

6 November 2020

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Betts

**Request for Secretary's Environmental Assessment Requirements
Proposed State Significant Development: The Sutherland Hospital Operating Theatre Upgrade Project**

Health Infrastructure NSW (HI) is the applicant for a proposed State Significant Development (SSD) application involving The Sutherland Hospital Operating Theatre Upgrade Project, comprising alterations and additions to the existing main hospital building and associated works (the proposal) at The Sutherland Hospital, Kingsway and Kareena Road, Caringbah (the site) in Sutherland Shire Local Government Area (LGA).

The proposal is State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (EPA Act) and schedule 1 clause 14(a) of the *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) as it involves development for the purposes of a health services facility with a capital investment value (CIV) in excess of \$30 million.

The purpose of this letter is to provide a preliminary environmental assessment in order to request the Secretary's Environmental Assessment Requirements (SEARs) in accordance with section 5.15 of the EPA Act and schedule 2 clause 3 of the *Environmental Planning and Assessment Regulation 2000* (EPA Regulation) for the preparation of an Environmental Impact Statement (EIS).

This request for SEARs is supported by an overview of the proposed development, sets out the statutory context, identifies the key likely environmental and planning issues associated with the proposal and should be read in conjunction with the following attachments:

- **Attachment A** – Indicative drawings prepared by HDR Architects; and
- **Attachment B** – Request for Biodiversity Development Assessment Report (BDAR) Waiver and Prescribed Ecological Actions Report (PEAR), prepared by Abel Ecology.

1 Background

In February 2019, the Minister for Health and Medical Research announced funding for the redevelopment of the Sutherland Hospital operating theatre complex. The scope of this funding includes eight operating theatres, two endoscopy suites, recovery and other perioperative clinical and supporting spaces in order to respond to the current and future health service demand.

The Sutherland Hospital Operating Theatre Upgrade Project (the Project) will build on and support the completed Sutherland Hospital Redevelopment, which delivered a new and expanded Emergency Department, as well as an expanded Intensive Care Unit (ICU) and additional general medical and surgical beds.

The Project will increase operating theatre capacity to meet future demand driven by an increasing and ageing population with associated increase in chronic and complex disease. The existing operating theatre infrastructure was delivered over the past 36 years. Over the years, the existing buildings have undergone extensions and additions which defines the current profile of the campus.

The Project will deliver a contemporary operating theatre environment, improve efficiencies and access to services and enable implementation of new models of care and surgical clinical pathways.

The objectives of the Project are to:

- Improve access to surgical services and patient flow;
- Improve functionality to support workflow and contemporary models of care;
- Increase surgical capacity and improve efficiency;
- Improve work performance and productivity; and
- Provide a flexible, contemporary operating theatre environment.

Construction of the operating theatre complex will improve operating theatre efficiency by streaming emergency, general elective, endoscopy and surgical short stay activity into appropriate care models and dedicated facilities. It will improve access to surgical services to the local community and improve the patient experience.

In addition to the expansion of operating theatre capacity, the project includes provision of a Magnetic Resonance Imaging Suite (MRI) at the Sutherland Hospital to respond to the current and future health service demand. Development of an MRI at Sutherland Hospital will improve access to care and provide more timely access to care for urgent cases. An onsite MRI service will reduce average length of stay, enhance patient outcomes and provide a better overall patient experience.

2 Subject Site

The site is located at Nos. 106 and 126 Kareena Road (Cnr Kingsway), Caringbah and is bounded by Kingsway to the north, Kareena Road to the west, a railway corridor to the south and an adjacent residential area to the east.

The total site area is approximately 9.3 hectares (ha).

Legal description

Figure 1 below indicates that the site comprises of the following three (3) allotments:

- Lot 1 DP 119519 - The Sutherland Hospital (adjoins Kareena Road and the railway corridor)
- Lot 1 DP 432283 - The Sutherland Hospital (Cnr Kingsway and Kareena Road)
- Lot 1 DP 398975 - Ambulance NSW (adjoins Kareena Road to the west)

The 3 lots are owned by Health Administration Corporation (HAC).



Figure 1 – The Sutherland Hospital site
 Source: NearMaps with Architectus edits (2020)

Existing Development, Services and Built Form

The Sutherland Hospital is a 375-bed metropolitan hospital and is part of the South Eastern Sydney Local Health District (SESLHD) that services the Sutherland Shire and southern Sydney. The hospital provides a range of services including, acute specialist services (surgical, emergency critical care, medical, women’s and children health), sub-acute services (aged care and rehabilitation) as well as ambulatory care.

The hospital is a Centre of Excellence for specialty surgeries including gastroenterology, orthopaedics and joint replacements. The campus was initially established in 1958 and has been significantly redeveloped with multiple additions and refurbishments to date. The existing main hospital building is two to three storeys in height.

In 2015, the Sutherland Hospital Redevelopment (SSD-6847) was approved by the Minister for Planning and subsequently completed in 2017. SSD-6847 represents the most recent major works on the site and included:

- New and expanded Emergency Department;
- New acute inpatient services unit, including a high dependency unit and a general medical unit; and
- Refurbishment of internal areas of the existing main hospital building.

The proposed addition comprises of a two (2) to three (3) storey extension at the north-western extent of the main hospital building, adjacent to the South Wing building, car park 1 and car park 3, with a frontage to Kingsway.

Refer to the aerial in **Figure 2** below and site photos overleaf.

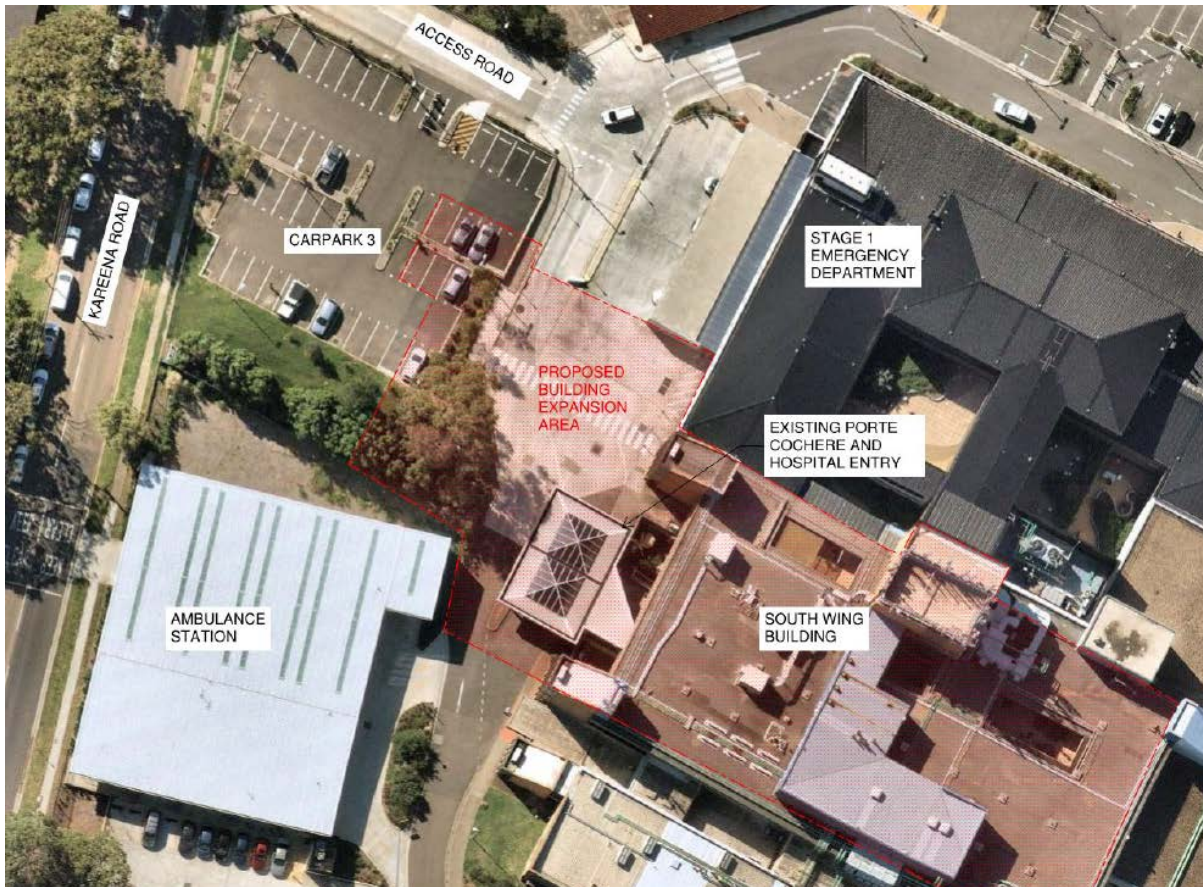


Figure 2 – Aerial photograph showing the immediate surrounds of the area subject to the proposed development
Source: NearMaps with ACOR edits (2020)

Refer to the existing site plan appended at **Attachment A**.



Looking south towards the Western Hospital Entrance



Looking north-west towards the NSW Ambulance Station



Looking north past the old ED drop off.



Looking east towards the western facade of The Sutherland Hospital



The entrance to the Emergency Department, part of the completed Sutherland Hospital redevelopment

Existing Site Access and Car Parking

There are three main access points to the site. General traffic can enter and exit the site from Kingsway (westbound only), the northern access point at Kareena Road (southbound only) and the southern access point at Kareena Road (all directions via roundabout). All loading activity occurs via the Kareena Road southern access which is located near the internal loading dock.

Ambulance egress is from the Ambulance Station onto Kareena Road and Ambulance ingress is only possible from the internal ring road via the Kareena Road roundabout. Ambulance vehicles frequently use the northern access point on Kareena Road to access hospital's emergency department, travelling from the north only.

The ring road around the site facilitates movements such as ambulances between the emergency department and the ambulance station together with movements between parking modules. All movements within the site can be facilitated without a return to the external road network.

Refer to the layout in **Figure 3** below for illustration of existing vehicular access.

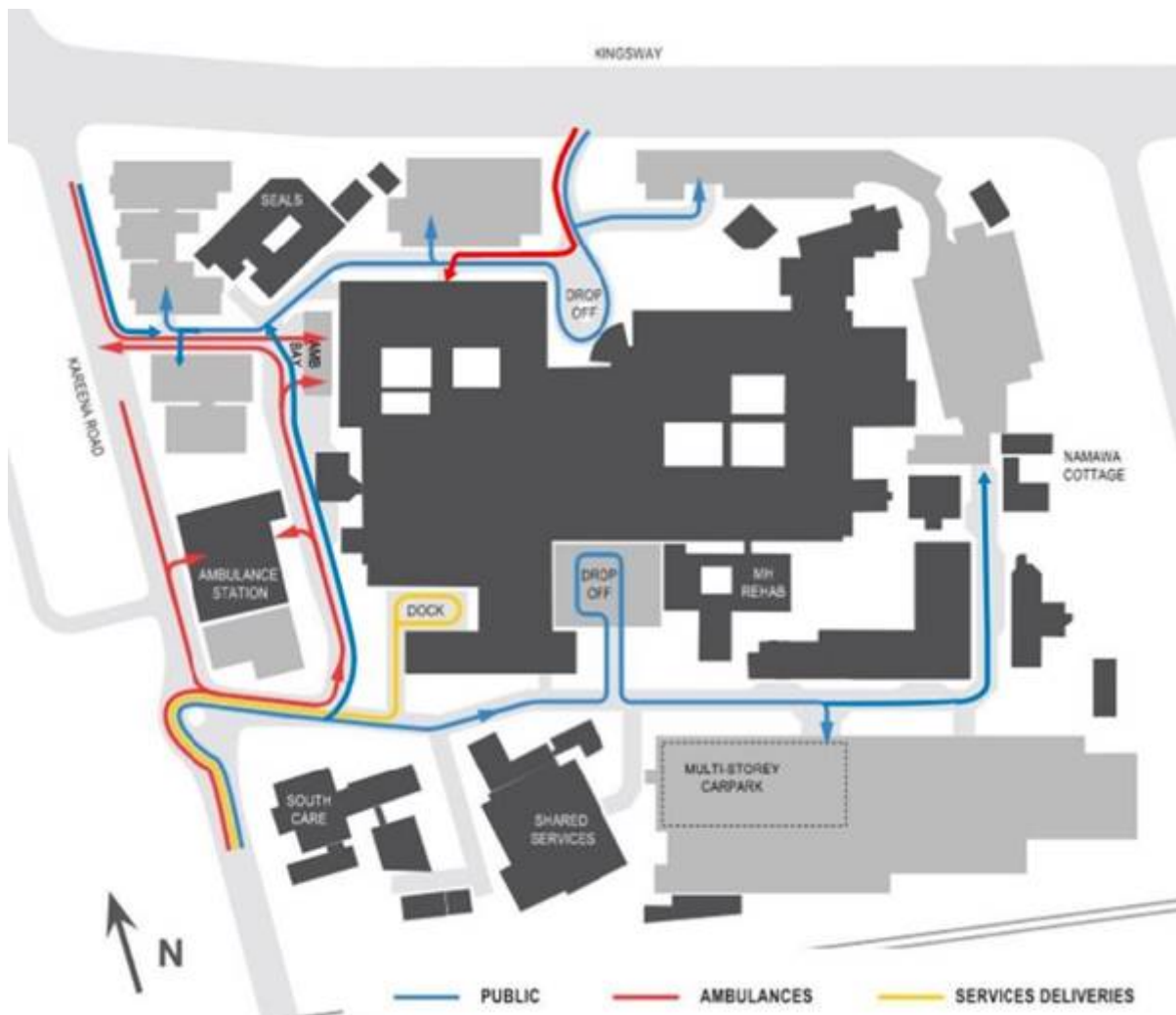


Figure 3 – Existing vehicular access into the site
 Source: Taylor Thomson Whitting (2020)

A right turn bay has been separately approved from Kareena Road, as part of a package of broader campus wide improvements under Part 5 of the EP&A Act, which will allow vehicles travelling northbound to turn into the existing north entry. This will enable vehicles to directly access the Emergency Department of the hospital.

The internal road located between the Ambulance Station and the hospital will be closed. NSW Ambulance have been consulted on this approach and are in support as it will provide an improved service and safety outcome for ambulance vehicles. The resultant vehicular access into the site is illustrated in **Figure 4** below:



Figure 4 – Existing vehicular access into the site

There are approximately 950 existing car parking spaces within the current Hospital campus. The capacity includes a combination of on-grade car parks across the site and a multi-storey car park located within the hospital campus to the southern alignment.

3 The Locality

The Sutherland Hospital is located in the suburb of Caringbah and is within the Sutherland Shire LGA and SESLHD. The site is approximately 750m north west of Caringbah town centre, 1.2km east of Miranda town centre and 22km south of the Sydney CBD.

The surrounding area is well serviced by various bus routes with bus stops located on Kingsway adjacent to the hospital entrance and at Kareena Road, approximately 50m south of the intersection approach. The site is located approximately 500m west of Caringbah railway station and 1km east of Miranda railway station – both stations are served by T4 passenger rail services which run at 15-minute intervals during peak hours.

The built form and land use character surrounding the site can be categorised by the following distinct areas:

- Kareena Private Hospital, north west of the site – 2 to 3 storeys;
- Allied health services, north west of the site – 2 storeys;

- Mix of medium density residential development to the east of the site – up to 6 storeys;
- Multi dwelling housing along Kareena Road – 1 to 2 storeys; and
- Low scale residential, north and south of the site – predominantly 1 to 2 storeys.

A cluster of health services facilities and allied services are located north west of the site at the intersection of Kingsway and Kareena Road.

Sutherland Shire Council’s Local Strategic Planning Statement was finalised on 15 September 2020 and identifies the area immediately east of Sutherland Hospital as an emerging strategic health precinct (the ‘Caringbah Medical Precinct’).

Sutherland Local Environmental Plan 2015 (SLEP) provides additional height and FSR bonuses for development for the purposes of a health services facility within the adjoining Caringbah Medical Precinct. Refer to **Section 5** below and **Figure 5**.



Figure 5 – Surrounding locality
 Source: Nearmap, Architectus edits (2020)

4 Description of Proposed Development

Scope of Proposed Works

This request seeks the environmental assessment requirements for an SSD application for The Sutherland Hospital Operating Theatre Upgrade Project, comprising alterations and additions to the existing main hospital building and associated works.

The Project will deliver a world-class operating facility in the heart of South Eastern Local Health District. The new facility will increase theatre capacity, improve efficiencies and access to services and enable implementation of new models of care and surgical clinical pathways.

The Project will provide the Hospital with the opportunity to meet increased surgical demand due to numerous factors including population growth and ageing population as well as providing additional medical services and an upgrade to the existing infrastructure.

The project also includes a new MRI suite that will improve access to care and provide more timely access to care for urgent cases. An onsite MRI service will reduce average length of stay, enhance patient outcomes and provide a better overall patient experience.

The scope of the proposed works the subject of this SSD application includes the following:

- Alterations and additions to the existing South Wing building west towards the Ambulance Station, including:
 - Additional operating theatres;
 - Additional endoscopy suites;
 - New Magnetic Resonance Imaging (MRI) space;
 - New Central Sterilising Services Department (CSSD);
 - Surgical short stay unit;
 - Post- Anaesthesia Care Unit (PACU), recovery and other perioperative clinical and supporting spaces;
 - Facilities for admission and discharge;
 - Refurbishment of Level 3;
 - Associated Staff Amenities.
- Earthworks and demolition;
- Tree removal and landscaping works.

The proposal will enable continuous operation of existing facilities and minimise disruption to the overall operation of the hospital.

Refer to indicative site plan at **Figure 6** below and **Attachment B**.

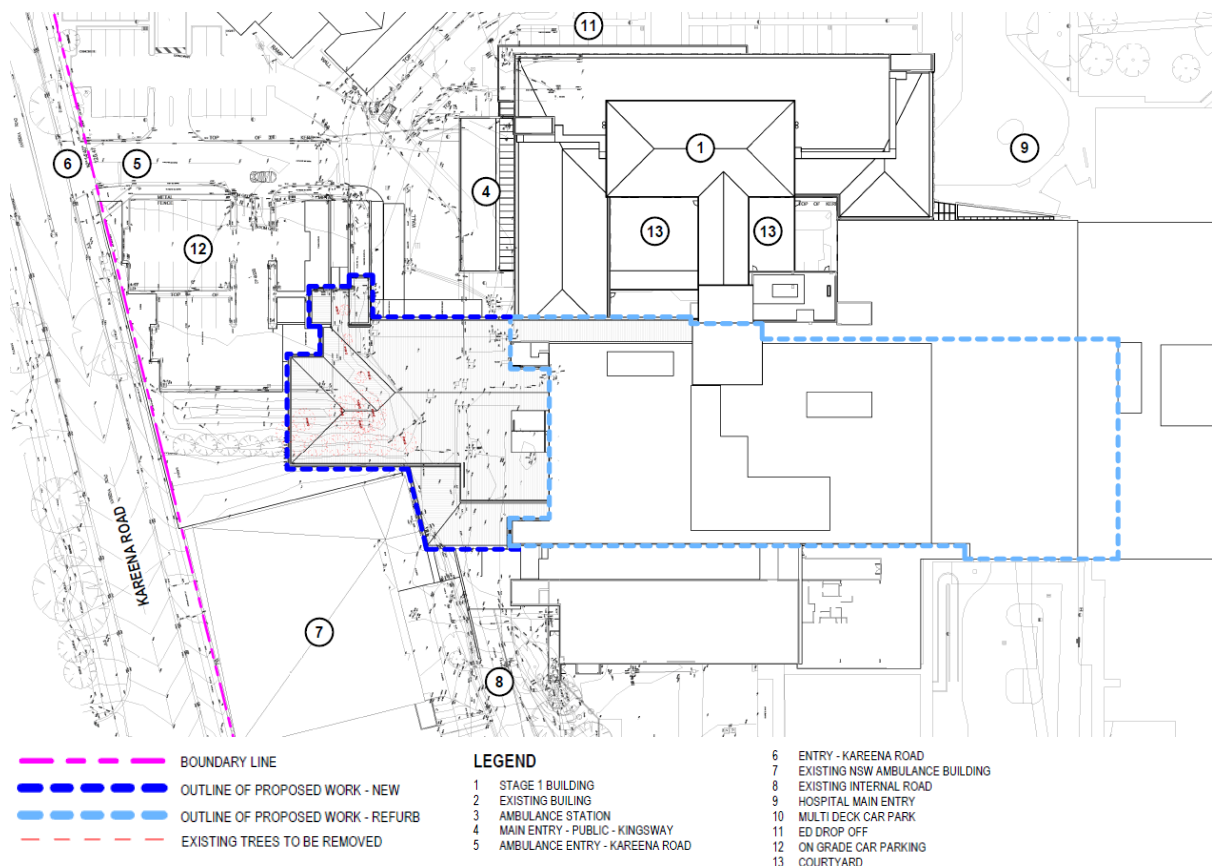


Figure 6 – Indicative site plan extract. The indicative extent of the proposed extension is shown in dark blue dash; indicative location of alterations to existing hospital shown in light blue dash. Outer site boundary line shown in pink dash.

Source: HDR Architecture (2020)

Height, Bulk and Scale of the Development

The Project is a combination of new extension (extending west of the South Wing building and the Emergency Department) and the refurbishment of the existing South Wing building's Level 3.

The height, bulk and scale of the new extension will respond to the immediate built form context and the existing hospital building, which is part 3 to 4 storeys. The facade design of the new extension is expected to be consistent with the recently completed Emergency Department.

The proposed built form will be generously set back from the surrounding streets, being approximately 23m from Kareena Road and 88m from Kingsway. An existing car park will predominantly be maintained and together with new landscape works will act as a buffer between Kareena Road and the new extension.

In response to the GANSW 'Better Placed' document, the siting of the building to the west of the existing hospital has been carefully considered to respect the surroundings, connect to existing thoroughfares and enable a positive outlook from the building. The new expansion has been sited to link all new services to the existing building with minimal disruption to existing site services.

The new expansion establishes itself within the context of the existing hospital. A proposed lift and stair core, located on the north-western corner of the new extension, will act as an anchor to the new building allowing the central zone to bridge across the existing road.

Building elements such as fire stairs and lift core will articulate the building and extend the building towards the ground. A glazed curtain wall associated with circulation routes within the building will allow activation of the façade and encourage natural surveillance over the surrounding area.

The overall height of the building will be established through the adoption of best practice floor-to-floor heights suited to the services and infrastructure requirements of a contemporary health service building. The form, height and massing of the building will respond to the proposed staging and growth of clinical services as well as to the existing height and scale of the new Emergency Department completed in 2017.

The Emergency Department is contemporary in nature and uses specific elements to break up and create interest within the building form. These include the egress stair towers and the carved undercroft elements. As a response to this, the new building will reciprocate these elements to ensure continuity with the new hospital vernacular established in 2017.

5 Strategic Planning Context

The relevant strategic planning policies that will apply to the proposed development are identified in **Table 1**.

Table 1: Strategic Planning Context

Strategic Policy	Description	Comment
NSW Premier's Priorities	<p>The Premier's Priorities are 14 directions reflecting the NSW Government's whole-of-government approach to addressing important issues for NSW.</p> <p>The Project is consistent these relevant priorities:</p> <ul style="list-style-type: none"> • Improving the Health System – Improving Service Levels • Improving the Health System – Improving Outpatient and Community Care • Building infrastructure; • Jobs closer to home; and • Increased business investment. 	<p>The proposal will provide for greater integration of services as part of the operating theatre upgrade and create greater efficiencies by incorporating state of the art facilities and equipment that will reduce waiting times by improving capacity.</p> <p>The proposal will create both construction jobs and operational jobs which will facilitate the growth and support of a skilled health related workforce in the region.</p>
State Infrastructure Strategy 2018-2038	<p><i>The State Infrastructure Strategy 2018 – Building Momentum State Infrastructure Strategy 2018-2038</i> (the Strategy) sets out Infrastructure NSW's advice on the current state of NSW's infrastructure needs and priorities over the next 20 years. The Strategy focuses on multiple sectors and provides strategies and solutions to advance infrastructure within</p>	<p>The proposal will contribute to responding to those demands by providing improved public healthcare services in the region.</p>

Strategic Policy	Description	Comment
	<p>each of the sectors. The main objective of the Strategy is to enable the NSW Government to plan and deliver infrastructure successfully.</p> <p>The strategic objective for the Health sector is:</p> <ul style="list-style-type: none"> Plan and deliver world-class health infrastructure that supports a 21st century health system and improved health outcomes for the people of NSW 	
<p>NSW State Health Plan Towards 2021</p>	<p>The NSW State Health Plan: Towards 2021 (State Health Plan) provides a strategic framework to unite existing plans, programs and policies regarding State-wide health services.</p> <p>The State Health Plan identifies four key strategies, including:</p> <ul style="list-style-type: none"> Supporting and developing our workforce Supporting and harnessing research and innovation Enabling eHealth Designing and building future-focused infrastructure. 	<p>The proposal supports the State Health Plan as follows:</p> <ul style="list-style-type: none"> Operation of the new operating theatre and MRI will be a catalyst for creating new jobs and will support eHealth objectives. The proposal will be designed and built as future focussed infrastructure.
<p>Better Placed – Government Architect NSW</p>	<p><i>Better Placed: An Integrated Design Policy for the Built Environment of New South Wales</i> is the Government Architect's (GANSW) state-wide design policy to ensure the delivery of high-quality urban design and better places. The document will be considered in the EIS, taking into account the principles and directions for new developments and the implications for the proposed redevelopment.</p>	<p>GANSW has been and will continue to be consulted as part of the Project development.</p>
<p>Greater Sydney Region Plan: A Metropolis of Three Cities</p>	<p>The Greater Sydney Region Plan (the Plan) provides the overarching strategic plan for growth and change in Sydney.</p> <p>The Plan identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.</p>	<p>The proposal is consistent with the objectives of the Plan and focuses on the expansion of health facilities to service Sydney's growing population.</p>

Strategic Policy	Description	Comment
	<p>The Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability.</p>	
<p>South District Plan</p>	<p>The <i>South District Plan</i> was released by the Greater Sydney Commission in March 2018.</p> <p>The Plan identifies that the Sutherland LGA will have the second largest increase in population in an LGA within the South District, with a projected 13% increase to 2036.</p> <p><i>Planning Priority S13</i> focuses on “Providing services and social infrastructure to meet people’s changing needs”, with the objective of delivering services and infrastructure to meet communities’ changing needs.</p>	<p>The proposal will contribute to the success of Planning Priority S13 as it enables Sutherland Hospital to better service the health needs of the existing and future population of the South District.</p>
<p>Sutherland Local Strategic Planning Statement</p>	<p>The <i>Sutherland Local Strategic Planning Statement (LSPS)</i> was finalised on 15 September 2020 and establishes a vision and planning principles to guide Council’s land use decisions for the next 20 years.</p> <p>The LSPS sets Planning Priority 11: to grow the Caringbah Medical Precinct, which includes the precinct surrounding Sutherland Hospital. This planning priority encourages collaboration between health services stakeholders and Council and look for opportunities to improve employment in the medical sector in the Caringbah Medical Precinct.</p>	<p>The proposed development will not only provide additional capacity to the hospital to meet an increasing and ageing population with services delivered in a more timely manner, but it will also facilitate the intent of this planning priority by providing additional jobs in both the construction and health services sector.</p>

The EIS will assess the proposed development against the relevant strategic planning policies.

6 Statutory Planning Context

This section provides an outline of the relevant statutory planning controls that apply to the proposed development. A thorough assessment against the relevant legislation will form part of the EIS.

6.1 Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The Commonwealth EPBC Act legislates the provisions for the assessment of actions likely to have a significant impact on Matters of National Environmental Significance (MNES) listed under the Act.

The EPBC Act provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places. Based on the proposed scope of works for the proposal, it is not expected that any significant impacts to MNES will occur.

6.2 Environmental Planning and Assessment Act 1979 (EPA Act)

Part 4, Division 4.1 of the EPA Act establishes the assessment framework for SSD. Under section 4.38 of the EPA Act, the Minister is the consent authority for SSD.

Section 4.12(8) of the EPA Act requires an EIS to accompany an SSD application in the form prescribed by the Environmental Planning and Assessment Regulation 2000 (EPA Regulation).

6.3 Biodiversity Conservation Act 2016 (BC Act)

Key objectives of the BC Act are to conserve biodiversity at bioregional and State levels and to maintain the diversity and quality of ecosystems and enhance their capacity to adapt to change and provide for the needs of future generations.

A Prescribed Ecological Actions Report (PEAR) has been prepared to assess the likely impacts of the proposal on species and ecological communities present on the site, and whether the proposal requires a Biodiversity Development Assessment Report (BDAR) because it is a likely trigger to entry into the Biodiversity Offsets Scheme identified in section 7.4 of the BC Act.

On the basis of the preliminary findings, it was concluded that none of the three thresholds for entry into the Biodiversity Offsets Scheme are triggered by the proposal, and consequently a report prepared using the Biodiversity Assessment Method is not recommended.

Consequently, a BDAR Waiver is sought as part of this Request for SEARs, pursuant to section 7.9(2) of the Biodiversity Conservation Act 2016 with the SSD and will include an assessment of significance in accordance with the EPBC Act and BC Act. Refer to Request for BDAR Waiver and PEAR appended at **Attachment B**.

6.4 National Parks and Wildlife Act 1974 (NPW Act)

Where relevant, the requirements of the NPW Act will be addressed in the EIS including protection of Aboriginal and non-Aboriginal cultural heritage.

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

SEPP SRD identifies development or infrastructure types that are of state or critical significance. Under the Schedule 1, clause 14(1)(a) includes development for the purpose of hospitals that has a CIV over \$30 million. As the proposal has a CIV of more than \$30 million it is therefore SSD.

6.6 State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)

The ISEPP provides the legislative planning framework for infrastructure and the provision of services across NSW.

Clause 104 and Schedule 3 of ISEPP requires referral to the Roads and Maritime Services (now Transport for NSW) for a proposal that is for alterations and additions to a “Hospital” “with access to classified road or to road that connects to classified road (if access within 90m of connection, measured along alignment of connecting road)” with size or capacity of “100 or more beds”. It is noted that an additional capacity of less than 100 beds will result from the proposed development. Based on this, Clause 104 will not be triggered by the proposed SSD.

Clause 85 of ISEPP requires referral to Transport for NSW for development of land that is in or adjacent to a rail corridor, if the development:

- *Is likely to have an adverse effect on rail safety, or*
- *Involves the placing of a metal finish on a structure and the rail corridor concerned is used by electric trains, or*
- *Involves the use of a crane in air space above any rail corridor, or*
- *Is located within 5 metres of an exposed overhead electricity power line that is used for the purpose of railways or rail infrastructure facilities*

The proposed development is unlikely to cause any adverse impact on the rail corridor along the site’s southern boundary, rail infrastructure or the operation of rail services given that the subject works will be located more than 100m north of the rail corridor. No metal finish on the development will be proposed.

6.7 Other State planning policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SSD application:

- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33);
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55); and
- State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 (Vegetation SEPP)

6.8 Sutherland Shire Local Environmental Plan 2015 (SLEP)

The site is located within the Sutherland LGA and subject to the SLEP. The site is zoned SP1 Special Activities for the purpose of “Health Services Facility” (refer to **Figure 7** below). Development for the purpose of a hospital on the site is a permitted use in the SP1 zone.

This objectives of the SP1 Zone are to:

- *To provide for special land uses that are not provided for in other zones.*
- *To provide for sites with special natural characteristics that are not provided for in other zones.*
- *To facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land.*

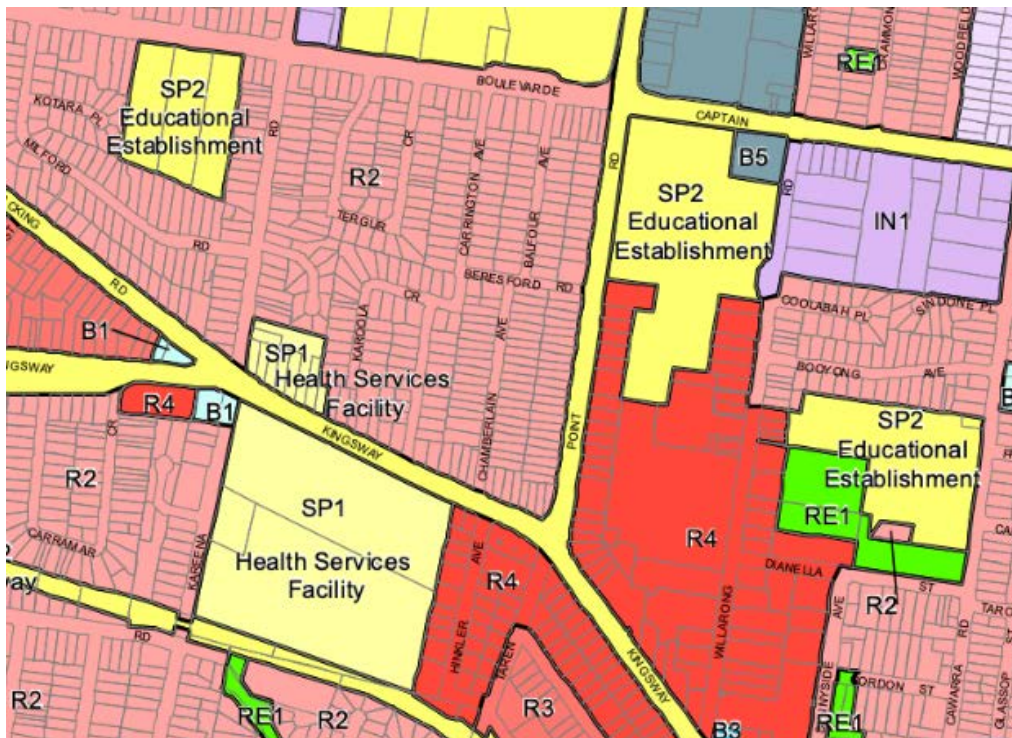


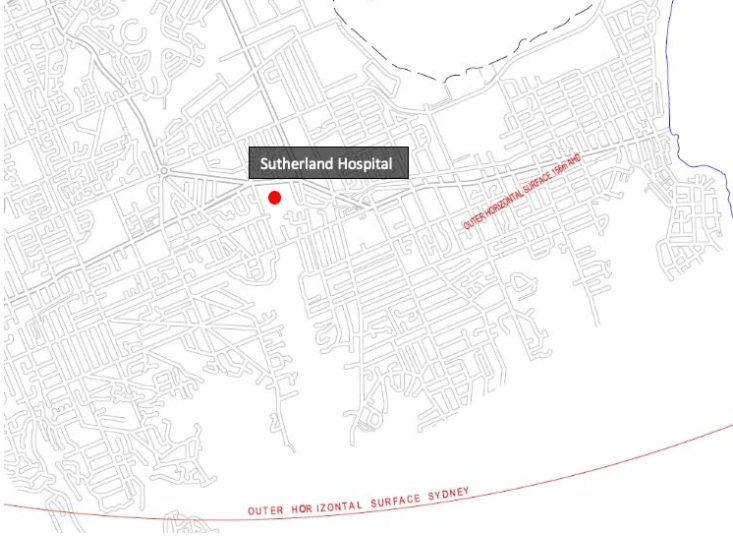
Figure 7 – Land zoning map extract.

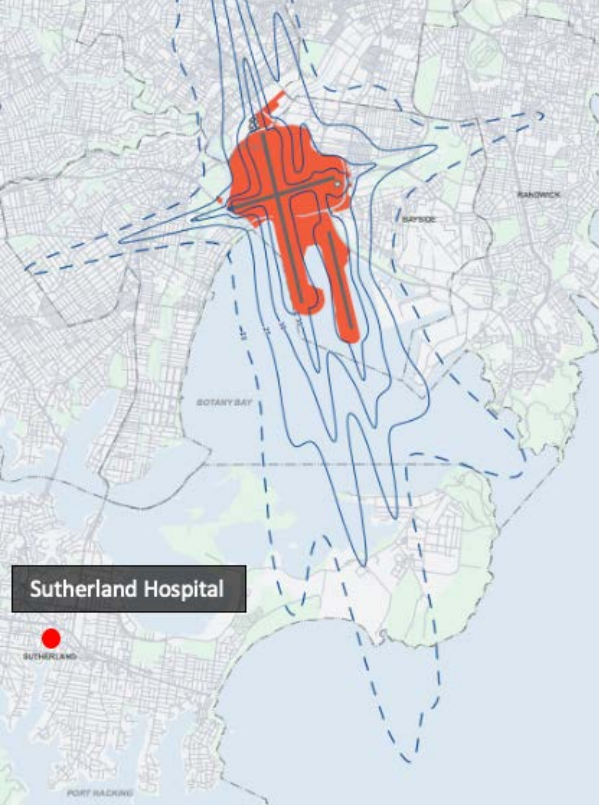
Source: Sutherland LEP 2015

Table 2 below provides a summary of the key relevant provisions in the SLEP that apply to the site. These matters will be addressed further as part of the EIS.

Table 2: Sutherland Local Environmental Plan 2015

Item	Control
<i>Height of buildings</i>	There is no maximum building height limit that is mapped under SLEP for the land.
<i>Floor Space Ratio</i>	There is no maximum Floor Space Ratio (FSR) control that is mapped for the site.
<i>Heritage</i>	There are no heritage items located on the site, or in the vicinity of the site. The site is neither in a heritage conservation area, nor is it on the section 170 Heritage Conservation Register or subject to an Interim Heritage Order
<i>Acid Sulfate Soils</i>	The site is not located in an area known to contain Acid Sulfate Soils.
<i>Airspace Operations</i>	The proposed works are subject to clause 6.12 Airspace operations under SLEP. Under this clause, a consent authority must not grant development consent to development that is a 'controlled activity' within the meaning of the <i>Commonwealth Airports Act 1996</i> .

Item	Control
	<p>A 'controlled activity' includes the construction or alteration of buildings or other structures that causes an <i>intrusion into prescribed airspace</i>.</p> <p>Sydney Airport's prescribed airspace is illustrated in the 'Sydney Airport Prescribed Airspace Obstacle Limitation Surfaces' Map (Figure 8).</p> <p>The site is located within the 'Outer Horizontal Surface' area which is subject to a surface level of 156m AHD. Clause 6.12 prevents any construction or alteration of buildings or other structures that results in a height greater than this prescribed airspace (156m AHD), unless the applicant has obtained approval for the controlled activity under regulations made for the purposes of Division 4 of Part 12 of the Airports Act 1996. The proposed building is not proposed to be greater in height than 156m AHD.</p>  <p>Figure 8 – Sydney Airport Prescribed Obstacle Limitation Surfaces Map Source: Sydney Airport, Architectus edits (2020)</p>

Item	Control
<p><i>Development subject to aircraft noise</i></p>	<p>The site is not subject to any ANEF contour within the Sydney Airport ANEF 2039 under the Sydney Airport Master Plan 2039. Clause 6.13 of SLEP is therefore not triggered. Figure 9 illustrates the location of the site in accordance with the Sydney Airport ANEF.</p>  <p>Figure 9 – Sydney Airport ANEF 2039 Source: Sydney Airport Master Plan 2039, Architectus edits (2020)</p>

7 Overview of Likely Environmental and Planning Issues

Key Planning Issues

The key environmental and planning issues that will need to be considered in the EIS are outlined in Table 3 below.

Table 3 Key Environmental and Planning Considerations

Environmental Issues	Response
Urban Design and Built Form	<p>The proposed hospital expansion subject to this Request for SEARs will be consistent in design and scale with the existing hospital building and the recently completed Emergency Department extension.</p> <p>An Architectural Design Statement will be prepared as part of the EIS. The assessment of the architectural quality and built form will focus on the height, scale, setbacks and building materials of the new development and their relationship to the surrounding built form context, particularly when viewed from Kareena Road which is the only interface with the public domain/street frontage. It will also include consideration of Crime Prevention Through Environmental Design (CPTED) principles and view impact / view analysis.</p>
Aboriginal Heritage	<p>Aboriginal Cultural Heritage Due Diligence Advice has been sought which found that Aboriginal archaeological sites or areas of Potential Archaeological Deposit (PAD) are unlikely to occur within the site.</p> <p>An Aboriginal Cultural Heritage Assessment Report (ACHAR) will accompany the SSD application to assess the potential for impacts upon Aboriginal cultural heritage. Details of consultation undertaken for the ACHAR will accompany the SSD application.</p>
Traffic, Access and Parking	<p>The hospital campus has frontage to a Classified Road (Kingsway). Notwithstanding no direct access is proposed to Kingsway, use of existing access to Kareena Road is within 90m of the Kingsway / Kareena Road intersection.</p> <p>A Traffic and Transport Impact Assessment will be undertaken as part of the EIS. This will include assessment of traffic generation and expected traffic impact, including impact on the classified road operation through SIDRA modelling. It will also address the proposed active transport access arrangements, and vehicular access for ambulance, service vehicles, staff and visitors to the site.</p> <p>A Preliminary Green Travel Plan will also be prepared to promote and maximise the use of sustainable modes of travel to and from the site.</p> <p>It is noted that the proposal is likely to increase the number of staff and visitors to the hospital. Notwithstanding this, given the existing</p>

Environmental Issues	Response
	<p>number of parking spaces (approximately 950 in total), a preliminary traffic study has indicated that the current provision of hospital parking is sufficient to accommodate the proposed development.</p> <p>A right turn bay has been approved under a separate pathway in accordance with Part 5 of the EP&A Act from Kareena Road, to allow vehicles travelling northbound to turn into the existing north entry. This would enable vehicles to directly access the Emergency Department of the hospital. The internal road located between the Ambulance Station and the hospital will be closed. NSW Ambulance have been consulted on this approach and are in support as it will provide an improved service and safety outcome for ambulance vehicles.</p>
Construction Management	<p>Sutherland Hospital must be kept operational throughout the duration of construction works. A Preliminary Construction Management Plan will be prepared to support the EIS.</p>
Construction Traffic	<p>A Preliminary Construction Traffic and Pedestrian Management Plan will be prepared as part of the EIS to outline proposed traffic control plans and truck routes in order minimise impacts on operation of the hospital and surrounding residential areas.</p>
Biodiversity	<p>A PEAR has been prepared to assess the likely impacts of the proposal on species and ecological communities present on the site, and whether the proposal requires a BDAR because it is a likely trigger to entry into the Biodiversity Offsets Scheme identified in section 7.4 of the <i>Biodiversity Conservation Act 2016</i>. On the basis of the preliminary findings, it was concluded that none of the three thresholds for entry into the Biodiversity Offsets Scheme are triggered by the proposal, and consequently a report prepared using the Biodiversity Assessment Method is not recommended.</p> <p>Consequently, a BDAR Waiver is sought as part of this Request for SEARs, pursuant to section 7.9(2) of the BC Act with the SSD and will include an assessment of significance in accordance with the EPBC Act and BC Act. Refer to Request for BDAR Waiver and PEAR appended at Attachment B.</p>
Arborist and Landscape	<p>An Arboricultural Impact Assessment will accompany the SSDA, assessing potential impacts to trees as a result of any works on the site.</p> <p>Landscape Plans and a Landscape Design Statement will also be prepared and include a tree retention/removal plan.</p>
Contamination	<p>A Preliminary Environmental Site Assessment has been undertaken to determine the extent of contamination on site. The findings have identified that there is a potential presence of fill material on site. As a result, the SSD will include a Phase 2 Detailed Site Investigation Report, which will address the requirements of SEPP 55.</p>

Environmental Issues	Response
Hazardous Building Materials	There is potential Asbestos Containing Material (ACM) within the existing hospital building subject to refurbishment. An Asbestos Survey will be carried out and is anticipated to be required together with an Asbestos Management Plan as conditions of consent.
Drainage, Stormwater and Civil/Structural Works	Both civil and hydraulic engineering plans will be addressed in the EIS and accompany the SSD to address drainage and stormwater disposal on the site. Other civil and structural documentation to be submitted with the SSDA will include a flooding statement (where relevant) and sediment and erosion control plans.
Socio-economic Impact	<p>The social and economic impacts resulting from the proposal will be detailed in the EIS. Anticipated social and economic benefits include:</p> <ul style="list-style-type: none"> • significantly improved health facilities for the community; • creation of construction and operational jobs; • direct and indirect benefits to the local economy; and • enhancement of the visual amenity of the hospital through development of well-designed, high quality buildings and associated facilities, along with significant landscaping.
Waste Management	A detailed Waste Management Plan (WMP) will be prepared and submitted with the EIS. The WMP will outline the anticipated quantities and streams of waste generated by the proposal during construction and operation as well as the intended management of waste in terms of storage, removal off-site and disposal.
ESD	The principles of Ecologically Sustainable Development (ESD) will be upheld by ensuring that s.1.3 of the EPA Act is addressed within the documentation to accompany the EIS/SSD.
Amenity	<p>The EIS and accompanying specialist reports will include a detailed assessment of amenity issues including:</p> <ul style="list-style-type: none"> • Construction and operational noise impacts; • Construction vibration and air quality impacts; • Overshadowing impacts; • Visual privacy impacts; • Pedestrian wind environment; and • Operational lighting and air quality impacts.

8 Consultation

Consultation has been undertaken to date by Health Infrastructure, the Project Manager and the consultant team for the proposed Theatre Upgrade Project. This consultation has included, and will continue to include (although not limited to):

- Government Architect NSW, through the NSW State Design Review Panel (SDRP) process;
- Ambulance NSW;
- Transport for NSW;
- Sutherland Shire Council; and

- Aboriginal community and Aboriginal stakeholders.

Further consultation will continue with key stakeholders and agencies during the preparation and assessment of the EIS. Additional stakeholders include:

- Surrounding landowners and the community;
- Heritage NSW;
- Sydney Airport Corporation Limited (SACL);
- Civil Aviation Safety Authority (CASA);
- EPA

The EIS will be placed on public exhibition once the Department has reviewed the EIS to confirm that it has satisfactorily responded to each of the issues identified in the SEARs. The key stakeholders will be provided with an additional opportunity to review the proposal, including the final development plans and the detailed specialist studies and assessment reports accompanying the final EIS.

9 Request for SEARs

On the basis that the proposal meets the criteria identified in Schedule 1 clause 14(a) of SEPP SRD, Health Infrastructure formally requests that the Planning Secretary issue the SEARs to facilitate the preparation of the EIS accompanying the proposed SSD for The Sutherland Hospital Operating Theatre Upgrade Project at Nos. 106 and 126 Kareena Road (Cnr Kingsway), Caringbah.

The proposal is to increase theatre capacity, improve efficiencies and access to services, and enable implementation of new models of care and surgical clinical pathways. In addition, the proposal will provide The Sutherland Hospital with the opportunity to meet increased surgical demand due numerous factors including future population growth and ageing population as well as providing additional medical services and an upgrade to the existing infrastructure.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS. Should you have any queries regarding the above, please do not hesitate to contact Rachel Mitchell, A/ Manager, Planning on 0438 220 252.

We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely



Rebecca Wark
Chief Executive

Attachment A – Indicative plans and elevations prepared by HDR Architects

Attachment B – Request for Biodiversity Development Assessment Report Waiver and Prescribed Ecological Actions Report prepared by Abel Ecology