

10 February 2020

Our Ref: 19-197 LW

Mr David Gibson

NSW Department of Planning, Industry & Environment
320 Pitt Street
Sydney NSW 2000

Dear David,

RE: S4.55(2) MODIFICATION APPLICATION TO SSD 7387 IN RELATION TO CAMDEN MEDICAL CAMPUS, GLEDSWOOD HILLS

This Statement has been prepared for Gregory Hills Development Company Pty Ltd (GHCP) by City Plan Strategy & Development Pty Ltd (City Plan) to accompany an application under Section 4.55(2) of the Environmental Planning and Assessment Act 1979 (the Act).

1. THE APPROVED DEVELOPMENT

On 27 April 2017, development consent was granted by the Minister for Planning for a "staged" development comprising the following:

Concept proposal for the future development of the site as a medical precinct, including a private hospital and medical centre, comprising:

- *indicative future uses as a medical precinct;*
- *future building footprints, envelopes and heights;*
- *vehicle entry and egress points;*
- *the general car parking footprint; and*
- *the general landscaping footprint.*

The approved development also included indicative staging, a maximum indicative gross floor area (GFA) of approximately 73,000m², a total of approximately 1,080 car parking spaces (a mix of basement, at-grade and multi-storey spaces) and a maximum building height of 6 storeys / 26.6 metres. The development was costed to have a capital investment value of \$331,491,133.

Since that time, detailed design development has been undertaken, resulting in a series of modifications to the approved development, as set out in this statement.

This statement should be read in conjunction with the following attached documentation:

- Architectural Plans and Perspectives prepared by Health Projects International;
- Architectural Design Statement prepared by Health Projects International;
- Landscape Concept Documentation prepared by Site Image;
- Landscape Design Statement prepared by Site Image;
- Bushfire Advice prepared by Eco Logical Australia;
- Civil Plans prepared by Mott Macdonald;

- Stormwater and Servicing Strategy Report prepared by Mott Macdonald;
- Traffic and Parking Impact Statement - Addendum 1 prepared by Mott Macdonald; and
- S4.55 (2) Access Statement prepared by Morris Goding Accessibility Consulting.

2. PROPOSED MODIFICATION

2.1. Overview of the Modifications

An overview of the key modifications proposed is provided below:

- Amendment to the approved footprint/envelope of the multi-storey carparking structure located at the southern end of the site. The amended building envelope is proposed to comprise a medical research building with one level of basement parking. The parking spaces in the approved multi-storey parking structure are proposed to be relocated as per the below point;
- Amendment to the approved footprint/envelope of the mixed-use medical building opposite the northern part of the adjacent riparian zone is proposed. The amended building envelope is proposed to comprise a multi-storey carparking structure (with the relocated parking spaces as per the point above);
- Amendment to the approved building envelope for the main hospital; and
- Reduction in GFA (approximately 9,312m² of GFA) to accommodate the proposed modifications.

The below provides a summary of the key modifications proposed. Reference to the amended Architectural Plans prepared by Health Projects International (Appendix 1) should be made for further detail.

Basement level:

- Basement carpark layout rationalised to improve staging.
- New basement carparking provision to serve biomedical research building

Ground level:

- Setback of hospital building increased to north-western boundary to enable provision of larger/improved landscaping area.
- Internal layout of hospital updated to suit new reduced building footprint.
- Carpark entry relocated to suit basement reconfiguration.
- Setback of hospital increased to north-eastern boundary to enable provision of larger/improved landscaping area.
- Main entrance/arrival modified to enhance patient/visitor experience.
- Change of use and enlargement of the former Medical Block for use as a multi-storey carpark.
- Change of use and reduction of the former multi-storey carpark for use as biomedical research building.
- Removal of on-grade parking spaces along the site's western boundary.

First, second, third, fourth and fifth floor level:

- Internal layout of hospital updated to suit new reduced building footprint.
- Building configuration rationalised to improve staging.
- Change of use and enlargement of the former Medical Block for use as a multi-storey carpark.
- Change of use and reduction in size of the former multi-storey carpark for use as biomedical research building.

Second floor level:

- Landscape on roof to improve outlook from patient room.

- Rainwater collected from the podium will be collected and reused on the site.

Roof level:

- Substantial increase in provision of photovoltaic array.
- Removal of roof deck parking.

Staging:

- The indicative staging has been amended, as detailed in **Figure 1**. There will be three indicative stages, with the multi-storey carpark and biomedical research building proposed to be developed at any time.



Figure 1: Indicative Staging Plan (Source: HPI)

Landscape:

- Larger lawn and landscape areas a result of the removal of the western driveway on Digitaria Drive.
- Open space recreation area shaped changed and corner signage wall enlarged on site's north-eastern extent.
- Changed set down and forecourt on eastern part of site, creating larger landscape areas, water features and forecourt.
- Minor adjustment to paving patterns and garden shapes and climbers from deep soil added to create a sustainable 'green wall' to proposed multi-storey carpark.
- Open space removed to the south of the multi-storey carpark and offset by new café terrace to southeast corner of the Biomedical research building.
- Open space relocated on eastern side of the Biomedical research building.
- Riparian landscape removed on southwestern extent of Biomedical research building and new large island of trees and massed planting created in carpark area.
- Canopy trees arrangement aligned in boundary strip planter along southern boundary.
- Extensive podium level landscaped terraces introduced to Hospital to provide a range of amenity areas.

Civil:

- External car park drainage and levels amended to suit new building footprint and revised external layout of carpark.
- Driveway locations updated to correspond with new architectural scheme.
- Due to the basement carpark extents under the biomedical research building and head clearance requirements, the design levels along the southern side of the biomedical research building have been lifted and a retaining wall is required to make up the level difference against the adjacent lot to the south.

The Capital Investment Value (CIV) of the project has updated and is now \$417,280,000.

2.2. Conditions to be Modified

To give effect to the proposed modifications, this application seeks to modify the following conditions of consent:

Condition	Proposed Modification
Condition A4	The Applicant shall carry out the development generally in accordance with the: c) following drawings, except for: i) any modifications which are 'Exempt' or 'Complying Development'; and ii) otherwise provided by the conditions of this consent

The table below outlines the proposed changes required to Condition A4.

Table 1: Amendments to Condition A4

Architectural Concept Plans prepared by <i>Health Projects International</i>	
Name of Plan	Date / Revision
Site Plan Overall Site Plan	08/06/16 04/02/20 Rev 2
Basement Level Floor Plan Basement Master Plan	01/06/16 07/02/20 Rev 4
Ground Level Floor Plan Ground Floor Master Plan	01/06/16 07/02/20 Rev 6
Level 1 Floor Plan Level 1 Floor Plan Master Plan	01/06/16 07/02/20 Rev 6
Level 2 Floor Plan Level 2 Floor Plan Master Plan	01/06/16 07/02/20 Rev 6
Level 3 Floor Plan Level 3, 4, 5 Floor Plan Master Plan	01/06/16 07/02/20 Rev 6
Level 4 Floor Plan	01/06/16
Level 5 Floor Plan	01/06/16
Roof Plan Roof Plan Master Plan	08/06/16 07/02/20 Rev 3
Elevations & Sections Elevations & Sections	30/03/17 A 31/01/20 Rev 4

* Red highlights new revisions

Landscape Plans prepared by <i>Moir Landscape Architecture</i> Site Image			
Dwg No.	Rev	Name of Plan	Date
LP01	B	Cover Sheet	06/06/16

LP02	B	Landscape Master Plan	06/06/16
LP03	B	Landscape Plan A	06/06/16
LP04	B	Landscape Plan B	06/06/16
LP05	B	Landscape Plan C	06/06/16
LP06	B	Detail Plan – A & B	06/06/16
LP07	B	Detail Plan – C & D	06/06/16
LP08	B	Detail Plan E	06/06/16
LP09	B	Landscape Elevations	06/06/16
LP10	B	Landscape Section	06/06/16
LP11	B	Plant Schedule	06/06/16
LP12	B	Theming	06/06/16
L-000	A	Cover Sheet	13/01/2020
L-001	A	List of Amendments	13/01/2020
L-C100	A	Landscape Masterplan Render	13/01/2020
L-100	A	Landscape Masterplan	13/01/2020
L-101	A	Landscape Plan – Ground Level	13/01/2020
L-102	A	Landscape Plan – Ground Level	13/01/2020
L-103	A	Landscape Plan – Ground Level	13/01/2020
L-104	A	Landscape Plan – Ground Level	13/01/2020
L-201	A	Landscape Plan – Level 2	13/01/2020
L-202	A	Landscape Plan – Level 2	13/01/2020
L-501	A	Landscape Specifications & Plant Schedule	13/01/2020
L-502	A	Landscape Details	13/01/2020

* Red highlights new revisions

Condition	Proposed Modification								
Condition A6	The maximum building height of the development shall be consistent with the Concept proposal building envelope plan for each building, as detailed below: <table> <tr> <th>Building Block</th><th>Maximum Height - RL</th></tr> <tr> <td>Hospital</td><td>RL 129.10</td></tr> <tr> <td>Medical Biomedical research building</td><td>RL 129.10 RL 124.55</td></tr> <tr> <td>Multi-storey carpark</td><td>RL 124.55 RL 128.50</td></tr> </table>	Building Block	Maximum Height - RL	Hospital	RL 129.10	Medical Biomedical research building	RL 129.10 RL 124.55	Multi-storey carpark	RL 124.55 RL 128.50
Building Block	Maximum Height - RL								
Hospital	RL 129.10								
Medical Biomedical research building	RL 129.10 RL 124.55								
Multi-storey carpark	RL 124.55 RL 128.50								
Condition B12	The future development application for Stage 1 will include an adequate building line setback to the southern site boundary, which is to be no less than 7m, to allow for the planting of canopy trees between the Multi-storey Parking Block biomedical research building and the southern site boundary.								

2.3. Justification for proposed modification

The primary reason for the proposed modifications relates to the operational requirements of the end users of the development and the inclusion of a biomedical research building on the site. As detailed in the amended architectural plans, the proposed location of this building is in the southern part of the site where the approved multi-storey carpark is located.

The proposed biomedical research building will provide a centre of excellence for biomedical research in south-western Sydney offering high-quality research and laboratory facilities supported by spaces for teaching, study and collaboration. The building will offer a bright and stimulating environment with exemplary facilities to attract and support internationally recognised scientists and researchers. The proposed building will also offer the opportunity for collaborative research integrating clinic research activities within nearby teaching hospital at Liverpool and Campbelltown and Western Sydney University.

The biomedical research building has been planned to integrate visually and functionally with the adjacent Camden Private Hospital facility, and to work side-by-side as mutually supportive facilities within the overall Camden Medical Precinct.

The integration of education, teaching and research facilities within the hospital, together with the close adjacency of the biomedical research building, will provide a unique opportunity for the Camden Medical Campus Precinct to become a 'Knowledge Hub' within the community and be attractive to doctors and other clinicians, as well as professionals in medical-related industries.

Other modifications included as part of this application relate to changes to the main hospital building which have occurred as a result of market feedback and subsequent design development. One of the driving strategies for the modifications is derived from a stated aspiration to be a *Carbon neutral operation in a world leading health precinct*, with emphasis on biophilic design.

2.4. Pre-lodgement Consultation

A Scoping Report was provided to the Department of Planning, Industry and Environment (Department) with a view to obtain pre-lodgement advice on the proposed modifications (the subject of this modification application) to the approved development. As detailed in the Department's letter dated 23 September 2019, the Department was satisfied with the level of assessment and community engagement proposed within the Scoping Report. The Department identified the inclusion of Torrens title subdivision as part of the modification application is not supported and approval should be sought via an alternate approval pathway. As such, approval for Torrens title subdivision is not sought under this modification application.

2.5. Supporting Documentation

This subject Section 4.55(2) Modification Application is supported by the following documentation: -

- Architectural Plans prepared by Health Projects International (Appendix 1);
- Architectural Design Statement prepared by Health Projects International (Appendix 2);
- Landscape Concept Documentation prepared by Site Image (Appendix 3);
- Landscape Design Statement prepared by Site Image (Appendix 4);
- Bushfire Advice prepared by Eco Logical Australia (Appendix 5);
- Civil Plans prepared by Mott Macdonald (Appendix 6);
- Stormwater and Servicing Strategy Report prepared by Mott Macdonald (Appendix 7);
- Traffic and Parking Impact Statement - Addendum 1 prepared by Mott Macdonald (Appendix 8); and
- S4.55 (2) Access Statement prepared by Morris Goding Accessibility Consulting (Appendix 9).

3. STATUTORY CONSIDERATIONS

3.1. Section 4.55(2) of the Environmental Planning and Assessment Act, 1979

Section 4.55(2) of the Environmental Planning and Assessment Act, 1979 (the Act), enables a consent authority to modify a development consent upon application being sought by the applicant or any other person entitled to the Act on the consent, provided that the consent authority as part of the assessment process take into consideration a range of matters, as addressed below.

3.1.1. Substantially the same development

The consent authority must be satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all).

The development, as modified would essentially and materially have the same essence, as described below.

- SSD_7387 was approved on the basis that it was for a concept proposal (part of a "staged" development) for a medical precinct with private hospital and general footprints, building envelopes and general/indicative arrangements in terms of GFA, carparking, landscaping etc. There was enough flexibility built into the approved concept to enable variation to satisfy market feedback and to enable the feasibility of construction of the approved concept.
- The revised built form incorporates a similar building envelope and footprint, retaining the general layout and building arrangement, with a reduced GFA. As discussed further in Section 3.1.2 of this Statement, there is an overall improvement to shadowing and visual massing impacts to the surrounding environment.
- The interchanging of the use of the two (2) buildings on the site (carpark to biomedical research building and medical to carpark) will not change the overall use or intensity of uses on the site.
- The generous approved landscaping scheme which plays a key role in mitigating the visual bulk and scale of the development is enhanced and improved as a result of the modification.
- The change in land uses and subsequent reduction in GFA results in an overall parking requirement of 993 parking spaces for both the hospital and biomedical research uses, a reduction of 87 carparking spaces from the approved development. However, it is proposed to retain the approved 1,080 carparking spaces and to designate a number of surplus spaces as accessible parking spaces.
- The combined traffic generation for the whole development does not exceed previously approved calculations and will not negatively impact the adjoining road network.

Further, the proposed modifications will not result in any of the following:

- Any substantial change to the relationship to adjoining properties. Again, whilst there is some change to the overall massing and building footprint of the development, the modification will result in a reduced built form which will assist in mitigating any visual bulk and scale and also assist in reducing shadow impacts.
- Any adverse impact on neighbouring properties from the changes (overshadowing, visual and acoustic privacy, traffic generation, visual impact etc.).

Accordingly, the proposed modifications do not change the essential features of the approved development and therefore, the amended proposal is "substantially the same development".

3.1.2. Section 4.15(1) matters for consideration

(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 Planning Secretary 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*
 - (iia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and*
 - (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),*
 - (v) (Repealed)*
- that apply to the land to which the development application relates,*

Refer to Section 3.2 of this Statement.

(b) the likely impacts of the development, including environmental impacts on both the natural and built environments, and the social and economic impacts in the locality

In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in Section 4.15(1) as they are of relevance to the development the subject of the application.

Built Form/ Visual Massing

The general arrangement and layout of the development has remained largely unchanged, with the site separated into three distinct building blocks comprising a hospital block, a biomedical research block and a multi-storey parking block.

The hospital and former multi-storey carpark building have been reduced in size as a result of design rationalisation and the proposed change of use of the former multi-storey carpark building to a biomedical research building.

The former medical block has been enlarged marginally to accommodate its proposed use as a multi-storey carpark. However, its built form and massing is appropriate given the maximum height has been reduced from RL129.10 to RL124.55 and its location is on the western extent of the site, away from nearby residential dwellings.

Refer to Figure 2 and Figure 3 for a comparison between the approved and proposed site layout.



Figure 2: Approved Site Layout (Source: HPI)



Figure 3: Proposed Site Layout (Source: HPI)

Table 2 outlines the development statistics of the approved development when compared to the modified development. The modifications result in a reduction of approximately 9,312m² of GFA across the site. At ground floor level, the building footprint is reduced by 3,727m² (refer to the Architectural Design Statement at Appendix 2 for further detail). There is no reduction to the maximum height of the hospital and multi-storey carpark, but a reduction in height of the biomedical research building.

Table 2: Comparison of development statistics

	Height	GFA	Ground Level Building Footprint
Approved	Hospital: RL 129.10 Biomedical Research Building: RL 129.10 Multi-storey carpark: RL 128.50	73,000m ²	18,891m ² , representing 45.58% of site coverage.
Proposed modification	Hospital: RL 129.10 Biomedical Research Building: RL124.55 Multi-storey carpark: RL 128.50	63,688m ²	15,164m ² , representing 36.1% of site coverage.
Reduction	N/A	9,312m ²	3,727m ² or 9.48%

Figure 4 illustrates a comparison of the proposed modifications to the built form, which has ultimately decreased the GFA of the approved built form.

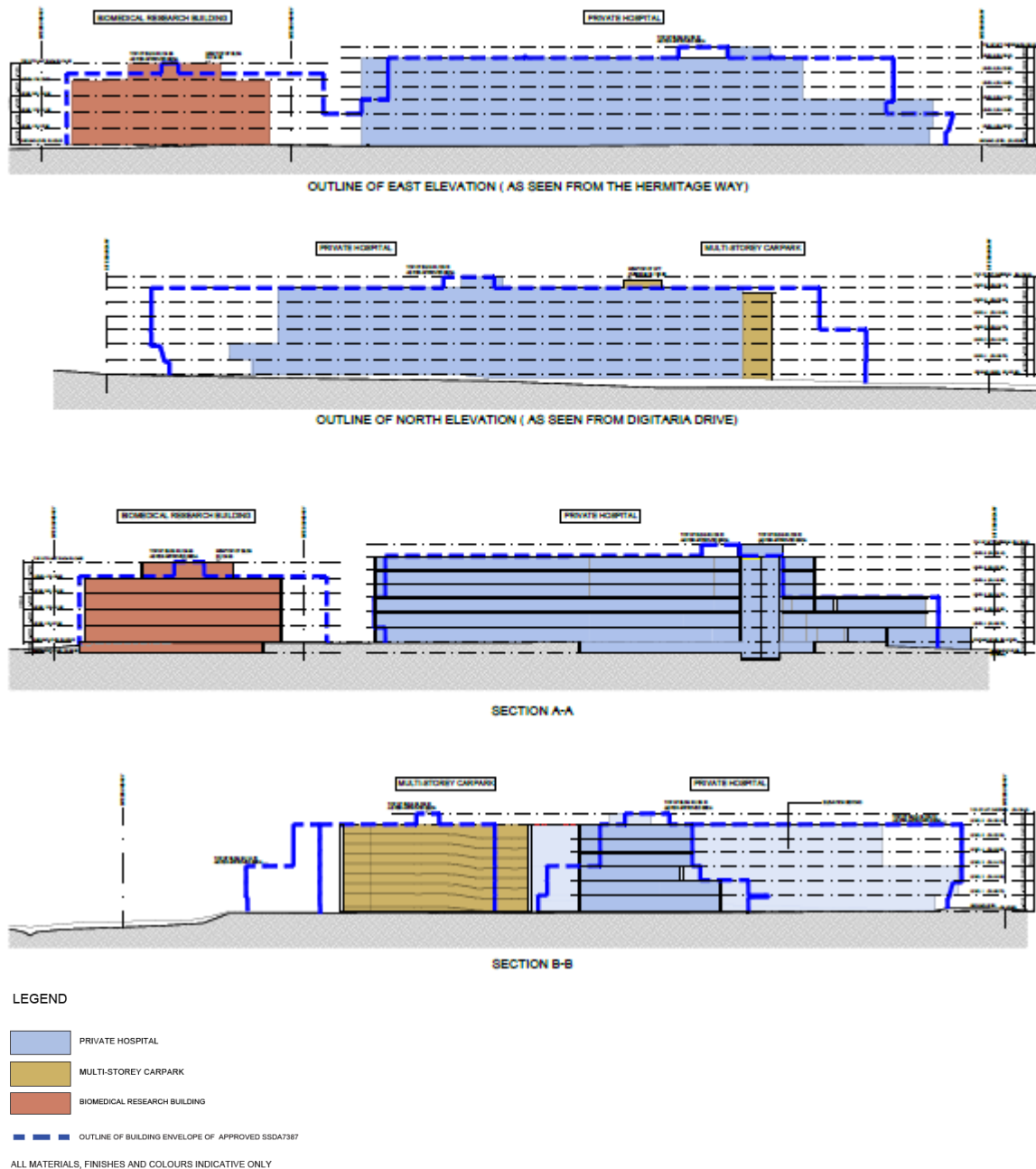


Figure 4: Elevation and Section Comparisons (Source: HPI)

The modified development will maintain a strong presence with an active street frontage facing The Hermitage Way, with softening landscape and ameliorating features providing an attractive and welcoming development. The indicative perspectives have been updated to reflect the amended architectural plans and provide an indication as to how the different buildings on the site can be differentiated by external finishes.



Figure 5: Approved indicative view looking north-west across The Hermitage Way (Source: HPI)



Figure 6: Proposed indicative view looking north-west across The Hermitage Way (Source: HPI)

Environmental Amenity

HPI has undertaken a mid-winter shadow analysis and has included shadow diagrams as part of the amended Architectural Design Statement (Appendix 2).

Figure 7 provides a comparison of shadow impacts of the approved built form and the modified built form during the winter solstice. Overall, there is a reduction in overshadowing and as with the approved development, the proposed modifications will not adversely impact solar access on the site and throughout the locality, including any residential properties or public open space areas.

A summary of the overshadowing impacts is provided below.

- At 9am there is an overall reduction in overshadowing, however there is some additional overshadowing which occurs to the southwest of the site, including the hospital site to the south and part of the riparian zone.
- At 12pm there is an overall reduction in overshadowing, however there is some very minor additional overshadowing which occurs to the hospital to the south of the site.
- At 3pm there is an overall reduction in overshadowing to the Camden Medical Campus Precinct and a reduction in overshadowing to the residential dwellings located to the northeast of the site. There is some additional overshadowing caused to the residential properties to the southeast of the site however this is limited in duration. All residential properties to the west of the site will maintain at least three hours of sunlight between 9am and 3pm on 21 June.



Figure 7: Shadow diagrams on 21 June (Source: HPI)

Landscaping

Site Image has prepared amended landscape plans (Appendix 3) and a Landscape Design Report (Appendix 4) to accommodate the modified building envelope and footprint. The modified plans provide suitable landscaping across the site and along its boundaries reflective of the local endemic landscape, maturing local community open spaces and specific function, aesthetic and amenity requirements of the site.

The proposed modifications to the approved landscape design will enhance the landscaping treatment along the site's boundaries, helping soften the development when viewed from the site's boundaries. The proposed modification provides a significant increase in landscaping across the site, with the total landscape area increasing from 22.83% (9,465m²) to 31.88% (13,218.5m²) as part of this modification application. A comparison between the approved landscape plan and proposed landscape plan is provided at Figure 8 and Figure 9.



Figure 8: Approved Landscape Plan (Source: Moir Landscape Architecture)



Figure 9: Proposed Landscape Plan (Source: Site Image)

Parking

Mott Macdonald have prepared a Traffic and Parking Impact Statement - Addendum 1 (Appendix 8) to assess the revised parking requirements of the hospital and biomedical research building.

The development consent approved 1,080 parking spaces for the Camden Medical Campus Precinct, comprising a mixture of at-grade parking, basement parking and a multi-storey carpark which be provided progressively along with the construction of the Camden Medical Campus stages. The proposed modification seeks to retain the 1,080 parking spaces for the Camden Medical Campus Precinct, noting that each subsequent development application will be accompanied by parking requirements needed for the proposed number of additional staff, patients and visitors.

A summary of the parking requirements for both the hospital and biomedical research building is provided below.

Hospital

As detailed in the Statement, the amendments to the hospital include a decrease of 101 beds/seats and 2,902m² for retail and back-of-house functions as well as a 94 room increase for specialist hospital units.

Based on the calculations adopted in the original Traffic Impact and Parking Assessment (TIA) submitted with the development application, and using the same key assumptions, the revised parking requirement for the hospital is shown in **Table 3** with comparison to the approved provision.

Table 3: Changes to Hospital Parking Requirements (Source: Mott Macdonald)

Hospital Function	Approved Total Parking Req.	Proposed Total Parking Req.	Proposed Accessible Parking Req.	Proposed Total Parking Req.
Wards & Op. Theatres	568	427	- 25%	Wards & Op. Theatres
Specialist Hospital Units	197	311	+ 58%	Specialist Hospital Units
Retail & Back-of-House	183	87	- 52%	Retail & Back-of-House
Total	948	826	12	- 13%

There is a requirement to provide 826 spaces, including 12 accessible spaces for the hospital. This modification application seeks to provide 885 parking spaces for the hospital site (59 more than the requirement) across a mixture of basement, on-grade and multi-level parking facilities. While the proposed design provides a surplus of 59 spaces, some of these additional parking spaces will be designated as accessible parking spaces.

Biomedical research building

As detailed in the Statement, the removal of the approved biomedical research unit from the hospital to an independent facility has resulted in the need for a standalone calculation of the parking requirements. The parking requirements are based upon those outlined in the TIA, with revised staffing requirements and occupancy levels.

The GFA proposed for the biomedical research use has increased significantly from 3,204m² to 10,840m². The revised parking requirement for this is provided in Table 4.

Table 4: Changes to Biomedical Research Parking Requirements (Source: Mott Macdonald)

	Approved Total Parking Req.	Proposed Total Parking Req.	Proposed Accessible Parking Req.	Percentage Change
Biomedical research building	53	167	4	+ 215%

The increase in GFA necessitates an increase of 114 spaces to provide a total of 167 spaces, including four accessible parking spaces for the biomedical research building. This modification application seeks to provide 195 spaces (28 more than the requirement) across two on-grade locations and a basement carpark. While the proposed design provides a surplus of 28 spaces, some of these additional parking spaces will be designated as accessible parking spaces.

Pedestrian Safety

The relocation of the multi-level parking facility to the west of the hospital is a positive outcome for pedestrian movement around the precinct. The direct pedestrian access achieved to the main hospital building from the parking facility removes all pedestrian-vehicle conflicts.

Traffic Generation

The Traffic and Parking Impact Statement - Addendum 1 (Appendix 8) includes an assessment of the revised traffic generation anticipated as a result of the modification for both the hospital and biomedical research building.

Hospital

The reduction in GFA to the hospital building results in a lesser impact on traffic generation. Specifically, there will be decreases in trip generation of 19% and 39% for AM and PM peak hours respectively. This is a result of the change of land use within the hospital, with the result spreading trip demand over the day rather than within peak periods and the removal of the research unit from the hospital site. There will be minor decreases with trips in the non-peak direction.

Biomedical research building

The traffic generation for the development is based on those outlined in the TIA. The expected operational characteristics of the proposed research building have again been adopted to remain consistent with the parking assessment.

The increase in size of the biomedical research use results in an increase in the number of trips generated by the development. However, when the traffic generation of the hospital and biomedical research building is combined, a net decrease in trip generation is observed. This is presented in Table 5.

Table 5: Combined Traffic Generation of Hospital and Biomedical research building (Source: Mott Macdonald)

	Approved Trips In	Proposed Trips In	Approved Trips Out	Proposed Trips Out
AM	558	542	174	177
PM	85	95	374	312

As a result of the reduction in combined traffic generation for the whole development, there will be no negative impact experienced in the surrounding road network.

Accessibility

Morris Goding Accessibility Consulting have prepared a S4.55(2) Access Statement (Appendix 9) which states that the proposed amendments can comply with the DDA Premises Standards and Australian Standards.

Stormwater Management

Mott Macdonald have prepared Amended Civil Plans and a Stormwater Management and Servicing Report (Appendices 6 and 7 respectively), which outlines the proposed civil design amendments required to accommodate the proposed modifications to the building design. The amendments include:

- External car park drainage and levels amended to suit new building footprint and revised external layout of carpark.
- Driveway locations updated to correspond with new architectural scheme.
- Due to the basement carpark extents under the research building and head clearance requirements, the design levels along the southern side of the research building have been lifted and a retaining wall is required to make up the level difference against the adjacent lot to the south.

All modifications have been annotated on the accompanying civil drawings, which comply with the applicable water quantity and quality requirements.

Riparian Corridor and Bushfire Risk

Since the approval of the SSD 7387, the riparian corridor has been reconstructed and revegetated in a manner consistent with the Vegetation Management Plan (in accordance with development consent 2012/277/1). Revegetation has occurred across the riparian corridor to the standard of an inner protection area as per the requirements of the Rural Fires Board. Ecological Australia has confirmed that the revegetation works are consistent with APZ requirements, refer to Appendix 5.

Further, there is a five-year maintenance agreement in place between the the owners of Lot 832/833 (The Hermitage Hospital) and Gregory Hills Corporate Park before the reserve is handed over to Council.

Other Considerations

The proposed modifications do not change the original assessment undertaken by the Department of Planning, Industry and Environment (DPIE) in relation to other environmental considerations assessed as part of SSD 738, in relation to contamination and stormwater easement.

(c) the suitability of the site for the development

The site is suitable to support the proposed development and is located in an established urban area, with all urban and infrastructure services available or capable of augmentation to meet the needs of the development. Investigations into contamination, geology, bushfire, access and services for the approved development demonstrate that the site is suitable for the proposed development and capable of accommodating development of the intensity approved, subject to mitigation measures to manage impacts during construction and operation to protect the amenity of adjoining residents and patients, staff and visitors.

The suitability of the site has therefore been comprehensively addressed and considered by virtue of the granting of development consent by the Department. The proposed modification is generally considered substantially the same development because there is no material change to the form, scale and function of the approved development. The suitability of the site, as such, remains unchanged.

(d) any submissions made in accordance with this Act or the regulations

The Department will consider any submissions received as a result of the notification process.

(e) the public interest

As demonstrated in this Statement, there are no unreasonable impacts that will result from the proposed development (as modified). In fact, the amended design will result in a more efficient and sustainable building that better meets the needs of staff and visitors and better responds to the context of the site and surrounds.

No public interest issues arise as a consequence of the proposed modifications. The Department's imposing conditions to preserve the public interest are not affected, since the proposed modifications continue to give effect to those general intentions, simply in a more practical and achievable way.

3.2. Relevant Planning Instruments and Development Controls

The principal planning controls and key considerations applying to the development are contained in:

- Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth);
- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- Biodiversity Conservation Act 2016;
- State Environmental Planning Policy (State & Regional Development) 2011;
- State Environmental Planning Policy (Infrastructure) 2007;
- Sydney Regional Environmental Plan No 20 - Hawkesbury-Nepean River (No 2-1997)
- State Environmental Planning Policy No. 33 - Hazardous and Offensive Development;
- State Environmental Planning Policy No. 55 – Remediation of Land;
- State Environmental Planning Policy (Sydney Region Growth Centres) 2006 - Appendix 1 Oran Park and Turner Road Precinct Plan

Further to the above, we note that the Turner Road Precinct Development Control Plan (January 2008) provides more detailed provisions, supplementing the provisions of the State Environmental Planning

Policy (Sydney Region Growth Centres) 2006 - Appendix 1 Oran Park and Turner Road Precinct Plan. However, pursuant to Clause 11 of SEPP SRD, Development Control Plans do not apply to State Significant Development. Therefore, the Turner Road Precinct Development Control Plan does not apply to the subject modification which seeks to amend an approved SSDA.

Since there are no substantive changes to the approved development, the modified proposal remains consistent with the relevant provisions of those controls as detailed in the original application and as subsequently assessed by DPIE in granting the consent, with the exception of the following provisions, as described below.

4. CONCLUSION

The proposal is for a Section 4.55(2) application to the approved Camden Medical Campus. The Modification Application seeks to modify the consent issued on 27 April 2017, under SSD reference 7387. In summary, the proposed Section 4.55(2) application:

- is considered substantially the same development as the development for which consent was originally granted;
- is appropriate when assessed by reference to the relevant matters for consideration under Section 4.15 (1);
- will improve the design, functionality, presentation and relationship of the building to the surrounding area; and
- will have no adverse environmental impacts on the site, the properties in the vicinity of the site resulting in no change to the overall building envelope, form, scale and function, as originally approved

The proposal as amended under this Section 4.55 (2) application warrants approval by the Department.

Should you require any further clarification or information in respect to the application, please contact Lotti Wilkinson (Associate) on (02) 8270 3500.

Yours Sincerely,



Stephen Kerr
Executive Director