



Planning &  
Environment

**STATE SIGNIFICANT DEVELOPMENT  
ASSESSMENT REPORT:  
Camden Medical Campus, Gledswood Hills  
(SSD 7387)**



Environmental Assessment Report  
Section 89H of the *Environmental Planning and  
Assessment Act 1979*

April 2017

## ABBREVIATIONS

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AIA	Acoustic Impact Assessment
Applicant	Gregory Hills Development Company Pty Ltd
APZ	Asset Protection Zone
CIV	Capital Investment Value
CMC	Camden Medical Campus
Consent	Development Consent
Council	Camden Council
CTMP	Construction Traffic Management Plan
DA	Development Application
DCP	Development Control Plan
Department	Department of Planning and Environment
EI	Environmental Investigation
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
GHCP	Gregory Hills Corporate Park
GTP	Green Travel Plan
ICNG	Interim Construction Noise Guideline
Minister	Minister for Planning
NCC	National Construction Code
OEH	Office of Environment and Heritage
RMS GTDG	<i>RMS Guide To Traffic Generating Developments 2002</i>
RMS	Roads and Maritime Services
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning and Environment
SEPP	State Environmental Planning Policy
SEPP SRD	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
SFPP	Special fire protection purpose
SRGC SEPP	<i>State Environmental Planning Policy (Sydney Region Growth Centres) 2006</i>
SSD	State Significant Development
TfNSW	Transport for NSW
VMP	Vegetation Management Plan

Cover Photograph: Site Concept Layout, Camden Medical Campus (Source: EIS)

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## EXECUTIVE SUMMARY

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This report is an assessment of a State significant development (SSD) application lodged by Gregory Hills Development Company Pty Ltd (the Applicant) seeking consent for a concept proposal for the Camden Medical Campus (CMC) at The Hermitage Way, Gledswood Hills. The application seeks consent for the future development of the site as a medical campus, including a private hospital and medical centre, future building footprints and envelopes, access, loading, parking and landscaping.

The project has a capital investment value (CIV) of approximately \$331.4 million and would generate 400 construction jobs and 800 direct jobs once operational.

The development is SSD under clause 14 of Schedule 1 of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) as the proposal is for the purposes of a health, medical or related research facility and has a CIV of more than \$30 million. Therefore, the Minister for Planning is the consent authority.

The site is located in the South West Priority Growth Area - Oran Park and Turner Road Precinct (Precinct) and is zoned B5 Business Development under *State Environmental Planning Policy (Sydney Region Growth Centres) 2006*. The proposed development is defined as a health services facility and is permissible with consent. The site is located in the Camden local government area.

The Environmental Impact Statement was exhibited from 4 August 2016 until 2 September 2016. The Department received thirteen submissions during the exhibition of the EIS comprising nine from public authorities, three from organisations and one from the general public. The matters raised in the submissions included: height of the proposal; traffic impacts; traffic modelling issues; timing of construction in relation to development of the surrounding road network; the status of the vegetation management plan (VMP) applicable to the adjoining riparian corridor and its effect on the need for an asset protection zone on the development site; and noise impacts from operation of the hospital and carpark on surrounding residential properties.

The Applicant provided a Response to Submissions (RtS) and addendum RtS, which included additional information, amended reports and responses to issues raised in the submissions. The Applicant advised that a section 96 modification application to modify the VMP for the adjoining riparian corridor was approved by Camden Council (Council) on 16 March 2017. The Applicant provided the Department with a letter from Council, confirming that Council would continue the maintenance required by the amended VMP once the riparian corridor was dedicated to Council. In response to traffic concerns, the Applicant provided amended traffic impact reports and consulted further with RMS regarding issues raised. RMS advised that no further traffic concerns were raised.

The Department has assessed the merits of the proposal and found the key issues associated with the development align with the key matters raised in the submissions.

The Applicant seeks concept approval for the building envelopes, building footprint, indicative uses and the future landscaping, parking arrangements, access points and loading facilities. The Department considers that until the final details of the CMC are provided as part of any future application for construction, the final layout of the car parking, landscaping or architectural details should not be endorsed. Notwithstanding, the Department is satisfied that the building envelope, as well as the general footprint of the future carpark and landscape setbacks can be endorsed subject to recommended conditions.

The Department considers the application is consistent with the objects of the *Environmental Planning and Assessment Act 1979* (including ecologically sustainable development), State

priorities and *A Plan for Growing Sydney*. The Department is satisfied that the subject site is suitable for the proposed development of the CMC which will provide the emerging suburbs of the South West Priority Growth Area with new health services. The Department is satisfied that the impacts of the concept proposal have been addressed through the EIS, RtS, addendum RtS or can be adequately managed through the recommended conditions recommended on the development. The Department therefore considers the proposal would be in the public interest and recommends that the SSD application be approved, subject to conditions.

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## 1. BACKGROUND AND PROPOSED DEVELOPMENT

### 1.1 Background

Gregory Hills Development Company Pty Ltd (the Applicant) seeks consent for a concept proposal for the Camden Medical Campus (CMC) incorporating a new private hospital, medical centre and ancillary services in Gledswood Hills. Consent is specifically sought for use of the site as a medical precinct, building footprints and envelopes, access, loading, parking and landscaping.

Development consent for the detailed design and construction of the new private hospital, medical centre and ancillary facilities will be sought as part of future development applications (DAs).

### 1.2 Site Description

The site is located approximately 70 km south-west of the Sydney central business district, 25 km south-west of Liverpool and 12 km north-west of Campbelltown in the Camden local government area. The site is currently located in an allotment described as Lot 8441 Deposited Plan (DP) 1218173, The Hermitage Way in Gledswood Hills. The allotment has an overall area of approximately 14.5 ha, with the development site comprising 4.2 ha. Camden Council (Council) granted consent to development application (DA) 997/2014 on 26 May 2015 to further subdivide Lot 8441 to create the final site boundaries for the CMC. At the time this assessment report was finalised, the approved lot has not been registered with the Land and Property Information.

The site is located at the eastern extent of a 30 ha parcel of land referred to as the Gregory Hills Corporate Park (GHCP). The GHCP is located in a relatively new 'greenfield' development area within the South West Priority Growth Area. A masterplan prepared by GHCP, which does not form part of any statutory approval for the GHCP, for the site shows a mix of future uses envisaged for the site including bulky goods retail and health services facilities. The site context is shown at **Figure 1**. The site location within the GHCP masterplan is shown in **Figure 2** and the approximate final boundaries of the CMC are shown in **Figure 3**.



Figure 1: Site context (Source: Google Maps)



Figure 2: Gregory Hills Corporate Park Masterplan (Source: Applicant's EIS)



Figure 3: Location of proposed Camden Medical Campus (Source: Nearmap, November 2016)

The site is irregularly shaped with a 250 m frontage to Digitaria Road to the north, 250 m frontage to The Hermitage Way to the east, a vacant lot to the south (earmarked for a future medical centre and paediatric hospital) and a future riparian zone immediately to the west (currently being established). Land uses in proximity to the site predominately include low density residential, located approximately 20m east of the site, and bulky goods retail, located approximately 300m west of the site. The site has been cleared of all vegetation under a separate development approval for DA 997/2014 approved by Council on 29 May 2015. Photographs of the site and surrounding development is shown at **Figures 4 to 6**.



**Figure 4: View of the site from the intersection of Hermitage Way and Digitaria Drive looking west toward Gregory Hills Drive and the Riparian Zone** (Source: Applicant's EIS)



**Figure 5: View of the site and residential dwellings opposite the site along The Hermitage Way taken from near the intersection of The Hermitage Way and Digitaria Drive looking south-west** (Source: Applicant's EIS)



**Figure 6: View of the site and residential dwellings opposite the site along The Hermitage Way taken from near the corner of The Hermitage Way and Digitaria Drive looking east**  
(Source: Applicant's EIS)

### 1.3 Project Description

Development consent is sought for a concept proposal to establish a medical campus on the subject site and set the building footprints, envelopes and heights, vehicle entry and egress points, car parking and landscaping. The detailed design and construction of the proposed new private hospital and medical centre will be sought via future development applications (DAs).

**Table 1** provides a summary of the proposal's key components and features. **Figure 7** shows the proposed conceptual site layout.

**Table 1: Key development components**

<b>Development Summary</b>	A concept proposal for use of the site as a medical campus with a new private hospital, medical centre and ancillary services. Consent is sought for: <ul style="list-style-type: none"> <li>• future building footprints and envelopes;</li> <li>• indicative land uses;</li> <li>• vehicular, pedestrian and cycle access;</li> <li>• loading facilities;</li> <li>• landscaping; and</li> <li>• parking arrangements.</li> </ul>
<b>Maximum Building Height</b>	26.6 m / 6 storeys
<b>Maximum Gross Floor Area</b>	73,000 sqm
<b>Maximum Number of Car Parking Spaces</b>	1,080 (basement, at-grade and multi storey car parking)
<b>Capital Investment Value</b>	\$331,491,133

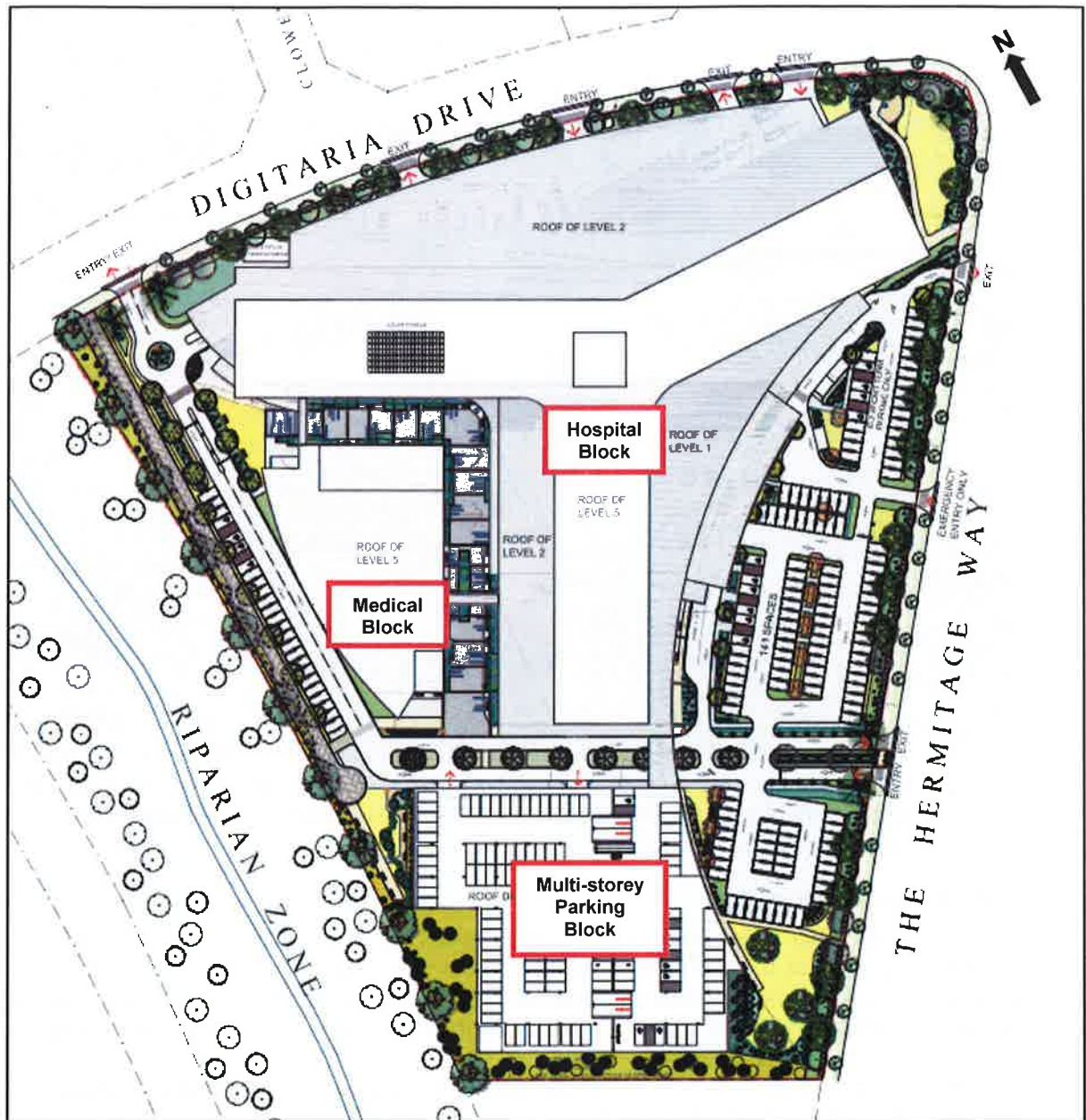


Figure 7: Proposed Concept Site Layout Plan (Source: Applicant's EIS)

#### Approved Site Works

Boundaries for this development site were approved by the development consent issued by Council for DA 997/2014 on 29 May 2015, comprising the staged subdivision of land to create 16 business lots (including the future final site boundaries for the CMC), two drainage lots, one infrastructure lot and one residue lot, construction of roads, drainage, landscaping and associated site works. The Applicant has advised that the works below were completed in August 2016:

- construction of Digitaria Drive, comprising of four lanes, and a roundabout at intersection with The Hermitage Way;
- construction of The Hermitage Way, comprising two lanes, from Gregory Hills Drive to the roundabout with Digitaria Drive;
- provision of infrastructure services, comprising water, sewerage, stormwater, telecommunications and electricity to the site; and
- provision of streetlights and street landscaping.

Registration of the lots created by the development consent of DA997/2014, including the future development site boundaries of the CMC with Land and Property Information, has not occurred at the time of this report.

### Project Staging

The construction of the CMC is proposed to be undertaken in three stages through to the year 2040. The staging plan has not been finalised, however the Applicant has provided the following indicative staging and estimated hospital bed count for each stage:

- Stage 1 – construction of the basement parking and core health services and associated supporting functions including (but not limited to) surgical services, urgent care, imaging, a pharmacy and day treatment areas. These services are proposed to be housed in the first three storeys of the main hospital building. An estimate of 138 beds is provided in relation to Stage 1 works.
- Stage 2 – construction of three levels of the multi-storey parking block and the ground floor of the medical block. Works will be undertaken on levels 1 – 4 of the hospital block to facilitate the provision of additional health services and patient beds. An additional 152 beds will be provided, increasing the number of beds provided onsite to 290 beds.
- Stage 3 – construction of the remaining two levels of the multi-storey parking block and five levels of the medical block will be undertaken. All levels of the hospital block will have additional works undertaken including the construction of a new storey (Level 5). An additional 180 beds will be provided, for a final total of 473 beds in the CMC.

### Proposed Indicative Built Form and Layout

The proposal seeks consent for an indicative built form and layout of the medical campus, with the final detailed design of the CMC to be delivered in subsequent development applications. The site has been separated into three building blocks comprising: a hospital block; a medical block; and a multi-storey parking block. The proposed buildings are sited centrally on the site with the at-grade car parking spaces located adjacent to the eastern and western boundaries. The overall proposed building footprint, inclusive of the multi-storey carpark, comprises 18,891 sqm, resulting in an overall site coverage of 45.6 per cent.

The concept architectural plans provided by the Applicant demonstrate that each building block is differentiated by its massing, shape and setbacks. The indicative perspectives indicate that building blocks can also be differentiated by external finishes.

The concept for the hospital block is characterised by a podium-tower style building with a high level of glazing. The podium component of the building is three storeys with a three-winged tower component comprising a further three storeys on top of the podium. The medical block comprises a six storey building separated from the hospital building by a 12 m pedestrian walkway (refer to **Figure 7** for location of the Medical Block). The indicative finishes for the medical block are unknown, noting that the indicative perspective submitted with the EIS presents a two storey building with an alternative parking layout when compared to the submitted architectural concept plans. The multi-storey parking block comprises six storeys, clad with fibre cement. A proposed perspective of the future CMC viewed from The Hermitage Way, identifying the hospital block and multi-storey parking block is provided in **Figure 8** below.



**Figure 8: Perspective view from The Hermitage Way looking west towards the proposal (Source: Applicant's EIS)**

The EIS states that the design intent is to provide a strong street presence with an active street frontage through the following design considerations:

- the hospital footprint has been designed to follow the alignment of The Hermitage Way in an effort to reinforce the street character;
- ancillary retail spaces will address The Hermitage Way to aid in achieving an active street frontage; and
- the setbacks and elevation panes have been proposed to reduce the scale of the hospital when viewed from the street.

The proposal has been setback between 6.5 m and 56.5 m from The Hermitage Way and a minimum of 6.45 m from the riparian corridor to the west.

#### Landscaping

The proposed future landscaping design will incorporate a mix of trees, shrubs, climbers and groundcovers between the building and site boundaries. Large iconic *Araucaria cunninghamii* (Hoop Pines) trees are proposed adjacent to the two main public vehicle entrances on Digitaria Drive and The Hermitage Way to aid in wayfinding. Trees and shrubs will be provided in landscaped nodes within the at-grade car parking areas to visually soften these spaces. Planter boxes containing shade tolerant plants, laser cut panels, varying pavement materials and bench seating will be provided along the main walkway between the hospital block and medical block to ensure visual interest between buildings and to ensure the space is utilised as a passive recreation area for staff, patients and visitors. Planting adjacent to the riparian corridor will mimic planting used within the riparian corridor to create visual continuity. A water sensitive urban design treatment feature emulating the riparian corridor and utilising water runoff from the rooftop of the multi-storey carpark will be between the multi-storey carpark and western site boundary. The landscaping concept proposed for the CMC is provided in **Figure 9** below.

Tree removal is not proposed as the site is clear of vegetation.

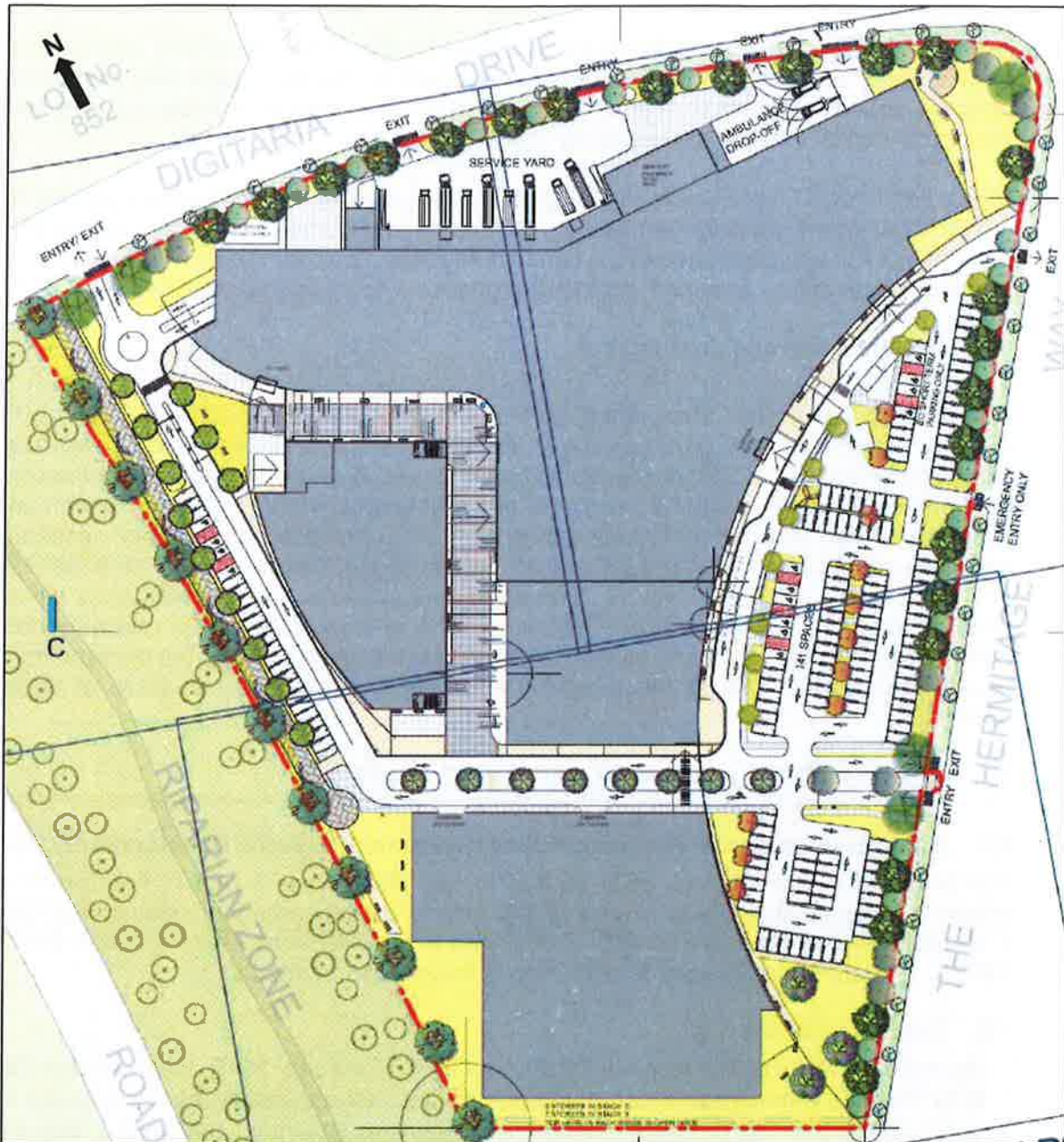


Figure 9: Concept landscaping proposed for the CMC (Source: Applicant's EIS)

### Access

Vehicle access to the site is proposed from Digitaria Drive and The Hermitage Way via a two-way driveway and an additional egress driveway to The Hermitage Way. These driveways connect to the central spine road which provides access to three visitor parking areas. Access to the basement level parking is provided from the driveway off Digitaria Drive. A separate emergency ingress is provided from The Hermitage Way connecting to the emergency department's drop-off area for urgent care. Additionally, separate ambulance ingress and egress is provided from Digitaria Drive connecting to an ambulance drop-off area adjacent to the northern site boundary.

Pedestrian access will be provided via multiple pathways from Digitaria Drive and The Hermitage Way. Bicycle access will be provided from the combined ingress and egress driveways from Digitaria Drive and The Hermitage Way. Separate service vehicle access is provided from Digitaria Drive and connects directly to the service yard and loading docks.

### Parking

A total of 1,080 car parking spaces are proposed for the CMC, comprising 844 spaces within a multi-storey carpark, 135 at-grade spaces adjacent to The Hermitage Way site frontage, 25 at-grade spaces adjacent to Digitaria Drive and 76 spaces within a basement carpark below the main hospital building accessed via Digitaria Drive.

Visitor parking will be provided in the at-grade parking spaces and multi-storey parking building with the basement parking reserved for specialists and consultants. The location of bicycle parking has not been indicated in the conceptual plans, however the EIS indicates that bicycle parking spaces will be provided within the proposed future parking locations.

### **1.4 Project Need and Justification**

The site and surrounding area is located within the South-West Growth Centre and is experiencing significant development in line with the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (SRGC SEPP). The South-West Growth Centre is expecting an additional 325,850 residents over the next 20 years, including more than doubling the number of residents aged 65 and over and greatest percentage of its population under 15 years compared with other Sydney subregions. The increase in population, particularly in residents aged 15 or under and 65 or over, will generate a high demand for health services and facilities. The Applicant advises that existing hospital facilities in the locality are already under stress with the 'general rule of thumb' ratio of 3 beds per 1000 residents not being achieved at existing population levels. The proposal will aid in meeting the demand for private health services and reduce the need for residents to travel of other areas of Sydney for treatment.

## **2. STATUTORY AND STRATEGIC CONTEXT**

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### **2.1. State Environmental Planning Policy (State and Regional Development) 2011**

The proposal is classified as SSD as it is for the purpose of a health, medical or related research facility, with a CIV in excess of \$30 million, as defined under clause 14 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). Therefore, the Minister for Planning is the consent authority.

### **2.2. Delegated Authority**

In accordance with the Minister's delegation dated 16 February 2015, the Executive Director, Priority Projects Assessments can determine the subject application as the relevant Council has not objected to the proposal, no political disclosure statement has been made and less than 25 public submissions have been received objecting to the proposal.

### **2.3. Permissibility and Zoning**

The site is located in the South West Priority Growth Area – Oran Park and Turner Road Precinct (the Precinct). Development controls for land within the Precinct are defined under Appendix 1 of the SRGC SEPP.

The site is zoned B5 Business Development under the SRGC SEPP. The proposal is defined as a 'health services facility', which is permitted with consent in the B5 zone. Health services facilities specifically include the following uses:

- medical centres;
- community health service facilities;
- health consulting rooms;
- facilities for the transport of patients, including helipads and ambulance facilities; and
- hospitals.

In accordance with clause 1.8 of Appendix 1 of the SRGC SEPP, all local environmental plans and deemed environmental planning instruments (EPIs) that apply to land within the Precinct are repealed.

#### 2.4. Environmental Planning Instruments

The Department's consideration of relevant EPIs and draft EPIs is provided in **Appendix B**, including the following:

- *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP);
- *State Environment Planning Policy No 20 – Hawkesbury Nepean River (No 2 -1997)* (SEPP 20);
- *State Environment Planning Policy No 33 – Hazardous and Offensive Development* (SEPP 33);
- *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55);
- *State Environment Planning Policy (Infrastructure) 2007* (ISEPP); and
- *State Environment Planning Policy (Sydney Region Growth Centres) 2006* (SRGC SEPP).

The Department is satisfied that the proposed development generally complies with the relevant provisions of these EPIs.

#### 2.5. Objects of the EP&A Act

Decisions made under the *Environmental Planning and Assessment Act 1979* (EP&A Act) must have regard to the objects of the EP&A Act, as set out in section 5 of the Act (see glossary at **Appendix C**). The proposal complies with the objects of the EP&A Act as it would deliver health facilities to promote social welfare of the State. The proposal also supports the orderly development of land within a site which is zoned to allow for the development of hospitals.

#### 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* (see glossary at **Appendix C**). Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- (a) *the precautionary principle,*
- (b) *inter-generational equity,*
- (c) *conservation of biological diversity and ecological integrity,*
- (d) *improved valuation, pricing and incentive mechanisms.*

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 8.6 of the Applicant's EIS, which has been prepared in accordance with the requirements of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

The proposal is located on vacant land cleared of all vegetation and therefore does not result in the removal of trees. The submitted landscape concept includes the future planting of various indigenous canopy trees and flowering understorey planting providing a variety of species on the site. Plant species have been chosen due to their ease of maintenance and proven viability in the locality. The site is not subject to any known effects of flooding. The site would not be impacted by changes in sea level resulting from climate change.

The site is not identified as bushfire prone land, however planting associated with the approved Vegetation Management Plan (VMP) for the adjoining riparian corridor, will result in the

creation of a bushfire threat if the vegetation is not maintained as per requirements of the VMP in perpetuity. As ownership of the riparian corridor will be transferred to Council after an initial five year period, the Applicant has provided a letter from Council confirming that Council will accept the future maintenance responsibility of the riparian corridor once the land has been formally dedicated.

The Applicant has identified a range of typical ESD initiatives which have been incorporated in previously completed health facilities and that can be incorporated in the final design of the CMC. These initiatives include double or triple panned glazed curtain walling system for the façade, provision of solar panels, light motion sensors in rooms used infrequently and energy efficient heating and cooling systems. The Applicant has advised that the initiatives used will be detailed in the subsequent development applications. The Department has considered the development in relation to the ESD principles and is satisfied that sustainability initiatives used in previously completed health facilities can be incorporated into the final design of the CMC, in accordance with the objects of the EP&A Act and EP&A Regulation. The Department has recommended a condition requiring future development applications outline ESD initiatives incorporated into the final design of the CMC.

## **2.7. Environmental Planning and Assessment Regulation 2000**

Subject to any other references to compliance with the EP&A 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 appropriate for the site given:

- it is consistent with *NSW State Priorities* to build infrastructure to support the emerging suburb of Gledswood Hills, and to ensure NSW residents have health infrastructure;
- it is consistent with *A Plan for Growing Sydney*, as it would support the existing and future demand generated for health facilities generated by the ongoing development of the South West Growth Centre;
- it is consistent with priorities of the *Draft South West District Plan*, as it will provide a new health care facility located within close proximity to residential areas and aids in increasing knowledge intensive jobs for the district;
- it is consistent with the Turner Road Development Control Plan 2007 (TRDCP 2007) and Camden Development Control Plan 2012, as it proposes a land use which is consistent with the desired future character of the locality;
- it is consistent with the *NSW Long Term Transport Master Plan 2012*, as it supports the model shift from private vehicle transport to public and other modes through its location close to bus services;
- it is consistent with *Sydney's Cycling Future 2013*, as it will promote and cater for bicycle use through provision of cycle paths, road and traffic control treatments and parking facilities which will be detailed in the future development application stage details;
- it is consistent with the *Sydney's Walking Future 2013*, as it proposes a footpath system within the site which aligns with the footpaths proposed in the TRDCP 2007;
- it is consistent with the Healthy Urban Development Checklist, as it is generally consistent with the checklist requirements;
- it is consistent with the recommendations of the *State Infrastructure Strategy Update 2014*, as it proposes a private health facility in the South-West region to help ease demand for public health services in the region; and
- it would provide direct investment in the region of \$331,491,133 million, which would support 400 construction jobs and 800 direct and 2,400 indirect jobs during operation, should the development as envisaged in the concept proposal be approved in full.

## 2.9. Secretary's Environmental Assessment Requirements

The EIS is compliant with the Secretary's Environmental Assessment Requirements and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

## 3. EXHIBITION CONSULTATION AND SUBMISSIONS

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### 3.1. Exhibition

In accordance with section 89F of the EP&A Act and clause 83 of the EP&A Regulation, the application and accompanying information was publicly exhibited from 4 August 2016 until 2 September 2016 for 30 days:

- on the Department's website; and
- at the Department's Information Centre, Narellan Library and, as Council was moving offices, Council Customer Service Centre first at Camden and subsequently at Oran Park.

The Department also advertised the public exhibition in the Sydney Morning Herald, the Daily Telegraph, the Campbelltown MacArthur Advertiser and the Camden Advertiser on 3 August 2016. The relevant State and local government authorities and adjoining landowners were notified in writing.

The Department received thirteen submissions during the exhibition of the application comprising nine from public authorities including Camden Council, three submissions from organisations and one submission from the general public. A summary of the key issues raised in the submissions is provided below.

### 3.2. Public Authority Submissions

No public authority objected to the proposal during notification, however, Camden Council, Department of Primary Industries (DPI), Transport for NSW (TfNSW), Department of Industry – Geological Survey of New South Wales (GSNSW), Sydney Water, NSW Environment Protection Authority (EPA), Roads and Maritime Services (RMS), NSW Rural Fire Service (RFS) and the Office of Environment and Heritage (OEH) provided comments for consideration in the Department's assessment of the application. A summary of the issues raised is provided below.

**Camden Council** provided the following comments for consideration:

- concerns are raised regarding the applicable VMP;
- the proposed variation to the maximum building height development standard and interface with adjacent land, requires careful consideration;
- any works within the waterfront area will either need to be consistent with the *Oran Park and Turner Road Waterfront Land Strategy* or will require a Controlled Activity Approval from the Department of Primary Industries Water pursuant to the *Water Management Act 2000*;
- the proposed relocation of Council's drainage easement will need to be negotiated separately with Council;
- a minimum two metre landscape buffer must be provided along the site's frontage to the riparian corridor;
- indicative perspectives should be provided to understand the visual impacts of the proposal to the adjacent riparian corridor;
- consideration should be given to the location of future signage for the proposed development;
- the proposal shall comply with all required National Construction Code (NCC) standards and associated Australian Standards including standards for lighting, parking, driveways, ramps, traffic aisles and food premises;

- any roof mounted equipment should be integrated to the overall design of the development to ensure it is neither visually dominant nor prominent;
- the submitted intersection analysis of Gregory Hills Drive/The Hermitage Way and Donovan Boulevard is inconsistent with previous applications which had some traffic movements operating at Level of Service (LOS) F. The additional traffic resulting from the development of the CMC would significantly affect the operation of this intersection. A peer review of the submitted modelling should be undertaken to ensure that the intersection can accommodate the traffic generated by the CMC;
- the surrounding road network should be completed prior to the operation of the proposed development;
- the number of access points proposed appears excessive and may create confusion and potential conflict for motorists. Rationalisation of the access points should be considered;
- access from The Hermitage Way should be limited to left in/left out;
- analysis of queue lengths during peak arrival times should be undertaken during the concept approval stage as it may impact the future scale of the development;
- further details of the loading and servicing area is required including the number of vehicles expected per day, the size of the vehicles, loading bay dimensions and the submission of a loading service management plan;
- the number of car parking spaces required for each stage should be provided as each stage is developed;
- the recommendations of the travel choice strategy is not supported as there is no access to Gledswood Hills by mass public transit and there is no plan to construct a rail link to Gledswood Hills, resulting in a higher dependency on private vehicles;
- the length of the right turn bay out of The Hermitage Way is 45 m however the queue length is proposed to be 92.2 m, therefore the right turn bay should be extended to accommodate the queue length as the length will also affect through traffic by blocking the through lane;
- consideration should be given to impacts on the intersections to the east of the development;
- intersection modelling should be provided based on the current road network without presuming upgrades have/will occur;
- the proposal should be designed above the Probable Maximum Flood (PMF) level and in accordance with Council's *Flood Risk Management Policy*, the *NSW Floodplain Development Manual 2005* and Council's Engineering Specifications;
- decommissioning and re-alignment of Council's stormwater drainage easement will need to be designed so there is no reduction or adverse impact to the pre-development conditions;
- further salinity investigation must be undertaken to the depth proposed by the development and if required appropriate mitigation requirements identified;
- the submitted Acoustic Report is considered inadequate as it fails to assess the following:
  - noise from mechanical plant equipment installed;
  - noise generated from a multi-storey carpark;
  - cumulative noise generated from surface car parking and the multi-storey carpark;
  - noise from the loading docks;
  - the assumption regarding number of vehicles using The Hermitage Way in the AM peak time in 2026 is considered to be understated at 66 vehicles;
  - the assessment of noise from the car park is based on 50 per cent usage which Council considers to be an underestimate;
  - the two-step process for sleep disturbance where internal noise levels below 50-55dB(A) are not considered to wake people is not considered acceptable. Council only accepts the L1-background +15dB(A);and
  - a construction noise management plan should be provided.

**EPA** provided the following comments for consideration:

- the Applicant should ensure compliance with the *Protection of the Environment Operations Act 1997*;

- construction activities should be carried out in a manner that minimises dust emissions and does not permit the emission of offensive odour beyond the boundary of the site;
- noise and vibration during construction should be managed in accordance with the *Interim Construction Noise Guideline (ICNG)*;
- construction and operational activities should ensure there is no pollution of either surface water or groundwater;
- the proposal should promote integrated water cycle management that optimises opportunities for sustainable water supply, wastewater and stormwater management, and reuse initiatives; and
- any waste stored or removed on site must comply with EPA legislation and guidelines.

**RFS** advised it did not have sufficient information to assess the application as it was unclear:

- who will take responsibility for maintenance of the adjoining riparian corridor once the land is transferred to Council; and
- whether the additional maintenance works outlined in the VMP will ensure the riparian corridor does not pose a future bushfire risk. On this basis, the RFS stated there was insufficient information to properly assess the potential bushfire hazard of the adjoining riparian corridor which may impact on any future development of the site.

**TfNSW** provided the following comments for consideration:

- that conditions be included requiring the provision of a footpath connection to the bus stops located adjacent to the hospital and preparation of a Green Travel Plan (GTP) that promotes public transport usage by hospital staff; and
- prior to commencement of work on the site, a Construction Traffic Management Plan (CTMP) be prepared taking into consideration the cumulative impacts of the proposed development and adjacent development on traffic, pedestrian, cyclists and bus services in the vicinity of the site. The CTMP must be prepared in consultation with Council, RMS and the local bus service provider.

**DPI** provided the following comments for consideration:

- the proposed riparian protection area in Management Zone 1 should be consistent with the requirements of the *Oran Park and Turner Road Waterfront Land Strategy 2009*;
- revegetation should be undertaken using local provenance vegetation and revegetated to a density that would occur naturally; and
- works on waterfront land, including outlet structures, should be consistent with the DPI Water Guidelines for Controlled Activities.

**OEH** noted that the proposed finished floor levels at the site are above the PMF level and 1 per cent annual exceedance probability. OEH recommended the proposed basement and multi-level carparks accord with Council's *Flood Risk Management Policy (April 2006)*.

**Sydney Water** advised that the drinking water main available for connection is the 150 mm main located on The Hermitage Way, and the wastewater main available for connection is the 300 mm main traversing the site.

**RMS** raised several concerns regarding errors with the SIDRA modelling submitted with the EIS (discussed further in **Section 3.5** and **4.2.2**).

**GSNSW** raised no issues with the proposal.

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

### 3.3. Organisation Submissions

Three submissions from organisations were received during the exhibition period. A summary of the concerns raised are provided below:

**Dart West Developments** supports the proposed CMC development as it increases the range of services available to Gledswood Hills and the wider Camden area.

**Greenfields Development Company No. 2** is generally supportive of the proposed CMC development as it increases the level of services available for future residents, however believes that the development would be better located in the Oran Park Town Centre as: it will be the future geographical centre of the local government area; is located near the junction of major roads; is accessible by public transport; and contains suitable built form parameters.

**SH Camden Valley Pty Limited** (Sekisui House) raised concerns that the section of The Hermitage Way located north of the intersection with Digitaria Drive will not be constructed prior to the delivery of the hospital and has requested that the entire length of The Hermitage Way be constructed prior to determination of the SSD application.

### 3.4. Public Submission

One public submission was received during the exhibition period, commenting on the following matters:

- potential for light spill from the proposal adversely affecting surrounding properties at night;
- adverse acoustic impacts resulting from ambulance sirens at night approaching the hospital, particularly once Gregory Hills Drive is operating at full capacity; and
- excessive traffic generated by the development.

### 3.5. Applicant's Response to Submissions

The Applicant has provided a response to submissions (RtS) including:

- responses to each concern raised by public authorities, Council, organisations and the public including specialist advice from the ecological and bushfire consultant, traffic consultant and acoustic consultant;
- a western perspective view of the CMC; and
- a comparative shadow analysis of the proposed CMC building envelope and a fully complying building envelope.

The Applicant's RtS was forwarded to Council, DPI, EPA, RFS, RMS and TfNSW. The **EPA** and **GSNSW** advised that they had no further comments on the proposal. **DPI** recommended that any works to be located within the riparian corridor associated with the proposal (including future stages) should be consistent with the *Oran Park and Turner Road Waterfront Land Strategy 2009*.

**TfNSW** advised that a pedestrian access review, GTP and CTMP should be prepared and submitted with any future development applications for the site.

**RMS** raised concerns regarding the revised traffic modelling as it continued to rely on outdated modelling, and advised that the traffic modelling should include the current year traffic conditions and a network model. In response, the Applicant's traffic consultant and RMS met to discuss traffic modelling associated with the proposal. The Applicant provided an addendum RtS with updated traffic modelling of the sensitivity test scenarios outlined in the Traffic Impact and Parking Assessment (TIPA) submitted with the EIS. In response to the addendum RtS, RMS requested the Applicant provide a copy of the travel surveys and raised concerns regarding inconsistencies between the traffic distribution assumptions advised in the TIPA and provided in the updated traffic modelling. The Department understands that further correspondence occurred between RMS and the Applicant's traffic consultant, with RMS accepting traffic modelling emailed by the Applicant's traffic consultant on 23 January 2017.

**Council** and **RFS** continued to raise concerns regarding the VMP applicable to the adjoining riparian corridor, with the RFS noting that multiple VMPs may apply within the riparian corridor with different levels of vegetation management. Council reiterated that the VMP which applies to the section of the riparian corridor adjacent to the site, is the VMP dated 24 April 2012. Subsequent amendments to the VMP, affected sections of the riparian corridor which are not directly adjacent to the site. In order to resolve the uncertainty regarding the applicable VMP, the Applicant lodged a Section 96 (s96) application to modify DA 277/2012. The s96 modification was approved by Council on 16 March 2017. The amended VMP, dated 6 November 2015 – amended February 2017 (final VMP), includes ongoing management requirements for the riparian corridor to ensure a bushfire threat is not created due to overgrowth. The Applicant has provided a letter from Council, advising that Council will continue maintenance of the riparian corridor as per requirements of the approved VMP once the riparian corridor has been dedicated to Council. RFS did not raise any objections to the final VMP.

## 4. ASSESSMENT

### 4.1. Section 79C Evaluation

**Table 3** identifies the matters for consideration under section 79C (see glossary at **Appendix C**) that apply to State significant development, in accordance with section 89H of the EP&A Act. The table represents a summary for which additional information and consideration is provided for in Section 4.2 (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 Applicant to consider these matters and those required to be considered in the SEARs and in accordance with the requirements of section 78(8A) of the EP&A Act and Schedule 2 of the EP&A Regulation.

**Table 3: Section 79C(1) Matters for Consideration**

Section 79C(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Complies - see <b>Appendix B</b>
(a)(ii) any proposed instrument	Not applicable
(a)(iii) any development control plan	See <b>Appendix B*</b>
(a)(iiia) any planning agreement	Not applicable
(a)(iv) the regulations	The SSD application satisfactorily meets the relevant requirements of the EP&A Regulation, including the procedures relating to DAs (Part 6 of the Regulation), public participation procedures for SSD's and schedule 2 of the Regulation relating to EIS. Refer to discussion at <b>Section 2.7</b> .
(a)(v) any coastal zone management plan	Not applicable
(b) the likely impacts of that development	Appropriately mitigated or conditioned - refer to <b>Section 4.2</b>
(c) the suitability of the site for the development	Suitable - Refer to Sections 2.8 and Section 5
(d) any submissions	Refer to <b>Sections 3.2</b> and <b>4.2</b>
(e) the public interest	Refer to <b>Section 4.2.4</b>
Biodiversity values exempt if: (a) On biodiversity certified land (b) Biobanking Statement exists	Not applicable

\* Under clause 11 of the SRD SEPP, DCPs do not apply to SSD. Notwithstanding, consideration has been given to relevant DCPs at Appendix B.

## 4.2. Key and Other Issues

The Department has considered the EIS, the issues raised in submissions and the Applicant's response to these issues in its assessment of the development. The Department considers the key issues to be:

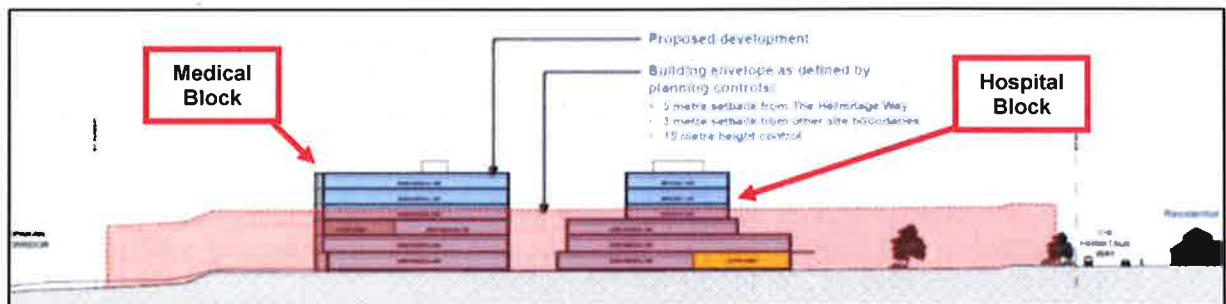
- built form and public domain;
- traffic and parking impacts;
- riparian corridor and bushfire risk; and
- acoustic impacts.

### 4.2.1. Built Form and Public Domain

#### **Built Form**

The CMC is proposed to have a maximum overall building height of 26.6 m to the top of the lift overrun for both the hospital block and medical block. The proposed multi-storey carpark will reach a maximum height of 22 m.

The proposed building envelopes would exceed the 15 m building height control as specified in clause 4.3(5) of the SRGC SEPP by up to 11.6 m. **Figure 10** illustrates the variation, noting that the red shading shows the 15 m building height control.



**Figure 10: Height of the proposed CMC building envelopes as compared with the SRGC SEPP height control (Source: Applicant's EIS)**

The Applicant relies on the provisions of clause 4.9 of the SRGC SEPP, which provides for exceptions to a development standard, and has subsequently prepared a written request that seeks exemption to the development standard for building height. The Applicant contends the building height development standard is not appropriate for the CMC and is unreasonable and unnecessary as:

- the objectives of the building height development standard is achieved as the proposal allows a more slender built form which provides a greater setback from site boundaries, thereby reducing building bulk, visual impact, overlooking and overshadowing of the surrounding residential dwellings;
- the additional floor space provided by the proposal allows for additional hospital beds to be provided leading to a direct public benefit; and
- a smaller building footprint allows for additional space around the site for parking and landscaping.

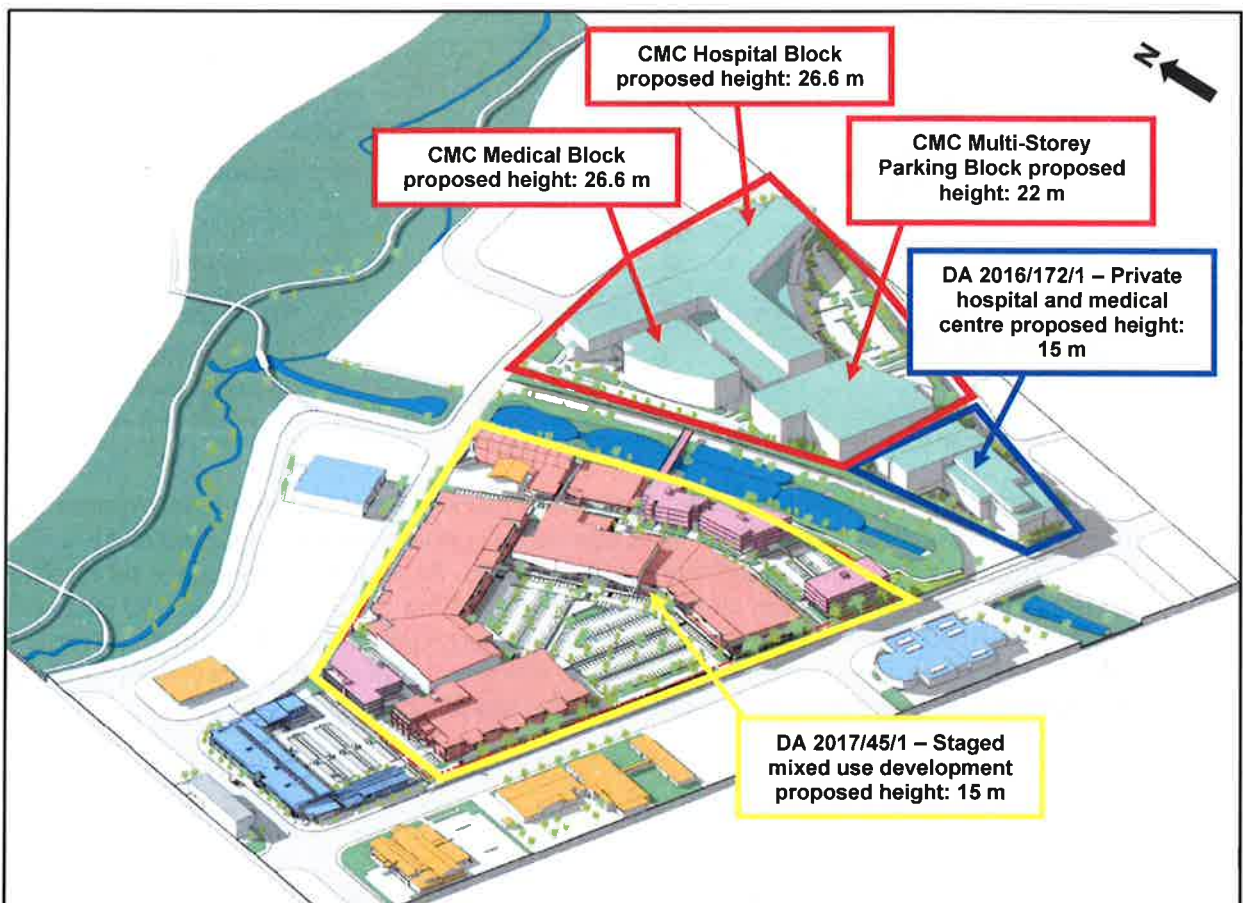
Council did not raise any specific objection to the proposed building heights, provided that resultant impacts on the amenity of residential properties to the east and south-east are carefully considered within the Department's assessment of the proposed development.

The Department acknowledges that the CMC would be highly visible and prominent along all street frontages, particularly along The Hermitage Way due to its interface with low density residential dwellings, which are typically one storey. The Hospital Block building envelope has been setback 27.5 m from the corner of The Hermitage Way and Digitaria Drive and between 6.5 m and 56.5 m from The Hermitage Way site boundary. The CMC will also be highly prominent when viewed from the riparian corridor adjoining the western site boundary. The

future multi-storey carpark building envelope will be setback a minimum of 6.45 m from the riparian corridor and the future Medical Block building envelope will be setback a minimum of 19.5 m from the riparian corridor.

As the hospital block has a staggered built form, the six storey component of the Hospital Block will be located more centrally on the development site and other than one small departure, the height of the Hospital Block building at the minimum site boundary setbacks is fully compliant with the SRGC SEPP building height development standard. The departure relates to a small component of the six-storey tower element of the Hospital Block which would project forward to the minimum setback along The Hermitage Way frontage.

The development site is located adjacent to land zoned B5, under the SRGC SEPP, to the north, south and west. The land to the west is subject to a current DA with Council (DA 2017/45/1) for the construction of a staged mixed use development up to four storeys in height. The land to the south is also subject to a current DA with Council (DA 2016/172/1) for the construction of a private hospital and medical centre up to four storeys in height. Refer to **Figure 11** for a proposed aerial view of DA 2017/45/1, which also includes block drawings of the proposed CMC and DA 2016/172/1.



**Figure 11: Aerial perspective of DA 2017/45/1 and surrounding sites** (Source: AN+A Architects sourced from Camden Council's website)

The Department notes the proposed built form of both DA 2017/45/1 and DA 2016/172/1 are four storeys in height and comply with the maximum height provision of 15 m in the SRGC SEPP. Based on current DA's lodged or approved to date, the proposal will be the tallest development in the immediate locality. The Department also notes that the TRDCP 2006 initially anticipated the construction of a road between the development site and adjoining property to the south (refer to **Figure 12** below). However, subsequent development approvals issued by the Council for the GHCP have facilitated several departures from the future layout envisioned for the locality. Whilst the through road is no longer provided for as part of the two

sites, the seven-metre setback to the southern boundary provided by the building envelope of the multi-storey parking block allows for a separation between the two sites envisioned by the TRDCP 2006 and exceeds the 3 m minimum setback under the TRDCP 2006.

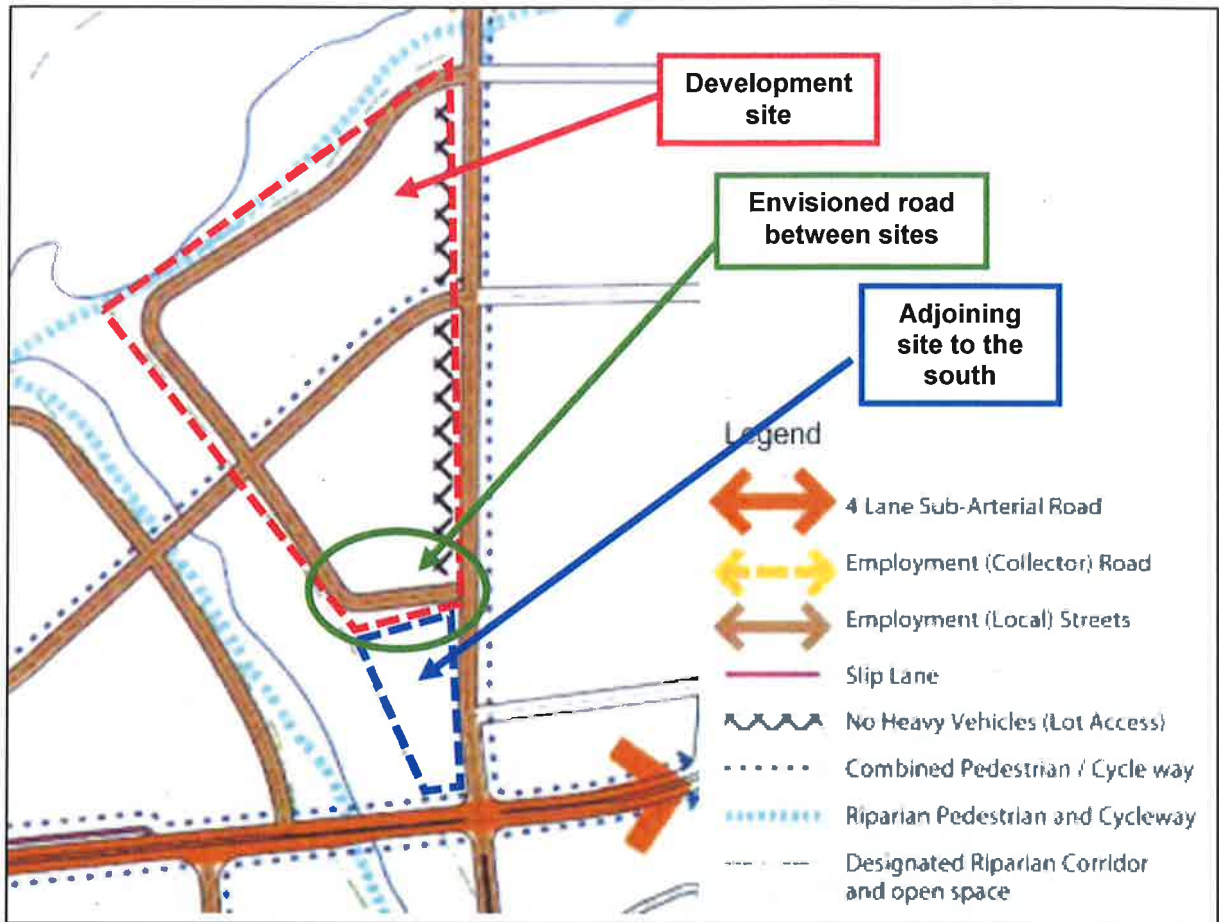
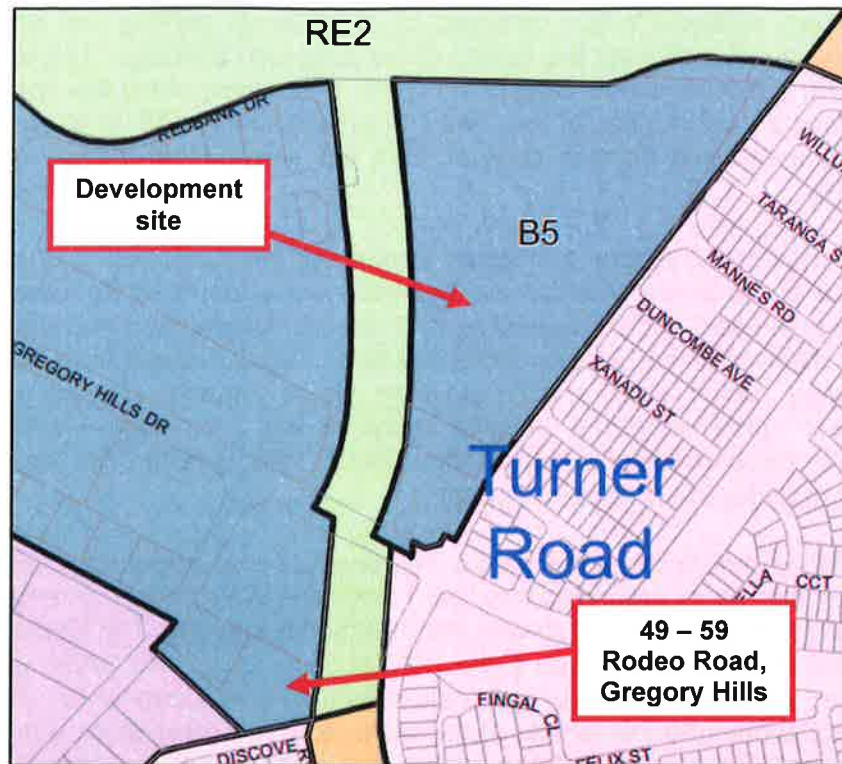


Figure 12: TRDCP 2006 Movement Plan (Source: DP&E website)

The Department notes that the Joint Regional Planning Plan has previously granted consent for DA1088/2014 on 11 May 2015 for a four-storey private hospital, located at 49 – 59 Rodeo Road, Gregory Hills, with a building height of 20.6m. As with the CMC, 49 – 59 Rodeo Road, Gregory Hills is subject to the clause 4.3(5) of the of the SRGC SEPP as it is land zoned B5 under the SRGC SEPP with a frontage to land zoned RE2 Private Recreation (refer to **Figure 13**). As such, the Department notes that a consent authority has previously allowed for a variation to the height of buildings development standard.



**Figure 13: Land zone map identifying location of 49-59 Rodeo Road, Gregory Hills** (Source: SRGC SEPP)

The Applicant has submitted indicative perspectives of the proposal when viewed from The Hermitage Way and the riparian corridor (refer to **Figure 8** above and **Figure 14**). The perspectives indicate that the Hospital Block will potentially include a high level of glazing to aid in interacting with the surrounding area and soften the bulk of the building. The facade of the hospital and multi-storey parking blocks can be further softened by the horizontal banding provided to identify the top of the podium level and each of the three storeys above the podium. Vertical coloured glazing panels are provided intermittently on the first two storeys of the hospital block and a two storey L-shaped designed panel structure identifying the patient drop-off area, both providing visual interest to the façade. The façade of the multi-storey carpark will provide contemporary design and screen the internal operations of the carpark (refer to **Figure 8**). It is anticipated that the treatment around the entire façade would also reduce light spill whilst also maintaining transparency and natural ventilation.



**Figure 14: Western perspective view of the CMC** (Source: Applicant's Rts)

Note: the building envelope of the Medical Block and at-grade parking layout is incorrect in this perspective view as the perspective identifies a different parking layout and a medical block which is only two storeys in height instead of six storeys as proposed.

Site boundary setbacks will be occupied by at-grade car parking and landscaping, which will also aid in visually softening the setting of the proposed buildings. The Department considers landscaping within the site boundary setbacks, particularly along the riparian corridor, will aid in reinforcing the boundaries of the CMC site while also allowing for passive surveillance of the carparking areas and riparian corridor from the surrounding streets and within the CMC, respectively.

The Department considers the visual impact of the proposed building envelopes to be acceptable as the built elements have been setback adequately from the sensitive residential land uses to the east and south-east to minimise overlooking and overshadowing. Additionally, the tower element of the Hospital Block has been further setback from the edge of the podium levels below, which also reduces adverse visual impacts created by the building. The Department notes while the building footprint and envelopes identified are considered acceptable, the architectural details conveyed in the plans are not for consideration by the Department under the concept proposal.

The indicative perspectives submitted demonstrate that adequate building articulation and modulation can be incorporated into The Hermitage Way façade to reduce the perception of bulk when the development is viewed from surrounding areas. The Department considers that subsequent DAs for construction of the CMC should incorporate further horizontal and vertical articulation, via the built form or materials selection, particularly to the Digitaria Drive façade, the Medical Block and the façade of the Multi-storey Parking Block addressing the southern site boundary. To ensure that the articulation and modulation presented in the indicative perspectives are reflected and further explored in the detailed development plans submitted for construction of the future CMC, the Department has recommended that future development applications include an architectural design statements explaining how the bulk and scale of the CMC has been alleviated through the design of the buildings.

Partly in response to the orientation of the site, the proposed building envelopes are sited toward the centre of the site, reducing overshadowing impacts to the adjoining riparian corridor to the west and residential properties to the east. The building envelopes will overshadow some residential dwellings between 12 pm and 3 pm in mid-winter, as shown in **Figure 15**. Overshadowing of a portion of the riparian corridor and adjoining site to the south (also proposed for a hospital) will occur between 9 am and 12 pm. The proposal will not unreasonably overshadow surrounding properties, with each property continuing to receive at least three hours of sunlight to living areas between 9 am and 3 pm during the winter solstice.



**Figure 15: Winter solstice shadow diagrams** (Source: Applicant's EIS)

The Applicant has also undertaken a comparative solar access analysis of the proposal and a fully compliant built form (refer to **Figure 16** below). The analysis demonstrates that at 3 pm in mid-winter, a compliant built form would cast more shadow on residential properties to the east and south-east than the proposed development. This is a result of the reduced site boundary setbacks required by the TRDCP 2007. The proposed CMC built form incorporates setbacks between 1.5 m and 51.5 m in excess of the minimum five metres required by the TRDCP 2007.

To ensure the final detailed design of the CMC will continue to provide an acceptable solar access outcome to the residential properties to the east and south-east, the Department has recommended a condition requiring that the final design of the CMC does not overshadow the residential properties for more than three hours between 9 am and 3 pm on June 21.



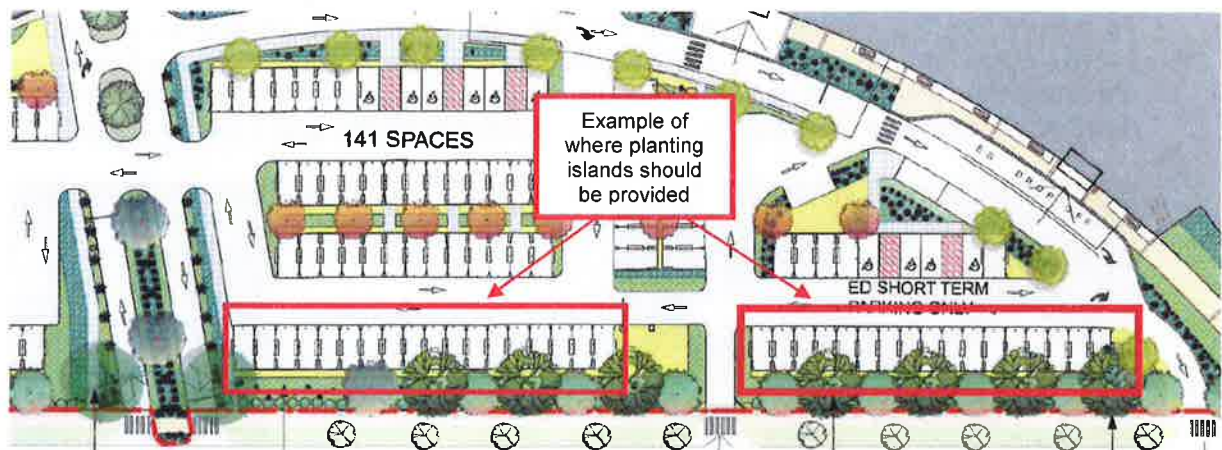
**Figure 16: Overshadowing comparison of a compliant building footprint (overshadowing shown in red) and the proposed building footprint (shown in yellow) (Source: Applicant's EIS)**

The Department is satisfied that strict compliance with the building height development standard in the SRGC SEPP would be unreasonable and unnecessary in this instance, in that it would potentially result in a development with reduced landscaping and increased overshadowing. The Department is also of the opinion that there would be minimal public benefit in maintaining the development standard given that it would reduce the number of hospital beds available for the community. The Department is satisfied that there are sufficient environmental planning grounds to support the variation as the impacts of the development can be adequately mitigated and/or managed. The Department has assessed the impacts of the proposed building height on the residential properties to be east and south-east, as requested by Council, and considers the visual and solar impacts to be manageable through the proposed landscaping or recommended conditions and acceptable, respectively. The Department therefore concludes that the massing of the proposed building envelopes, in combination with the proposed building layouts, is appropriate for the site.

### **Public Domain and Landscaping**

The EIS application seeks approval for future landscaping works generally located between the building line and the site boundaries. Landscaping works will comprise soft landscaping, including groundcovers, shrubs and trees, and hard landscaping elements, including paving, water features and seating.

The Department considers that landscaping has been used to soften the development and create visual interest when viewed: externally, via inclusion of canopy trees planted around the site perimeter; and internally, through raised planter beds and shade tolerant planting in the walkway between the medical and hospital blocks to create smaller scale spaces for employees, visitors and patients. Soft landscaping also aids in wayfinding for the public entrances to the CMC as large iconic trees are proposed to be planted on either side of the main public vehicle entrances along Digitaria Drive and The Hermitage Way. Landscaping has also generally been provided surrounding the perimeter of the at-grade parking areas, however the Department notes that planting islands have not been utilised to create a visual break or increase amenity in the larger rows of car parking spaces (refer to **Figure 17**). The Department has recommended a condition requiring the provision of one planting island for every ten adjoining car parking spaces located in the at-grade parking areas.



**Figure 17: Example where plant islands can be provided** (Source: Applicant's EIS)

The proposal also includes a walkway and seating adjacent to the riparian corridor to aid in activating and utilising views associated with the adjoining waterway. The pathway will also connect to a walkway proposed to be developed as part of the application (DA 2017/45/1) for the site adjacent to the western boundary of the CMC (refer to **Figure 11**). The adjoining riparian corridor has also been incorporated into the landscaping for the site, through inclusion of a water feature adjacent to the western façade of the multi-storey carpark. The water feature will include stepping stones and will be connected to the multi-storey carpark to utilise runoff from the carpark's roof.

Council requested that a minimum landscaped buffer of two metres be provided along the western site boundary. As noted by the Applicant, the proposal includes a landscaped buffer, incorporating turf, shrubs and trees, varying in width between one and four metres (refer to **Figure 18**). The Department considers the provided landscaped buffer to be adequate, noting that locations where the buffer is below two metres in width will accommodate public seating.



Figure 18: Varying size of landscaped buffer provided along western boundary (Source: Applicant's EIS)

The Department notes that the Landscape Plan identifies, via an annotation, that canopy trees will be provided between the Multi-storey Parking Block and the southern site boundary however the landscaping provided is identified as shrubs on the plan legend. The Department has recommended a condition that the final detailed design of the Multi-storey Parking Block be provided with sufficient setback area from the southern boundary or the planting of canopy trees in the building line setback. The Department also considers that the at-grade parking spaces require planting islands between the parking spaces at a rate of one in every ten car parking spaces. The Department also requires that the future CMC DA detail how it will facilitate the pedestrian bridge proposed as part of DA2017/45/1 and as shown under the TRDCP 2006. Finally, the Department considers that the loading bay and service area adjacent to Digitaria Drive should be provided with screening to ensure that the loading facilities are not visible from the public domain. Appropriate conditions have been recommended to this effect.

The Department is satisfied that the proposed landscape works compliments the design of the CMC and aids in wayfinding for the CMC, subject to the conditions recommended.

#### 4.2.2. Traffic and Parking

##### **Traffic Impacts**

##### Construction Traffic

The TIPAs submitted as part of the EIS included a high-level review of construction traffic associated with the CMC. A detailed review of construction traffic management will be undertaken during the subsequent DAs for the construction of each component of the CMC. The high level review of construction traffic included a range of construction traffic management principles including: predominately limiting access to site from The Hermitage Way and Gregory Hills Drive and restricting access from Digitaria Drive; minimising on-street

parking from construction workers through encouraging opportunities to cycle and utilising public transport; use of appropriate traffic control measures to limit impact on the public domain; planning works which impact the surrounding roads systems (i.e. deliveries) to minimise impact on commuter peak periods; and continued pedestrian access to The Hermitage Way and Digitaria Drive during construction.

TfNSW noted that construction of the CMC will likely occur at the same time as other development in the Gledswood Hills area and surrounding suburbs, and therefore the cumulative impact of construction trucks has the potential to impact on traffic operations of bus services on the road network and safety of pedestrians and cyclists. TfNSW has requested that the Applicant be required to provide a draft CTMP as part of the DA for construction. Council did not raise any concerns regarding construction traffic associated with the CMC.

The Department notes that the proposal is for concept approval for the CMC, and details regarding construction of the site have not yet been finalised. Further, the Department notes that as the final breakdown of the stages has not been determined, the final construction details, particularly relating to truck movements, cannot be finalised. Notwithstanding, as requested by TfNSW, the Department has recommended a condition requiring the submission of a preliminary CTMP with the future DAs for the design and construction of the CMC.

#### Operational Traffic

The TIPA indicates that based on the *RMS Guide To Traffic Generating Developments 2002* (GTGD), the CMC will potentially generate 194 trips in and 65 trips out during the AM peak, and 83 trips in and 333 trips out during the PM peak. However, based on the sensitivity testing traffic generation rates (which reviews the total number of parking spaces required to accommodate peak on-site demand based on the hospital facilities, including beds, seats and rooms and staffing levels), the CMC will potentially generate 558 trips in and 174 trips out during the AM peak, and 85 trips in and 374 trips out during the PM peak.

The total daily traffic generation for the proposed development was calculated based on expected daily patient and visitor turnover and staff shift changeover periods. This approach adopted the traffic generation data used for the sensitivity test, and resulted in a total of 5,651 daily vehicle trips.

The TIPA also reviewed mode share projections for the proposed development by studying the mode share characteristics for other similar and more established land use activity areas nearby. Campbelltown was used for comparison purposes due to the presence of a hospital and similar surrounding land uses, and the study identified that 90 per cent of the journey to work mode share was by car, followed by 7 per cent by bus, 2 per cent by walking and 1 per cent by cycling.

The original traffic advice submitted as part of the EIS for the subject SSD application indicated that all intersections would perform at either LoS A, B or C.

Council and RMS raised concerns regarding the traffic modelling provided in the original TIPA. RMS provided a range of updates required for the SIDRA modelling and commented that as modelling was not undertaken for the current year it was not possible to compare the impact of the proposal with the current conditions. Additionally, concern was also raised as the intersections were modelled in isolation rather than within a network. Council noted that intersection analysis provided is inconsistent with the analysis provided in previous applications in the locality.

Council and RMS continued to raise concerns with the revised traffic modelling provided in the RtS. RMS advised that they did not support the application in its current form as the Applicant had not addressed matters raised in its original submission. Council noted that there were anomalies within the traffic modelling. The Applicant and RMS discussed matters relating to

the traffic modelling, as outlined further in **Section 3.5**, with RMS advising the Department that the traffic modelling dated 23 January 2017 was acceptable.

The addendum traffic advice (dated 21 February 2017) provided with the updated traffic modelling now takes into consideration current background traffic levels, modelling the intersections as part of a network and adjusted signal phasing requested by RMS, indicates that the Gregory Hills Drive/Camden Valley Way intersection will operate at a LoS F (over capacity) in all future scenarios both with and without the proposed development. The proposal will add between 1.8 seconds during the AM peak in the 2036 scenario to 5.1 seconds in the PM peak in the 2036 scenario.

The Gregory Hills Drive/Central Hills Drive intersection will operate at LoS B (good level with acceptable delays) during the 2031 scenario without the development and LoS D (operating near capacity) during the 2036 scenario without the development. The 2031 LoS with the development will continue to stay at LoS B during the morning peak, however will increase to LoS C (satisfactory) during the PM peak with an increase in delay of 13.1 seconds. The 2036 scenario will stay at the pre-development levels during the AM peak however will increase to LoS E during the PM peak with an increase in delay times by 22.7 seconds. The addendum traffic advice states that the 2036 scenarios presented are a sensitivity test only to demonstrate the potential road network operation for information purposes. The CMC is expected to be fully developed by 2031, at which point the surrounding intersections (with the exception of Gregory Hills Drive/Camden Valley Way) operate at a satisfactory LoS.

The Gregory Hills Drive/The Hermitage Way intersection will operate at an overall LoS B at both pre-development levels in the 2031 and 2036 scenarios. The intersection will continue to perform at LoS B post-development in the 2031 scenario and during the AM peak in the 2036 scenario. The intersection will increase to LoS C during the PM peak in the 2036 scenario.

The TIPAs notes the surrounding road network has experienced significant road capacity upgrade works to accommodate the increase in population predicted for the South-West region. These works include the addition of two lanes to Camden Valley Way incorporating a median strip large enough to accommodate two further lanes in the future and the addition of a shared path network and high quality footpaths to promote walking and cycling. The TIPAs recommends that the link between Gregory Hills and Campbelltown be constructed as early as possible to ensure that access to the emerging suburb by car, bus, walking and cycling from the east can be achieved. The extension works will be undertaken as part of a Voluntary Planning Agreement between other developers in the precinct, RMS and the Department by 2026.

The Department notes that the Gregory Hills Drive/Camden Valley Way intersection will operate at a LoS F in the 2031 and 2036 scenarios irrespective of whether the CMC is developed. The CMC will lead to an increase in delay times for this intersection, however the Department considers these delays to be relatively minor noting that they average between 1.8 seconds and 5.1 seconds over both scenarios. The 2036 sensitivity testing undertaken for Gregory Hills Drive/Central Hills Drive intersection indicates that the CMC will cause a 22.7 second delay at the intersection during the peak period resulting in the intersection operating at a LoS E. The Department notes that the Applicant has advised that the sensitivity testing is for informational purposes only, however the TIPAs indicates that sensitivity testing incorporates data relating to the expected operational characteristics of the proposed development. While it is noted that RMS did not raise any concerns related the operation of any intersection, the Department considers it appropriate that a recommended condition of consent be included requiring the Applicant consult with RMS and Council regarding whether any intersection upgrades are required to maintain operation of the Gregory Hills Drive/Central Hills Drive intersection to a pre-development LoS. If intersection upgrades are required, the Applicant is required to provide written evidence demonstrating that RMS and Council are satisfied with the scope of proposed upgrades required with the Stage 1 DA.

### **Parking**

The TIPA indicates that a minimum of 585 car parking spaces would be required for fulfil the requirements of the RMS GTGD. Taking into consideration the hospital's facilities and indicative staffing, patient and visitor levels, the TIPA also undertook a sensitivity test to determine the total number of parking spaces required to accommodate peak on-site demand. The results of the sensitivity test found that peak parking was to occur during the AM peak period and that the CMC would require 1,001 parking spaces to accommodate peak usage.

The proposal provides for a future total of 1,080 car parking spaces, comprising a mixture of at-grade parking, basement parking and a multi-storey carpark which be provided progressively along with the construction of the CMC stages. The Applicant has not indicated whether a fee will be charged for on-site parking.

Council did not have any concerns regarding the number of the car parking spaces provided, however commented that the number of accessible car parking spaces should be in accordance with the requirements of the NCC and that each stage of the development should have sufficient parking to accommodate usage generated by that stage. The Applicant has advised that accessible parking will be provided in excess of minimum requirements and that each development application will be accompanied by parking requirements needed for the proposed number of additional staff, patients and visitors.

The Department considers the number of car parking spaces provided to be acceptable, noting that the figure has been determined based on the operational requirements of the hospital. Additionally, while proposed number of spaces is in excess of the estimated demand, the site is located in a 'greenfield' development area with a limited public transport (bus) network. Further, the number of spaces proposed in the concept proposal is a maximum figure, and the final car parking arrangements will be confirmed in subsequent development applications, outlining the parking demand for each stage and the final location of the spaces on the subject site. However, in order to promote alternative modes of transport (other than the car) for staff in travelling to and from the CMC, the Department has recommended a condition of consent requiring the Applicant submit a GTP with the development application for Stage 1 of the development, to be updated in each subsequent stage. The Department has also recommended a condition requiring details of any proposed on-site parking fees be provided with the Stage 1 DA to aid in the assessment of the likelihood of car parking being pushed onto the surrounding road network as a result of parking fees.

### **Vehicular Access**

Multiple access points are proposed to the CMC from The Hermitage Way and Digitaria Drive. The main access to the CMC will be located on The Hermitage Way via separate ingress and egress driveways. A separate emergency entrance is also located off The Hermitage Way, with a separate exit located further north along The Hermitage Way. Service vehicles and ambulance access is provided via separate entry and exit driveways along Digitaria Drive and a shared entry and exit driveway for access to the car parking areas located adjacent to the western site boundary. Refer to **Figure 7** for the proposed site layout.

Access to the parking areas will be controlled via boom gates with the exception of the emergency access points. The Applicant advised that a high level appraisal undertaken indicated that there is sufficient area to accommodate queuing to the main access point at The Hermitage Way and that detailed reviews will be undertaken during subsequent development applications.

Council raised concerns that the number of access points to the CMC was excessive and may create confusion for drivers resulting in potentially dangerous driving situations on the road network. The Applicant responded that access arrangements proposed allow for different uses to be segregated and results in a controlled environment for the hospital.

The Department considers that the number of access points provided allows for efficient access to the site for emergency vehicles separate from the general public and service vehicles noting that the Applicant has advised this is an operational need for CMC. Additionally, wayfinding is aided through the planting of distinctive trees at the main public (non-emergency) vehicle entries and signage, which is to be detailed in the future DA for the design and construction of the private hospital. The Department has recommended a condition to this effect.

To ensure the queueing spaces provided is adequate for the CMC, the Department has recommended a condition that the DA for the first stage of the campus include a detailed assessment demonstrating that queueing can be accommodated on the site.

#### **4.2.3. Riparian Corridor and Bushfire Risk**

The site adjoins a nominated riparian corridor along the western site boundary. The riparian corridor and associated original VMP, dated February 2012, was created through a local development consent (DA 277/2012). In addition to the creation of the riparian corridor, this DA also included the lot layout of the GHCP, drainage works, landscaping and indicative uses. The subject SSD site was originally identified to be used for future commercial uses.

The February 2012 VMP included planting of the adjacent riparian corridor to its natural state inclusive of shrubs and trees. The density and type of planting constituted a 'low hazard vegetation' under *Planning for Bushfire Protection 2006* requiring a 10 m asset protection zone (APZ) along the western boundary of the CMC site. This APZ was based on use of the site for commercial purposes, which is not classified as a 'special fire protection purpose' (SFPP).

The Applicant advised that through approvals issued for construction certificates associated with applications for the GHCP, two amended VMPs dated February 2015 and November 2015 had been approved replacing the original VMP for various sections of the riparian corridor. Both these updated VMPs include modifications to the planting design and densities to ensure that the riparian corridor would not pose a future bushfire threat and therefore would not require an APZ. Both updated VMPs also included additional maintenance requirements, which are required to be undertaken in perpetuity after the riparian corridor is dedicated to Council, to ensure that the riparian corridor does not develop into a bushfire threat through overgrowth.

Through consultation associated with the SSD application, Council advised that: the majority of the riparian corridor adjacent to the CMC site was governed by the original February 2012 VMP; a portion near the southern section of the site was governed by the February 2015 VMP; and a portion near the northern section of the site was not governed by a VMP. The RFS raised concerns regarding uncertainty surrounding the applicable VMP and commented that as the intended use of the site has changed from commercial to a hospital (which is classified as a SFPP), an APZ in the vicinity of 60 m would be required due to the bushfire hazard created from the February 2012 VMP. Additionally, confirmation would be required that Council is willing to undertake the maintenance works associated with the February and November 2015 VMP.

DPI raised concerns that the November 2015 VMP, included for informational purposes in the EIS, did not comply with the requirements of the *Oran Park and Turner Road Waterfront Land Strategy 2009* regarding the size of the riparian corridor and proposed planting density. The Department notes that the proposal does not include any amendments or changes to any of the VMPs which have been assessed and endorsed through a separate development application.

Through the addendum RtS, the Applicant advised that a s96 modification application had been lodged with Council to amend the consent for DA 277/2012 to change each applicable VMP along the riparian corridor to the final VMP, dated 'November 2015 – Amended February 2017', to eliminate any confusion in relation to the VMP applicable to the riparian corridor.

Council approved the modification application on 16 March 2017. The final VMP includes modified planting schedules and locations to ensure a bushfire hazard is not created. Additionally, the final VMP includes an additional maintenance schedule, to be undertaken in perpetuity, to ensure that a bushfire hazard is not created through the regrowth and spread of the vegetation. The Applicant has provided a letter from Council advising that Council is prepared to undertake the required additional maintenance works outlined in the final VMP once the riparian corridor has been formally dedicated to Council. The RFS has subsequently confirmed that no objections are raised to the proposal subject to the Department being satisfied that a bushfire threat will not be created in the adjoining riparian corridor.

The Department considers that the matters relating to the potential creation of a bushfire threat, due to the vegetation associated with the riparian corridor, have been adequately addressed through the s96 approval, substituting the original VMPs with the final VMP. The final VMP incorporates measures such as sufficient distance between plants, plant selection and density, to ensure that a bushfire threat is not created due to the initial vegetation associated with the VMP. The final VMP also includes an additional maintenance schedule to be undertaken in perpetuity to ensure that a bushfire hazard is not created due to overgrowth of the vegetation in the riparian corridor. As the Applicant has provided a letter from Council confirming that Council will continue maintenance of the riparian corridor once the land is dedicated to Council, the Department is satisfied that a bushfire threat will not be created in the future. The Department has recommended a condition requiring the Applicant provide details of any access arrangements it will need to provide to Council to continue the in-perpetuity maintenance required as part of the final VMP in the Stage 1 DA for the construction of the CMC.

As timing surrounding the implementation of the VMP has not been confirmed, the Department has recommended a condition of consent requiring advice be provided with the DA for Stage 1 of the CMC on whether maintenance of the riparian corridor is required during any interim period (between occupation of the first stage of the CMC and commencement of the VMP) so as not to create a bushfire hazard.

#### **4.2.4. Acoustic Impacts**

The proposal is accompanied by an Acoustic Impact Assessment (AIA), addressing external noise intrusion and potential noise and vibration impacts associated with the operation of the CMC on surrounding residential dwellings. As the application is for a concept proposal only and no actual works, noise impacts resulting from the construction of the CMC will be addressed in future development applications for individual stages.

##### External noise intrusion

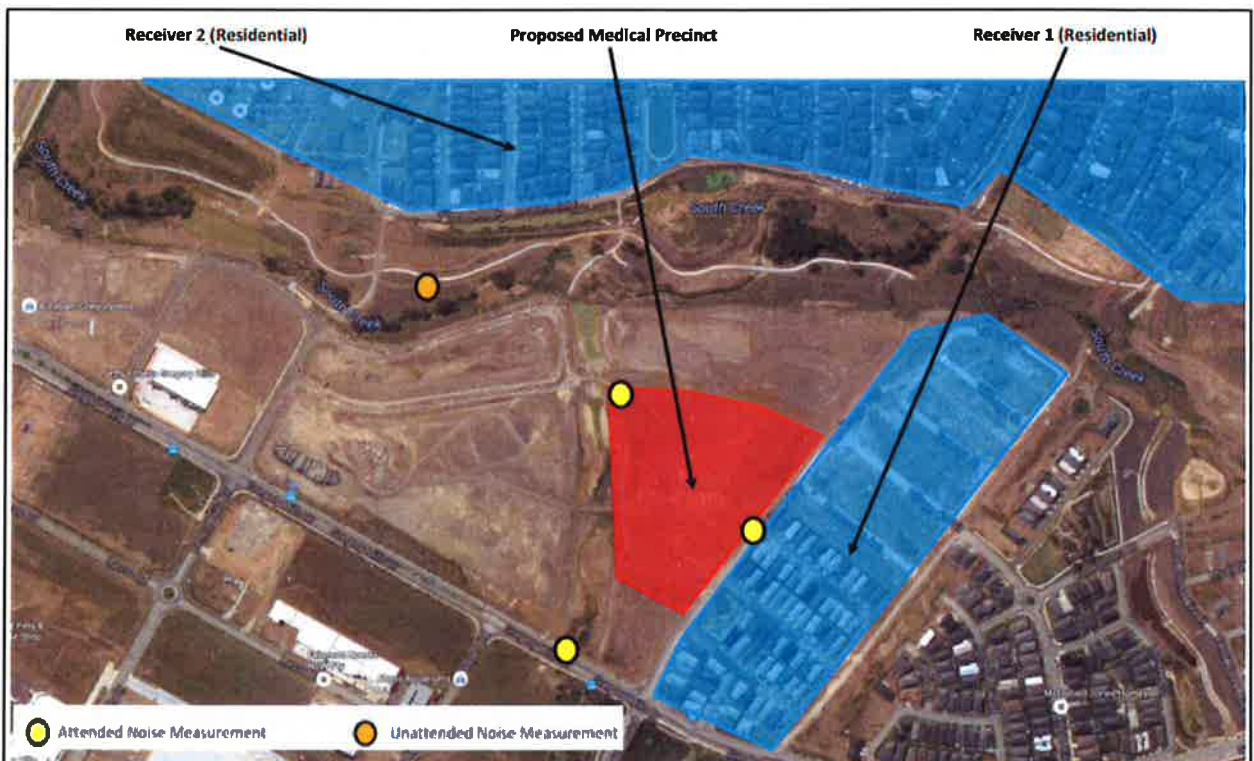
Noise emitted from future roads has been based on expected traffic volumes predicted in the submitted TIPA. The AIA found that as it was likely that external walls of the future CMC will be constructed of masonry, noise transfer from external sources will primarily occur through windows and external doors of the future CMC. The AIA recommends a range of design and construction methods be undertaken, including window and external glass doors glazing and mechanical ventilation, which will satisfy acoustic requirements for the CMC. The AIA advised that further detailed assessment of external noise intrusion will be undertaken during the detailed design stages.

The Department notes that the final traffic modelling accepted by RMS included minor changes to the predicted traffic volumes, however the final design of the CMC has not been determined and the AIA advises there is a range of design and construction methods available to limit external noise intrusion. The Department has recommended a condition requiring a Noise Impact Assessment be submitted with subsequent stages identifying noise impacts and mitigations measures to ensure compliance with the EPA *Industrial Noise Policy* (INP) and ICNG and that the final design of the CMC incorporate the recommendations of the AIA where required.

### Noise and vibration impacts to surrounding residential uses

As the detail of the future mechanical plant required for the proposed development is not known at this stage, the AIA recommends that a detailed noise impact review be undertaken as part of the development application for the individual stages. The AIA advises that satisfactory noise levels can be achieved through appropriate plant selection, location and standard acoustic treatments to mechanical services.

Operational noise impacts to surrounding residential properties will also be generated from the driveway and at-grade car parking through vehicles entering and exiting the site, manoeuvring within the carpark and occupants entering and exiting vehicles. As the closest existing residential properties are located north and east of the CMC (identified in blue in **Figure 19** below), noise monitoring equipment was placed in or near these locations to measure background noise levels.



**Figure 19: Nearest sensitive residential receivers and noise measurement locations** (Source: Applicant's EIS)

The AIA utilised noise emission levels from similar facilities in order to determine the potential noise impacts generated from the driveway and at-grade car parking areas. Noise emissions for the CMC were also predicted based on the assumption that the at-grade carpark will hold a maximum of 211 vehicles at any one time, and that 50 per cent of the carpark spaces will be occupied or vacated during a one-hour time period. The noise generated from the multi-storey carpark was not included in calculations, as this structure is proposed to be fully enclosed and its internal operation will therefore generate minimal noise.

Taking into consideration the building height of existing dwellings and boundary fencing heights, noise measurements show compliance with the INP intrusiveness criteria, as shown in **Figure 20** below.

Receiver	Predicted Noise Level	Criteria	Compliance
Receiver 1 and 2 (See figure 1)	42 dB(A) <sub>Leq</sub>	Day – 49 dB(A) <sub>Leq</sub>	Yes
	42 dB(A) <sub>Leq</sub>	Evening- 44 dB(A) <sub>Leq</sub>	Yes
	39 dB(A) <sub>Leq</sub>	Night – 40 dB(A) <sub>Leq</sub>	Yes*

\*No detailed traffic movement data available at this stage, it is reasonably assume that the vehicle movements during night time period will be half of day time period.

**Figure 20: Predicted noise levels generated from at-grade car park** (Source: Applicant's EIS)

Sleep disturbance testing has been undertaken using both the two step method and the L1-background +15 dB(A) method. The background noise level for the night period (between 10 pm and 7 am) is to be 35 dB(A), the intrusiveness criteria is 40 dB(A) and a EPA INP sleep disturbance level of 50 dB(A). The AIA notes that there is no detailed traffic movement data available at this stage of the development, therefore considers it reasonable to base night time movements on half of the day time period. As noted within **Figure 20**, the night time predicted noise level is 39 dB(A).

One public submission raised concerns regarding the impact of ambulance sirens approaching the CMC at night and the potential for sleep disturbance. The AIA advises that noise generated from emergency vehicles is not subject to the noise emission requirements of the EPA INP however, the AIA notes that ambulance sirens are not typically used within hospital sites with the exception of short bursts to alert motorists, which are expected to be minimal during night time periods.

Council raised concern that assessment of the operational noise impacts associated with the chosen mechanical plant, multi-level car park and loading docks have not been included in the AIA. Additionally, concern was raised regarding the assumption that only 50 per cent of spaces being used in the carpark is an underestimate. The Applicant responded to concerns raised by Council in the RtS and addendum RtS advising: that plant selection has not been selected as the proposal is only for concept approval; noise from within the multi-storey carpark will not affect sensitive receivers as it will be enclosed; and that as operational details are unknown at this stage, noise generated from the loading docks will be assessed in future DAs. In relation to usage assumptions of the car parking areas, the Applicant's acoustic consultant clarified that this prediction meant that in the space of one hour, 50 per cent of the vehicles would enter and leave in that same hour (i.e. turnover).

The Department acknowledges that the SSD application is only for concept approval of the CMC and as such, construction and operational noise levels will be refined during the detailed design of each staged application. The submitted AIA includes a range of recommendations for glazing, ceiling construction, ventilation, external wall construction and operation of the CMC to aid in reducing noise intrusion and extrusion to levels as per the EPA's INP. The Department has recommended a condition that requires the Applicant incorporate the recommendations outlined in the AIA into the detailed design of future development applications as relevant. Additionally, the future development applications are also required to be accompanied by a noise impact assessment identifying current background noise levels to existing and any new sensitive receivers, appropriate detailed noise modelling and required mitigation measures to ensure that requirements of the EPA's INP and ICNG are achieved during future construction and operation of the CMC.

#### **4.2.5. Other Matters**

##### **Contamination**

A Phase 2 Contamination report was undertaken as part of the assessment for the subdivision of the wider GHCP development under development application DA 277/2012. As future use of the site as a health services facility was not envisaged, fill material imported and used on the site was for future commercial/industrial land uses.

The Environmental Investigation (EI) undertaken for the site as part of this application investigated whether the site was suitable for development as a health services facility. The EI concluded that: the potential for significant chemical contamination arising from the historic use of the site was low; the concentrations of chemical contamination did not pose unacceptable risk to human or ecological health; and asbestos was not observed within any of the boreholes. The EI concluded that the site is suitable for the proposed health services facility land use.

The Department is satisfied the Applicant has adequately addressed the contamination requirements in SEPP 55 and the site is suitable for its intended use.

##### **Stormwater Easement**

A stormwater easement for drainage, benefiting Council, traverses the width of the site from the east to west boundary adjacent to the southern site boundary. The Applicant will be required to relocate the easement to facilitate construction of the proposed CMC. The Applicant's stormwater consultant has advised that the easement and associated infrastructure is to be relocated to align with the current site boundaries.

Council has indicated that the Applicant will need to engage in negotiations with Council and apply for the relevant applications in order to facilitate the relocation of the easement. Noting that this proposal is for only concept approval, the Department has recommended a condition requiring consent for the relocation of the easement be obtained prior to lodgement of the future development application for the design and construction of the first stage of the CMC.

##### **Public interest**

The proposal is considered to be in the public interest as it would provide the following public benefits.

- provision of contemporary health service facilities to cater for the current and future demands for medical services in the South-West Sydney region;
- creation of 400 jobs throughout the construction of the CMC and 800 direct jobs once the CMC is fully operational; and
- delivering a development incorporating ESD principles to improve inter-generational equity and satisfy the precautionary principle.

## **5. CONCLUSION**

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The Department has carefully assessed the merits of the proposal, taking into consideration the issues raised in submissions, and is satisfied that the impacts of the proposal are satisfactorily addressed in the Applicant's EIS, RtS, addendum RtS or through the Department's recommended conditions.

The application is consistent with the objects of the EP&A Act (including ecologically sustainable development) and is consistent with the State's strategic planning objectives for the State's strategic planning objectives for the site as set out in the *NSW State Priorities, A Plan for Growing Sydney* and the Greater Sydney Commission's draft *South West District Plan* as the proposal would provide significant public benefits through the provision of a new health facility within the emerging Gledswood Hills and the greater south western Sydney area. The

proposal would also potentially provide 400 future construction jobs and 800 direct operational jobs should the CMC be completed in full.

The Department's assessment concludes that while the proposal's built form will be larger than the existing and proposed built form of the surrounding area, subject to the recommended conditions, the proposal will include adequate mitigation measures, including building setbacks and landscaping opportunities, to minimise adverse impacts. The proposal also demonstrates that articulation through material selection and placement can be included in the detailed design of future development applications to aid in reducing the perception of the building's bulk and scale when viewed from the surrounding areas.

The Department is satisfied that the proposal has satisfactorily responded to the issues raised and recommends the SSD application for the proposed CMC concept proposal be approved, subject to recommended conditions. The Department's recommended conditions would ensure the future development applications for the construction of the CMC will include the necessary information required for the assessment of each stage of the proposal.

## 6. RECOMMENDATION

In accordance with section 89E of the EP&A Act, it is recommended that the Executive Director, Priority Projects Assessments, as delegate of the Minister for Planning:

- a) **consider** all relevant matters prescribed under section 79C of the EP&A Act, as contained in the findings and recommendations of this assessment report and appended documentation; and
- b) **grant consent** to the State significant development application for the concept proposal of the Camden Medical Campus (SSD 7387), subject to the recommended conditions of consent; and
- c) **sign** the attached development consent attached at **Appendix D**.

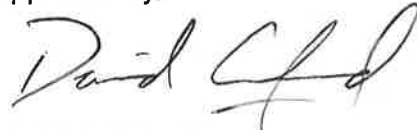
Prepared by: Michelle Niles, Planner

Endorsed by:



Karen Harragon 7/4/17  
**Director**  
**Social & Other Infrastructure Assessments**

Approved by:



David Gainsford 27/4/17  
**Executive Director**  
**Priority Projects Assessments**

## **APPENDIX A RELEVANT SUPPORTING INFORMATION**

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

1. Environmental Assessment  
[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7387](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7387)
2. Submissions  
[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7387](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7387)
3. Applicant's Response to Submissions  
[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7387](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7387)

## **APPENDIX B CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENT(S) AND DCP(S)**

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### **State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)**

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

The proposal is for SSD in accordance with s.89C of the EP&A Act because it is a concept proposal for a future development for the purpose of a hospital and medical centre with a capital investment value (CIV) in excess of \$30 million, under clause 14 (Hospitals, medical centres and health research facilities) of Schedule 1 of the SRD SEPP.

### **State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)**

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.

The contamination assessment undertaken for the site indicates that the potential for significant and/or widespread chemical contamination arising from historical land use activities is low and chemical contamination within fill materials of the site do not pose an unacceptable risk to human health or ecological receptors. Asbestos containing materials was not observed within the soil materials. The contamination assessment concluded that the site does not contain significant contamination and the site is suitable for the proposed hospital land use.

The Department is satisfied that, in accordance with clause 7 of the SEPP, the investigations undertaken of the subject site demonstrate that the site can be made suitable for the continued use for the intended purpose upon remediation of the site.

### **State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)**

The aim of the ISEPP 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.

Schedule 3 of the Infrastructure SEPP requires traffic generating development to be referred to the RMS. The proposal was referred to the RMS who did not object to the proposal however noted that the submitted SIDRA model contained errors. The Applicant consulted with RMS directly to correct the errors within the modelling, with the RMS not raising any concerns to the amended traffic modelling dated 21 February 2017. The updated SIDRA model indicated that the Camden Valley Way/Gregory Hills Drive intersection would operate at above capacity levels in 2031 and 2036 without development of the proposal and that the proposal would only increase average peak delay times between 1.8 seconds and 5.1 seconds in the 2036 scenario. The Gregory Hills Drive/Central Hills Drive intersection will experience an average peak delay of 22.7 seconds during the PM peak in the 2036 scenario. The Department has recommended a condition that the Applicant consult with RMS and Council, prior to lodgement of the development application for Stage 1 works, regarding the need for any potential infrastructure update at this intersection.

The Department is satisfied that the proposal has adequately considered the accessibility of the site, traffic generation and parking requirements for the CMC.

**State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)**

SEPP 33 aims to provide clear definitions for hazardous and offensive industries and ensure that consideration of any application to carry out hazardous an offensive industries is accompanied by sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact.

Physical works are not proposed as part of the concept approval. Appropriate information for assessment against SEPP 33 will be required during future applications for the staged construction of the CMC.

**State Regional Environmental Plan No 20 – Hawkesbury Nepean River (No 2 – 1997) (SREP 20)**

SREP 20 aims to protect the environment of the Hawkesbury-Nepean River system by ensuring that the impacts of future land uses are considered in a regional context.

Physical works are not proposed as part of the concept approval. Appropriate erosion and sediment control measures will be recommended on during future applications for the staged construction of the CMC.

**State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (SRGC SEPP)**

Appendix 1 Oran Park and Turner Road Precinct Plan of SRGC SEPP 2006 aims to ensure the creation of quality environments and good design outcomes. Consideration of the relevant clauses of the Oran Park and Turner Road Precinct Plan is provided below in Table 1.

**Table 1: Consideration of SRGC SEPP**

<b>SRGC SEPP 2006</b>	<b>Criteria</b>	<b>Department Comment/Assessment</b>
Clause 2.3	Zone objectives and land use table	The site is zoned B5 Business development. The proposal is consistent with the objectives of the B5 zone as it will facilitate the future construction of the CMC which will generate 400 construction jobs and 800 direct jobs once operational.
Clause 4.3	Height of buildings	The maximum height of buildings permitted on the land is 15 m. The proposal includes a building envelope with a height of 26.6 m, which proposes a variation to the maximum height development standard of 11.6 m. The variation to this standard is discussed below.
Clause 4.6	Exceptions to development standards	<p>The proposal includes a variation to clause 4.3 Height of buildings. The maximum height of buildings allowed on the subject site is 15 m. The proposal includes a building envelope with a height of 26.6 m, which proposes a variation to maximum height control by 11.6 m.</p> <p>The Applicant has submitted a Clause 4.6 Variation Statement (Statement) justifying the proposed departure. The Statement notes that setbacks of between 6.5 m and 56.5 m have been provided to the eastern site boundary to reduce the visual impact of the proposal and that a compliant building would result in a worse built form outcome as it would lead to increase overshadowing of the residential area due to use of the minimum setback amount. The Applicant also notes that the additional floor space provided from the additional height, allows for three levels of hospital, medical centre and parking to be provided.</p>

		<p>The Department considers that the variation to the development standard is acceptable due to the setbacks provided. Setbacks from the site boundaries ensures that overlooking and overshadowing is minimised particularly to the residential areas to the east and south east. Variation to the building envelope ensures that the tallest components of the proposal are setback further into the building depth and provides for a visual interesting building mass. The indicative perspectives submitted demonstrates that the bulk and scale of the buildings can be softened through the façade design. The Department also notes the building footprint allows for the provision of additional landscaping above that which would have been delivered with a compliant building footprint.</p> <p>The Department notes that the contravention of the development standard does not raise any matters of significance for State or regional environmental planning. Additionally, the Department considers that there is minimal public benefit in maintaining the development standard noting that strict compliance would result in a larger building footprint or a reduction of the number of hospital beds provided. Therefore, the Department considers the variation to the development standard acceptable.</p>
Clause 6.6	Development in special zones	The site is located in the Turner Road Employment Area and subject to a site specific Development Control Plan (DCP) located at Appendix B3 of the Turner Road DCP 2007.

### Development Control Plans

It is noted that clause 11 of the SRD SEPP provides that development control plans do not apply to SSD. Notwithstanding, consideration of relevant development controls contained in the Turner Road Precinct DCP 2007 has been given in **Table 2**.

**Table 2: Consideration of the relevant DCP**

Turner Road DCP 2007 Criteria	Department Comment/Assessment
<b>Part A – Precinct Wide DCP</b>	
Clause 6.3 Salinity and Soil Management	<p>The site is located in land where development may be constrained by surface salinity and moderately saline soils at depths in order of 1 m. A Salinity Investigation and Management Plan was undertaken as part of the original subdivision of the site which concluded that soils were mildly and moderately aggressive to concrete and steel and that moderate to very saline conditions were present. The report recommended a Salinity Management Plan with a range of management strategies to be implemented and considered during construction works.</p> <p>The EIS is also accompanied by a Review of Imported Soil Materials &amp; Gate Check Sampling Report confirming that imported fill associated with the site works approved as part of Development Consent 977/2014 is compliant with the Gregory Hills Corporate Park Fill Management Plan.</p> <p>Compliance with recommendation of the Salinity Investigation and Management Plan, dated May 2012, will be recommended as a condition of approval as part of any future development application for the site.</p>

<p>Clause 6.10 Acoustics</p>	<p>The DCP does not contain specific acoustic noise controls for hospital or health services facilities however requires all industrial, commercial and employment development to comply with Council's Environmental Noise Policy.</p> <p>The submitted Acoustic Impact Assessment provides a range of recommendations to achieve internal noise intrusion levels required by Australian Standards and the NSW Road Policy. These measures include glazing and opening standards for all external windows and doors, roof and external wall materials and ventilation requirements. The Assessment concluded that noise impacts associated with the hospital will be compliant with the applicable NSW EPA Industrial Noise Policy subject to the residential properties having perimeter fences of 1.8 m and management controls (such as signage advising visitors to be conscious of their noise generation while outside) being implemented and enforced.</p> <p>Noise from ambulance sirens are not covered in the NSW EPA <i>Industrial Noise Policy</i>, however the Assessment notes that the ambulance bay is located over 100m from the residential properties and that sirens are only used within the hospital premises for short periods to alert motorists or pedestrians. The Assessment advises that noise from an ambulance idling in the ambulance bay would not be expected to be audible to the residential properties.</p>
<p>Clause 8.1 Sustainable Building Design</p>	<p>The DCP identifies that developments not affected by BASIX should achieve a 40 per cent reduction of baseline potable water consumption. Additionally, building design should incorporate passive solar and ventilation measures to respond to local site conditions.</p> <p>The concept proposal does not propose details regarding the design of the proposed CMC however the Architectural Design Statement (ADS) accompanying the EIS advises of a range of energy and water saving measures incorporated into previously completed health facilities including hybrid air condition systems, grey water usage and rain water harvesting. The ADS indicates that these measures are the easiest to incorporate into hospital designs as they deliver significant long term financial benefits. The ADS indicates that a double or triple paned glazed curtain walling system may be incorporated to provide a thermally efficient facade design.</p> <p>Further details will be required to be submitted with future applications.</p>
<p>Clause 8.2 Stormwater and Construction Management</p>	<p>The DCP requires that all development be designed in accordance with the DECC <i>Australian Rainfall and Runoff</i> (1997) and Council's Engineering Design Specification.</p> <p>Further details will be required to be submitted with future applications.</p>
<p>Clause 8.3 Waste Management</p>	<p>The DCP requires all development to submit a waste management plan (WMP) outlining waste storage measures, waste volumes and method of collection.</p> <p>The proposal is accompanied by a WMP and draft Operational WMP outlining the management practices during the construction phase and indicative operation management practices. Final WMP's will be required to be submitted for assessment during the application submission stages.</p>

<p>Clause 8.6 Safety and Surveillance</p>	<p>Building are to be designed to provide casual surveillance as a means of passive security.</p> <p>Whilst the proposal does not include the final external and internal design of the CMC, the indicative internal layout plans propose inpatient rooms which overlook the two street frontages providing passive surveillance of the street. Additionally, the indicative perspectives of the CMC indicate a high level of glazed facades providing for good sight connections from the street to the lower levels of the facilities.</p>
<p><b>Part B Site Specific DCP's – B3 Controls for the Turner Road Employment Area</b></p>	
<p>3.1 Land Uses</p>	<p>The DCP requires development on the subject site be for light industrial, function education, trade services or business premises land uses.</p> <p>The proposed development is for a health service facility comprising a private hospital, medical centre and ancillary uses. The proposed health services facility is permissible with consent in the B5 Business Development zone under the SGRC SEPP. The Department considers that the proposed variation to the preferred land use as acceptable as the proposed development fulfils the relevant objectives of the development standard. The concept proposal would generate 400 future construction jobs and 800 direct jobs once operational, aiding in providing a range of employment generating development in the locality and maximising the opportunities for local employment.</p>
<p>3.4 Public Doman and Interface Areas</p>	<p>Lots which adjoin riparian corridors are required to comply with a range of additional development controls including a minimum landscaped setback of 2 m from the riparian corridor and buildings which face the riparian corridor are to be visually articulated to avoid an expanse of unbroken walls.</p> <p>Development adjacent to the riparian corridor (the western boundary) includes landscaping, pathway, driveways and car parking spaces. As identified in the landscape concept plan, planting chosen for the landscaped areas directly adjacent to the riparian corridor have been chosen to visually continue planting from the riparian corridor. The multi-storey car park is setback 7 m from the western boundary and the detached hospital building is setback 19.5 m from the western boundary. A pedestrian walkway, setback between 1.5 m and 5 m, is proposed adjacent to part of the length of the western boundary. The landscaped area and pedestrian pathway will allow for maintenance access to the riparian corridor.</p>
<p>3.5 Site Planning</p>	<p>A minimum setback of 5 m from The Hermitage Way and 3 m from Digitalia Drive is required. This setback is to be landscaped and not dominated by parking areas or loading facilities. Additionally, onsite stormwater detention designed to minimise the impacts of stormwater run-off on adjoining riparians corridors and compliance with Councils stormwater controls.</p> <p>The proposal is setback a minimum of 6.5 m from The Hermitage Way and 4.5 m from Digitalia Drive. However due to the curved façade of the building, the majority of the building will be setback further than the minimum setbacks required along The Hermitage Way frontage. The street setbacks will be partly landscaped, at-grade car parking areas, driveways and pathways. Car parking will be partially screened from</p>

	<p>the public domain through the planting of a range of shrubs and trees, within the street setback areas, with mature heights of up to 30 m.</p> <p>On-site detention principles for each approved allotment within the Gregory Park Corporate Park was approved as part of the development consent granted for the subdivision of the park under development consent 277/2012 and 997/2014. Conditions of approval were recommended requiring post development flows to be consistent with pre-development discharge. It is proposed to collect stormwater from the car parking areas and building roofs via an on-site detention tank and discharged to Council's stormwater system along Digitaria Drive. A detailed stormwater design will be submitted during the staged development of the CMC.</p>
<p>3.6 Building Design</p>	<p>The DCP requires the scale and bulk of buildings to be consistent with the streetscape with larger scaled buildings or building elements to signify prominent corners. Facades are to be articulated and contain a high proportion of glazing with metal cladding discouraged. Roof top structures are to be integrated into the overall design of the building.</p> <p>The final design of the building is not proposed as part of the concept approval, however the submitted rendered perspectives indicate the buildings will contain a high level of glazing and articulation through a staggered building line and setback of upper levels. These features also serve to reduce the perception of bulk associated with the development, as the building lines of Levels 2 and 3 are set in further than the previous levels. The plant room associated with the main hospital building is located on the podium roof of Level 2 to reduce any increases in height associated with plant equipment. The lift overruns for the buildings add approximately 3 m to the height of the building however are setback from the roof's edge to reduce its visual impact.</p>
<p>3.7 Employment Operations</p>	<p>The DCP requires operational details of the development including information regarding the hours of operations, expected delivery details, nature of machinery to be operated on the site and location and external light sources.</p> <p>Operations details will be provided in the subsequent staging application for the CMC. The submitted EIS indicates that the hospital will be operational 24 hours a day with the ancillary uses and services (i.e. newsagents, consulting rooms, cafes etc.) restricted to shorter hours such as 7 am – 9 pm. A condition of approval has been recommended requiring the submission of operational details with the development application for the first stage of the CMC.</p>
<p>3.8 On Site Landscaping</p>	<p>The DCP requires front setbacks to be landscaped and in locations where parking is proposed forward of the building line, a minimum 2 m landscaping strip should be provided. Site landscaping should incorporate native, low water usage plants where possible.</p> <p>While, the proposal includes car parking forward of the building line, a minimum landscaping strip ranging in width between 1m and 4m is provided along the eastern and western site boundaries to soften the visual impact of the development. Landscaping nodes are also proposed within at-grade car parking areas to soften and provide visual interest for at-grade parking areas. Landscaping proposed throughout the site includes species which have a proven viability in the area, requires low maintenance and includes indigenous canopy trees.</p>

## APPENDIX C GLOSSARY

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**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.*

### **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.*
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**APPENDIX D    RECOMMENDED CONDITIONS OF CONSENT**

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