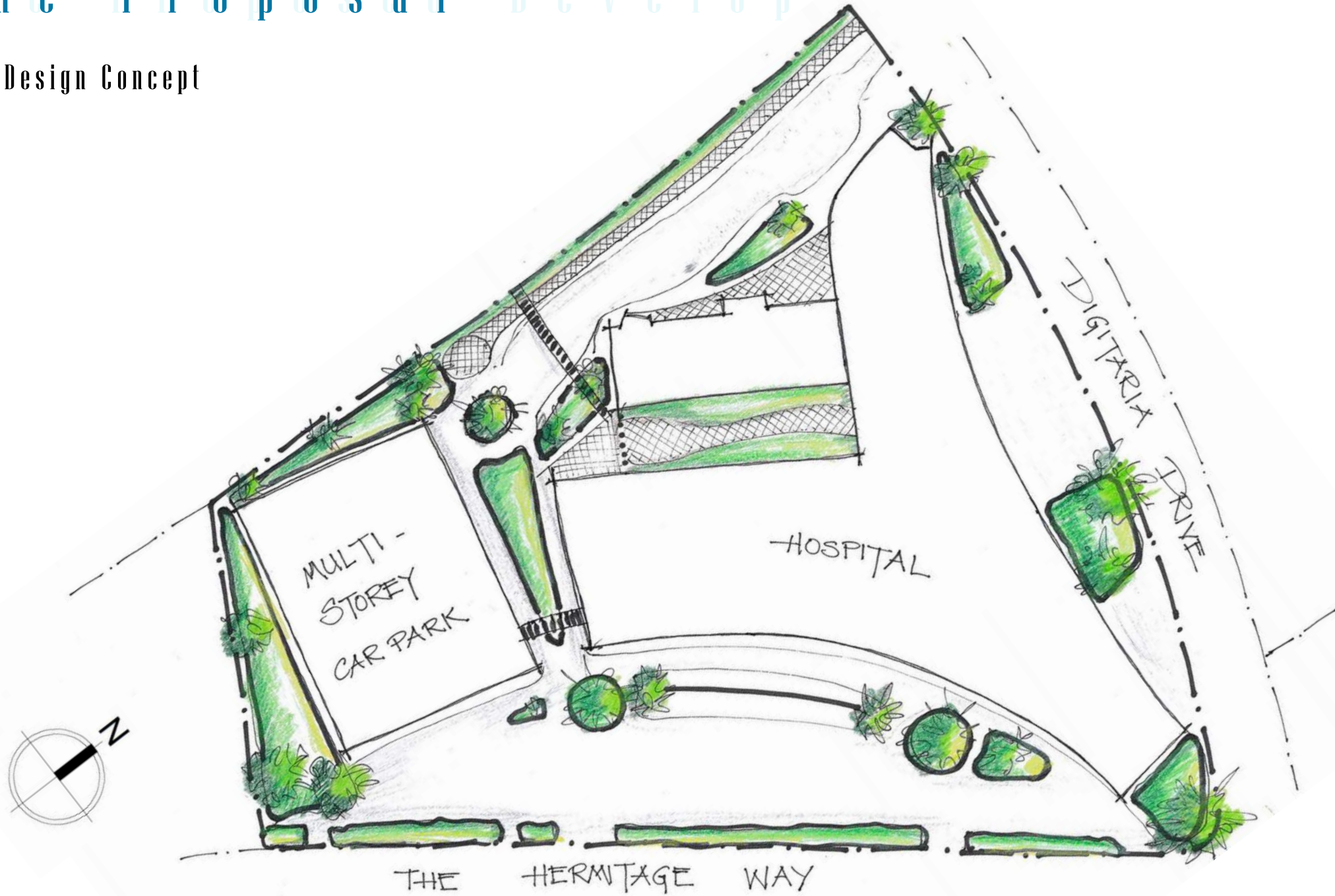
Concept Plan for the Camden Medical Campus

an exciting new private hospital for south western sydney



The Proposed Development

The Design Concept

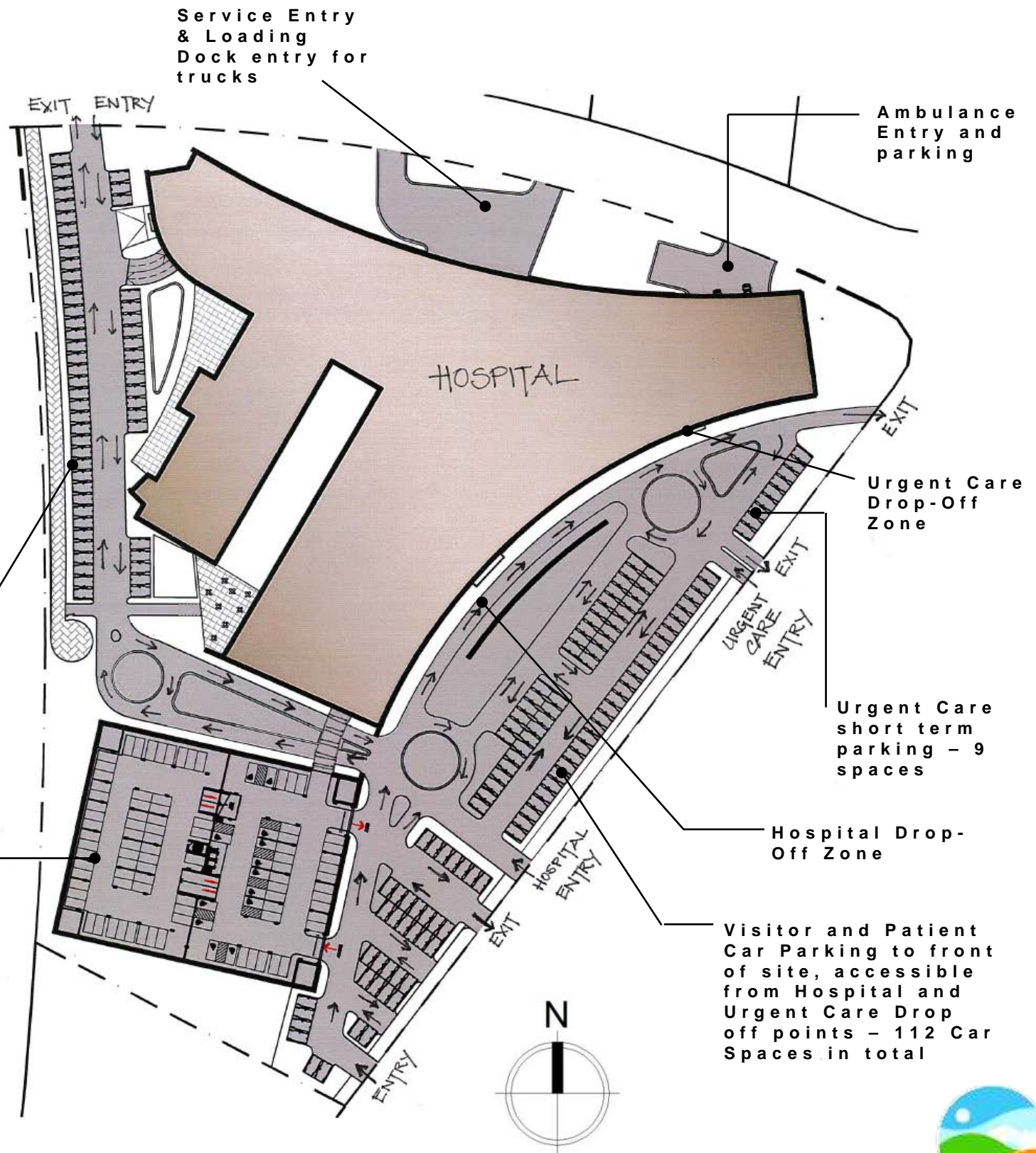


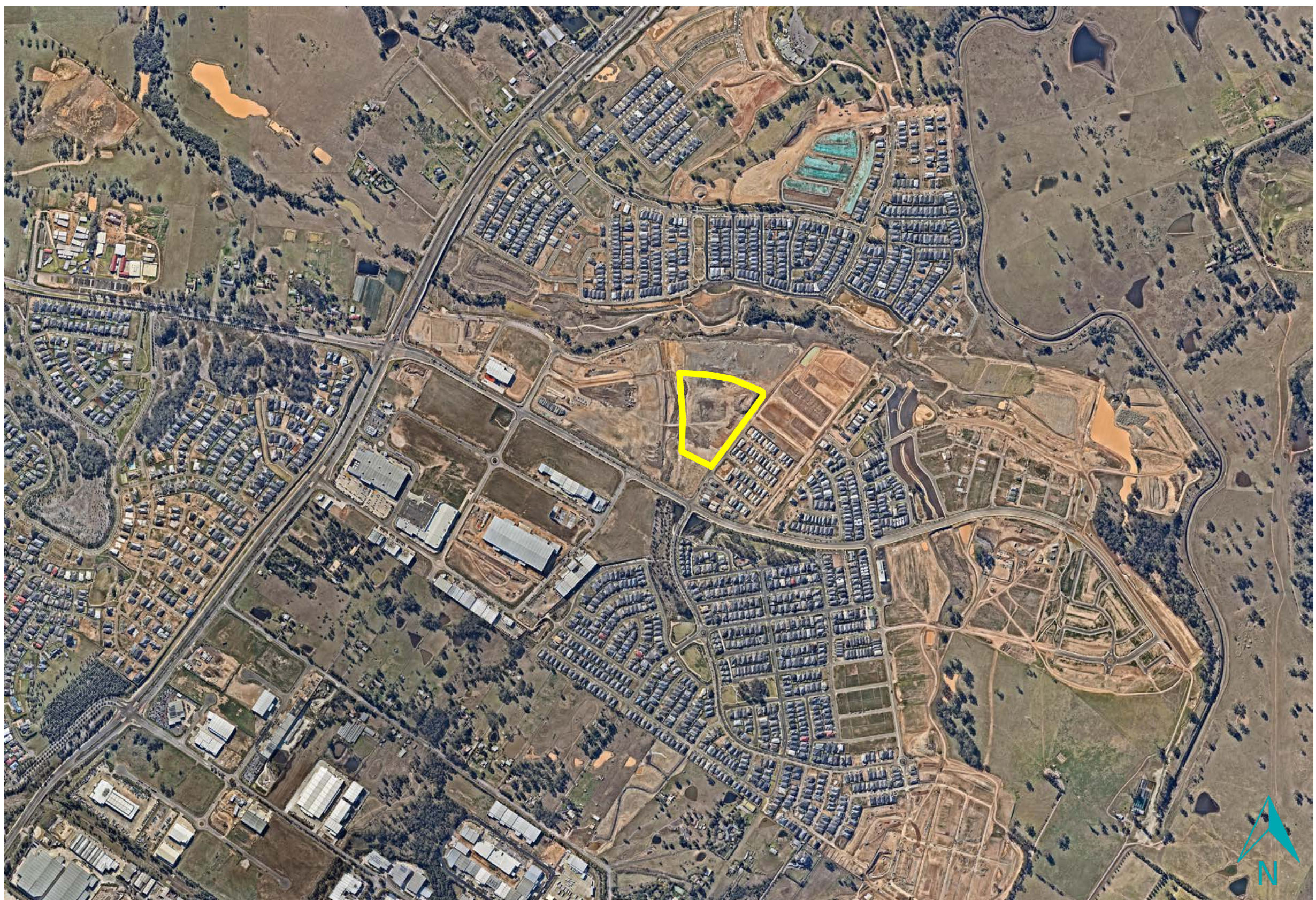
Indicative On-Site Parking & Site Setbacks

- 67 dedicated underground spaces for doctor
- 112 car spaces in front of and 58 in back of Hospital
- Multi-storey car park with 400 spaces in Phase I, which increases to 500 cars in Phase II
- Separate inpatient and outpatient access
- Ambulance and back-of-house access on secondary road
- A minimum setback of 7 metres has been maintained from all site boundaries

Visitor & Patient car parking on grade for Medical Suites and Outpatient Clinics - 58 Spaces

Multi-storey Car Park Building with 100 car spaces on each level on a total of 4 Levels. Further floors can be added in the future as hospital expands.





Local Site Context



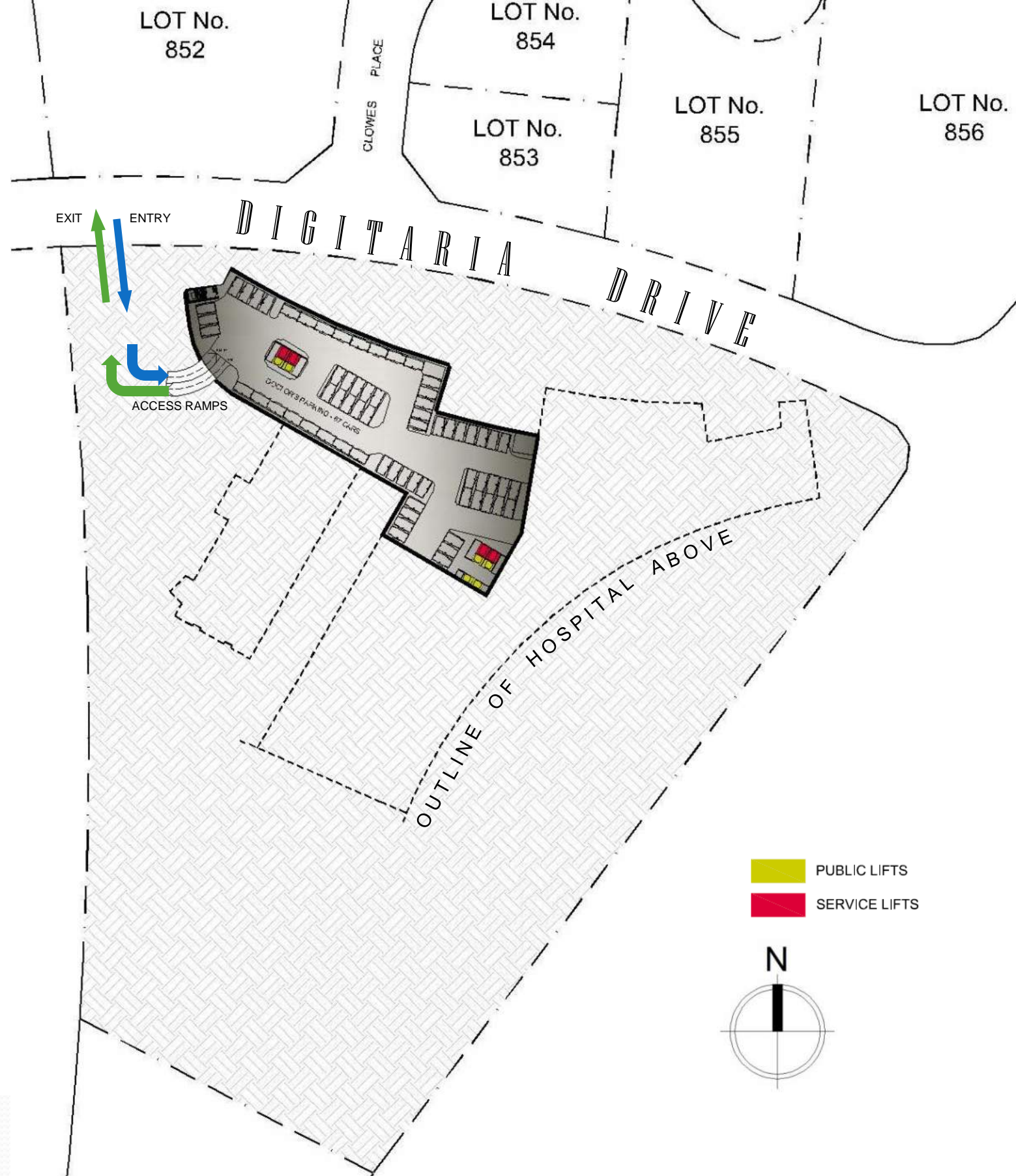
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Indicative Basement Car Park:

- Exclusive below-ground carpark for Doctors and Surgeons.
- Natural gradient of the site along Digitaria Drive allows for access ramps to and from basement parking beneath the Specialist Medical Suites.
- A total of 67 car parking spaces is accommodated with direct access to all public and service lifts.
- Doctors and Surgeons take advantage of direct lift access to Specialist Medical suites, Outpatient Clinics, Operating Theatres, ICU, Birthing Unit, Urgent Care and Inpatient Wards.
- Lifts provide added convenience for direct access from basement parking to lecture rooms and teaching facilities on Level 1.



B a s e m e n t P a r k i n g P l a n



Indicative Ground Floor Plan:

- Main reception easily identifiable from Hospital entry
- Internal link from reception to Urgent Care.
- Retail spaces along exterior of Hospital and separated from clinical zones
- Internal link to Medical Suites
- Back of house services adjacent to loading dock and segregated from visitor access areas
- Link from multi-storey carpark leading directly to main hospital lobby and retail space
- Medical Suites take advantage of views to the north
- Outdoor café dining with views of & walkway access to riparian zone

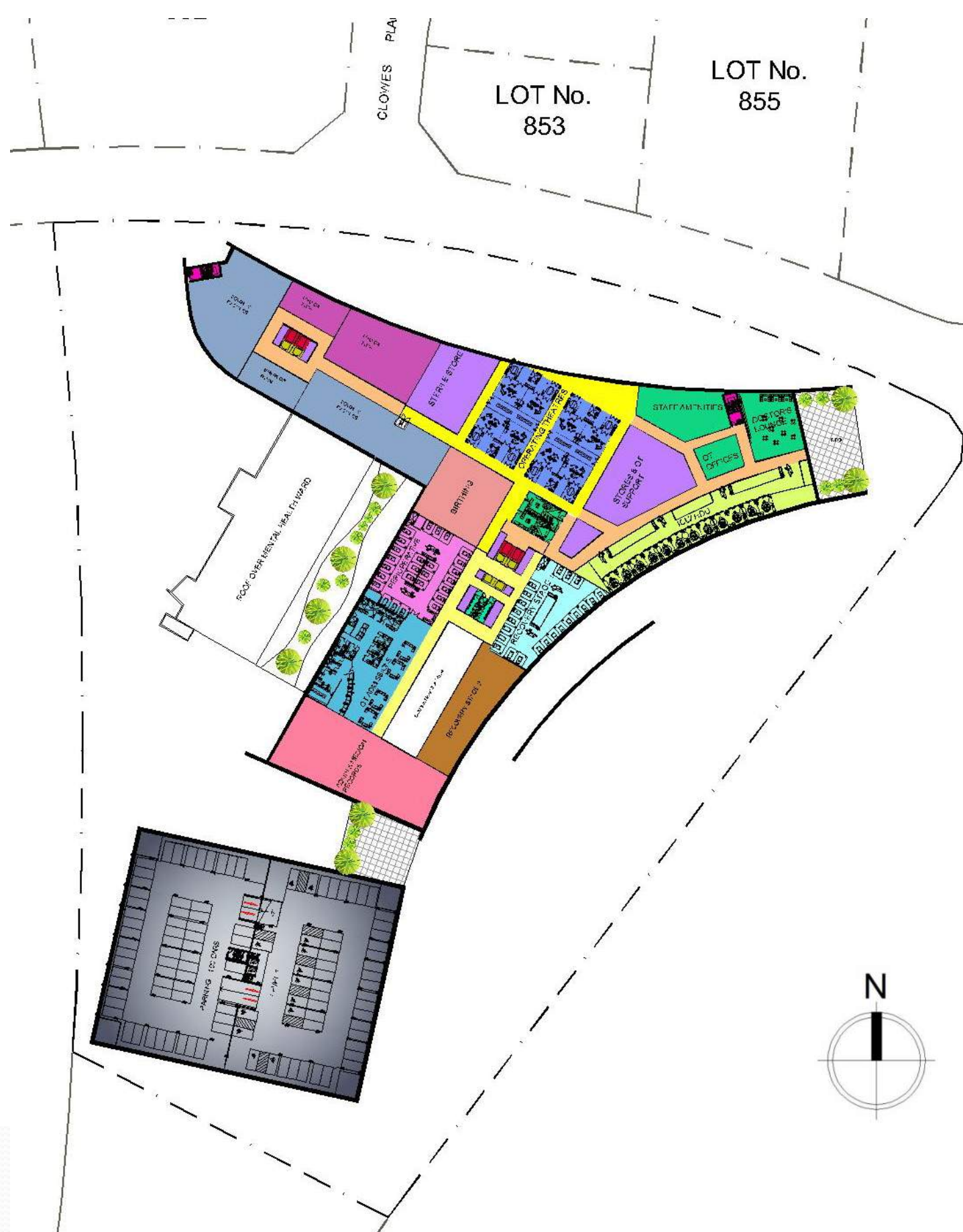


■	URGENT CARE WARD
■	ADMINISTRATION
■	RETAIL
■	MEDICAL IMAGING
■	SHORT STAY MEDICAL UNIT
■	CHEMOTHERAPY
■	RENAL DIALYSIS
■	CONFERENCE ROOM
■	MEDICAL SUITES
■	FIRE STAIRS
■	AMENITIES
■	MENTAL HEALTH (STAGE 2)
■	KITCHEN
■	LAUNDRY
■	SUPPLY
■	WASTE MANAGEMENT
■	LINEN
■	INPATIENT PHARMACY
■	PUBLIC LIFTS
■	SERVICE LIFTS
■	PUBLIC CIRCULATION
■	SERVICE CORRIDOR
■	SUPPORT AREAS



Indicative Level 1 Plan:

- Allowance for 8 operating theatres up to Phase II
- OT Admissions
- Pre-operative holding and post-operative recovery bays
- ICU/ HDU Ward
- Birthing suite
- Staff areas with outdoor deck
- Rehabilitation gym
- Medical Suites
- Teaching facilities with links to operating suite
- Double storeyed atrium over Ground Floor reception and entry lobby
- Doctor's and Staff Lounges with access to outdoor deck



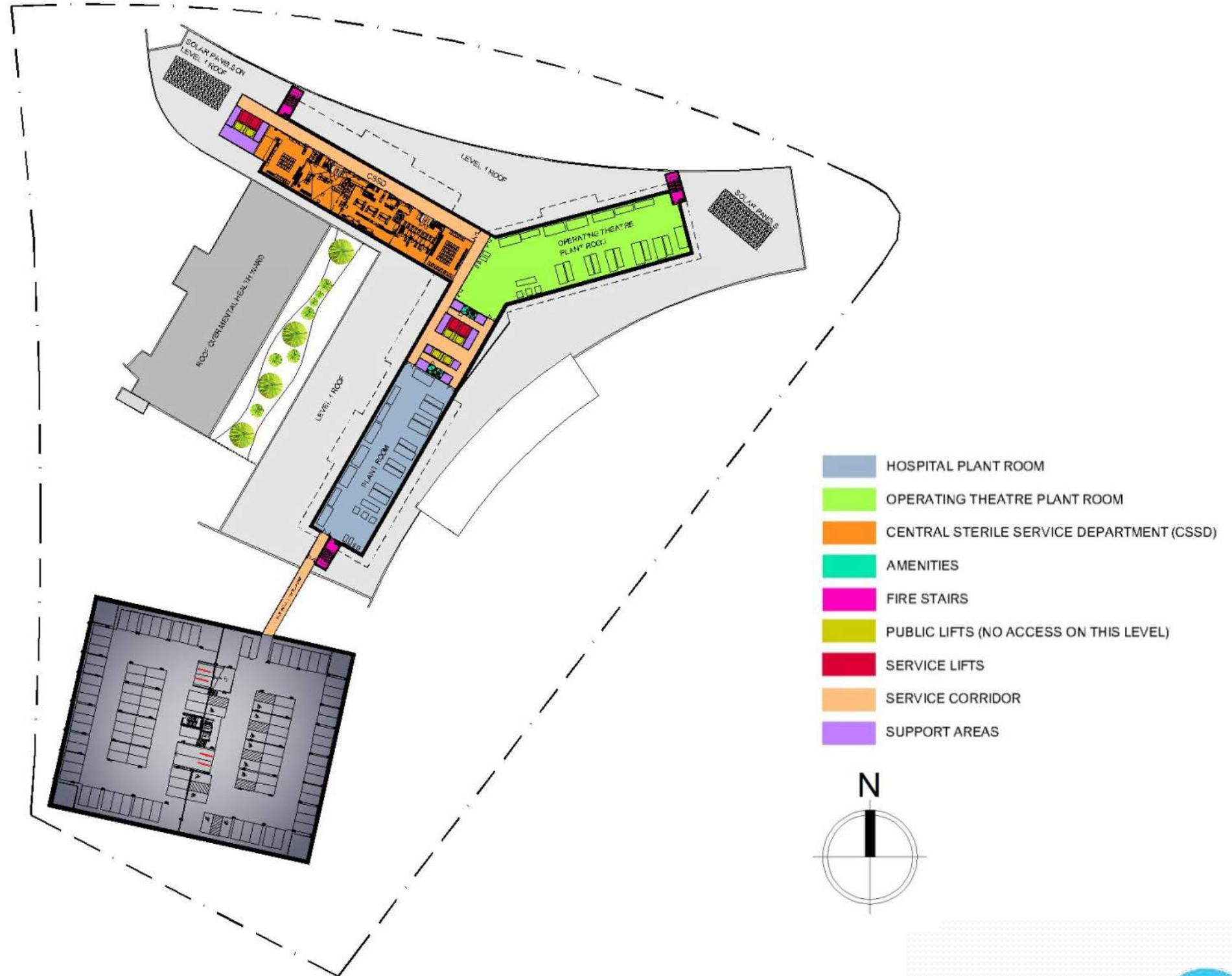
- OPERATING THEATRES
- BIRTHING UNIT
- ICU/HDU
- ADMISSIONS
- PERIOPERATIVE UNIT
- RECOVERY STAGE 1
- RECOVERY STAGE 2
- REHAB GYM
- ADMIN OFFICES
- STAFF LOUNGES
- PUBLIC AMENITIES
- STAFF AMENITIES
- PATIENT CHANGE FACILITIES
- MEDICAL SUITES
- TEACHING FACILITIES
- PUBLIC LIFTS
- SERVICE LIFTS
- PUBLIC CIRCULATION
- SERVICE CORRIDOR
- OT CLEAN CORRIDOR
- SUPPORT AREAS
- FIRE STAIRS

LEVEL 1 FLOOR PLAN



Indicative Level 2 Plan:

- Hospital and Operating Theatre Plant Rooms with space for expansion
- Location of Plant Rooms on this level allow for clear roof space, facilitating future vertical expansion
- Central Sterile Services Department (CSSD) located above Level 1 Operating Suite
- Potential link from multi-storey carpark to plant room to provide access for maintenance staff and transport of equipment
- Access to plant rooms and CSSD services via two sets of service lifts

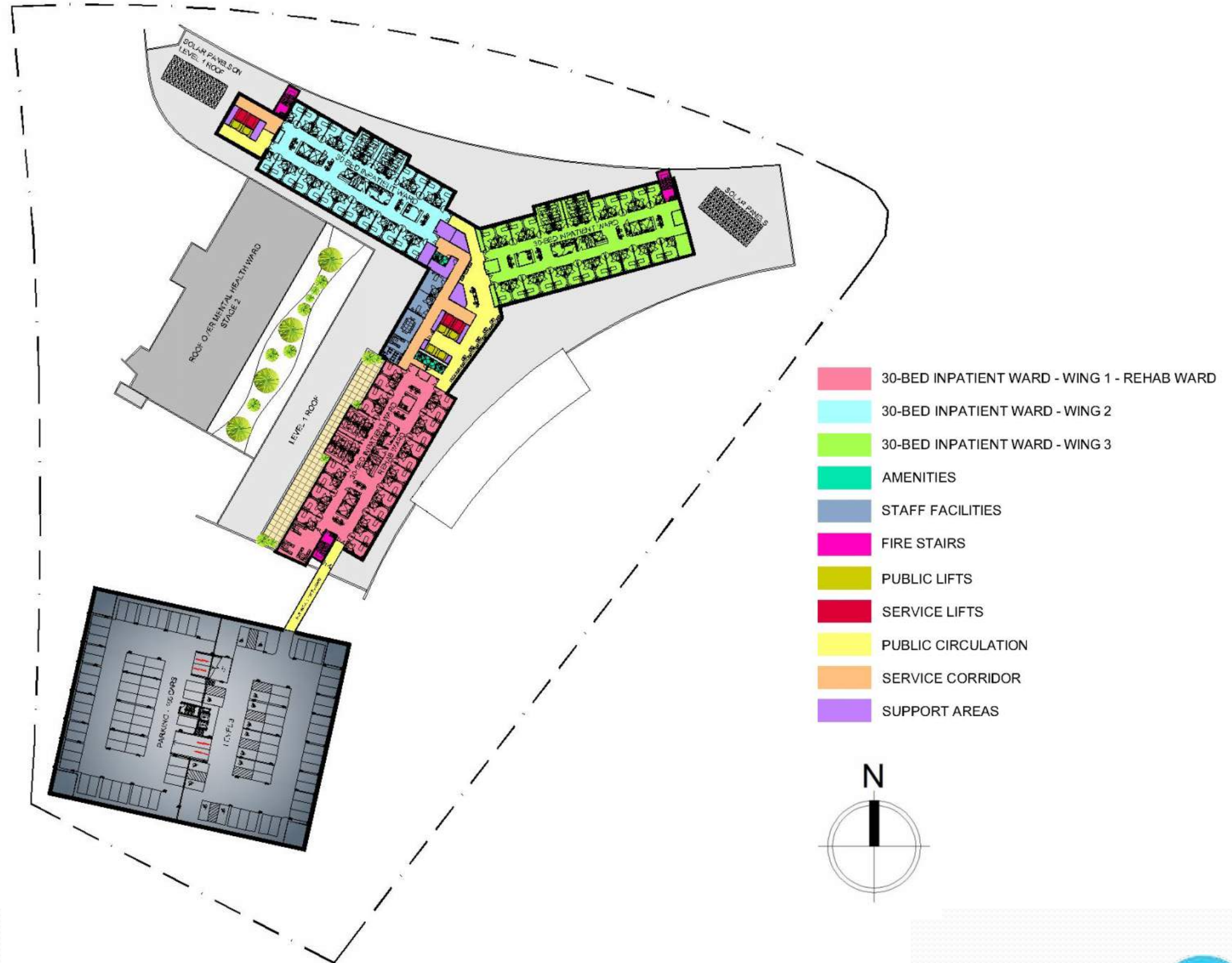


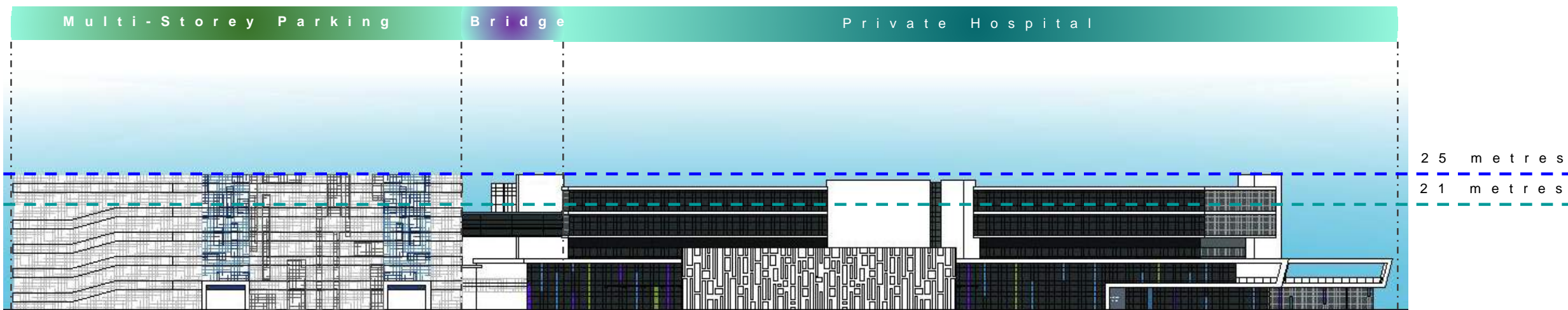
Indicative Levels

3 & Above

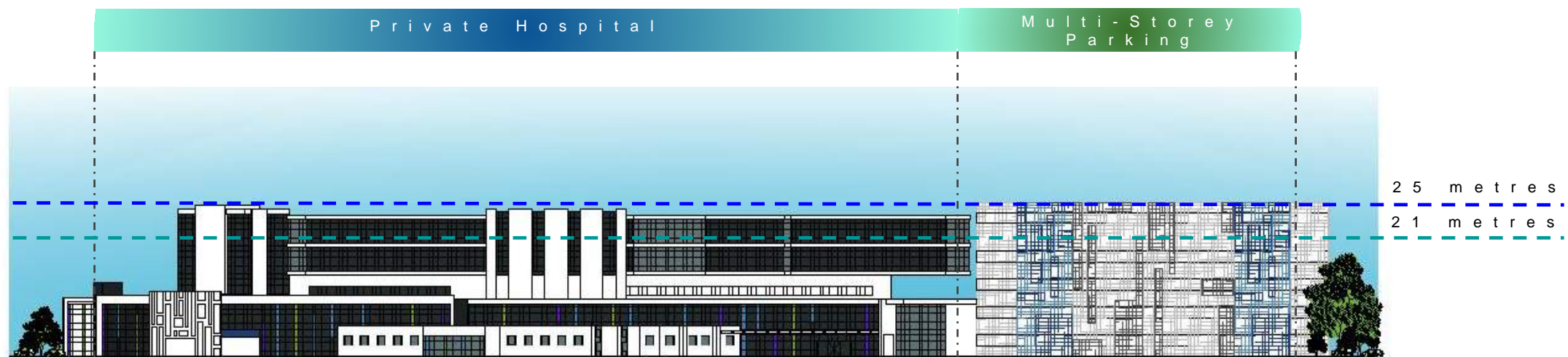
Plan:

- Typical ward floor
- 3 wings of 30-Bed Wards for a total of 90 inpatient beds on each ward level
- Wards are accessed for services via two sets of service lifts
- Inpatient rooms in each of the wards take advantage of views to the north, east or of the riparian zone to the west
- Potential on Level 3 for incorporation of 30-Bed Rehab Ward with outdoor courtyard





Main Hospital Elevation along "The Hermitage Way"



Rear Hospital Elevation along the Riparian Zone

NB: façade detailing is indicative only (subject to future detailed DA(s))

S i t e E n t r y V i e w o f H o s p i t a l f r o m t h e S o u t h



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V i e w o f H o s p i t a l f r o m t h e W e s t e r n R i p a r i a n Z o n e



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