

28 October 2019

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
320 Pitt Street
Sydney, NSW, 2000

Dear Mr Betts

RE: LIVERPOOL HOSPITAL – INTEGRATED SERVICES BUILDING AND REFURBISHMENT WORKS REQUEST FOR SECRETARY’S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

This request is made on behalf of Health Infrastructure NSW (HI) as the proponent for the proposed construction and operation of an Integrated Services Building and refurbishment of the existing Clinical Services Building at Liverpool Hospital. As the proposal is for the purposes of a Health Services Facility that has a capital investment value in excess of \$30 million, in accordance with Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* it is State Significant Development for the purposes of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The purpose of this letter is to request Secretary’s Environmental Assessment Requirements (SEARs) in accordance with section 5.15 of the EP&A Act for the preparation of an Environmental Impact Statement (EIS) for the proposed development. To support this request, outlined below is an overview of the proposed development, the statutory context, and the key likely environmental and planning issues associated with the proposal.

Concept Architectural Plans have been prepared by Fitzpatrick and Partners and are included at **Attachment A**.

1.0 Background

Liverpool Hospital is the district hospital for the local catchments of Liverpool and Fairfield and is a tertiary referral hospital for all of South Western Sydney Local Health District (SWSLHD). Within NSW, Liverpool Hospital has the highest number of emergency department presentations, is one of seven major trauma units in NSW for adults and one of three adult Brain Injury Rehabilitation Units in Sydney. It has tertiary affiliations with the University of NSW, University of Wollongong and Western Sydney University, and also provides practical education programs for medical practitioners, nurses and other health professionals.

In June 2018, the NSW Government announced \$740 million of funding for the development of a world class health, research and academic precinct in Liverpool. The redevelopment will increase the inpatient bed numbers, as well as expanding tertiary and quaternary services.

1.1 Hospital Infrastructure Works

A range of infrastructure improvement works are occurring across the broader Hospital campus under a separate application via Part 5 of the EP&A Act and as Complying Development under *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). The infrastructure improvement works are required to ensure the ongoing operation of the Hospital and are separate to the subject SSD works, and include:

- Demolition of buildings;
- Installation and augmentation of services;
- Alterations and additions to health service facilities;
- Tree removal;
- Realignment of internal roads;
- Relocation of short stay car parking; and
- Landscaping.

1.2 Multi-storey Car Park

The construction and operation of a multi-storey car park is proposed at Liverpool Hospital and will be the subject of a separate SSD application. The new car park will service the current and future parking demands for Liverpool Hospital.

2.0 The Site

2.1 Locational Context

Liverpool Hospital is located within the Liverpool Central Business District (CBD), on the corner of Elizabeth Street and Goulburn Street, Liverpool, within the Liverpool LGA. The Hospital site is approximately 27km south west of the Sydney CBD and has an area of approximately 14.5ha, including land east and west of the Main Southern Railway, which forms the eastern and western campus.

Liverpool Hospital is within proximity of transport services and key road links including Liverpool Train Station approximately 700m to the south, the Hume Highway to the north and the M5 South Western Motorway to the south. It is located opposite Bigge Park, which is a large public park and is adjacent to Liverpool TAFE.

The Hospital's locational context is shown at **Figure 1** and the existing Hospital campus is shown at **Figure 2**.

The Hospital is located in a cluster of health and education uses within the north-east of the Liverpool CBD. It comprises a number of buildings associated with the Hospital campus situated around an internal road network. The Hospital has a maximum capacity of 855 beds, 23 operating rooms, 60 critical care beds and provides a range of state-wide services in areas such as critical care and trauma, neonatal intensive care and brain injury rehabilitation.

2.2 Site Description

The proposed works are located in the western portion of the Hospital campus and is currently occupied by a range of existing Hospital buildings.

The site is legally described as Lot 501 in DP1165217. The land is owned by NSW Health Administration Corporation.

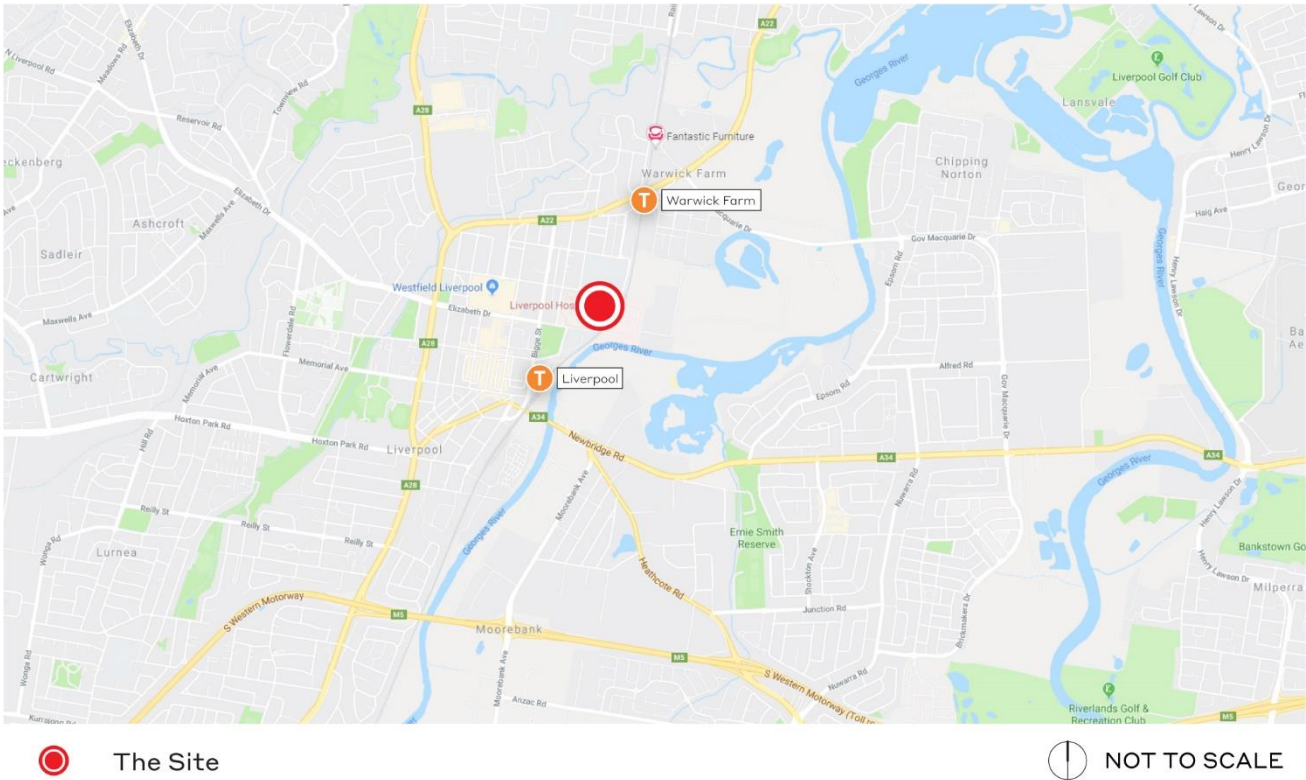


Figure 1 Locational Context

Source: Googlemaps / Ethos Urban



Figure 2 Liverpool Hospital campus

Source: Nearmap / Ethos Urban

3.0 Description of the proposed development

The SSD will seek consent for the construction and operation of a new Integrated Services Building and refurbishment of the Clinical Services Building. Specifically, the proposal will seek approval for:

- Construction and operation of a new 8 storey Integrated Services Building to provide:
 - Expanded Emergency department;
 - New Women's and Paediatric services;
 - New Cancer Treatment Centre;
 - New support services including Pathology, Satellite Medical Imaging and Pharmacy;
 - New education and teaching spaces;
 - New retail facilities; and
 - New basement loading dock.
- Refurbishment of existing buildings to provide:
 - Expansion and reconfiguration of the existing Emergency Department;
 - Reconfiguration of existing Operating Theatres and Same Day Surgery;
 - Caroline Chisholm Building repurposed for office accommodation;
- New Hospital entry and drop off;
- Skybridge link over Campbell Street to the Ingham Institute;
- Construction of new internal access roads and links;
- Expansion of Ambulance bays on Elizabeth Street;
- Creation of a shared zone on Campbell Street;
- Campus wayfinding and signage;
- Tree removal;
- Landscaping;
- Utilities services and amplification works; and
- Site preparation civil works.

Concept Architectural Plans prepared by Fitzpatrick and Partners are provided for information at **Attachment A**. The site location and Ground Level plan is shown at **Figure 3** and **Figure 4** and 3D massing of the proposed development is shown at **Figure 5**.

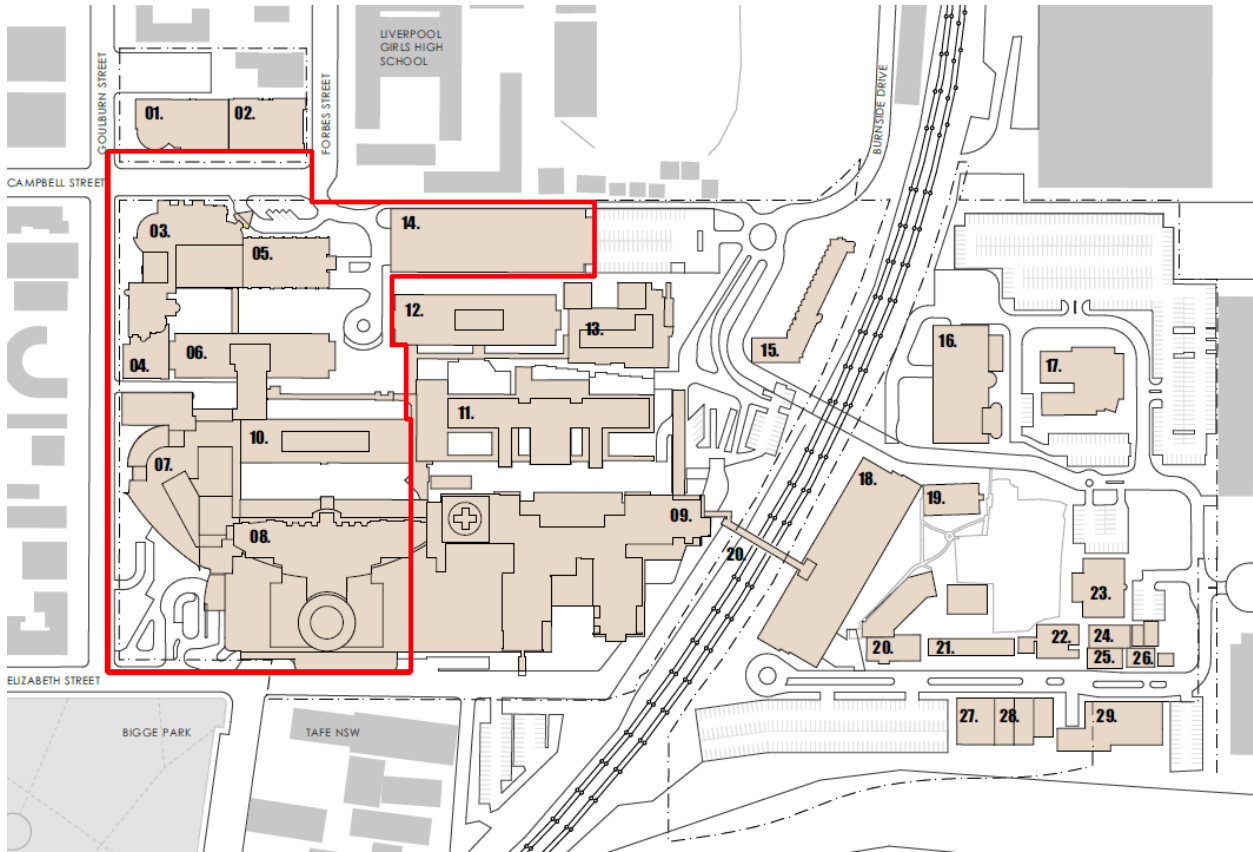


Figure 3 Site location outlined red

Source: Fitzpatrick and Partners

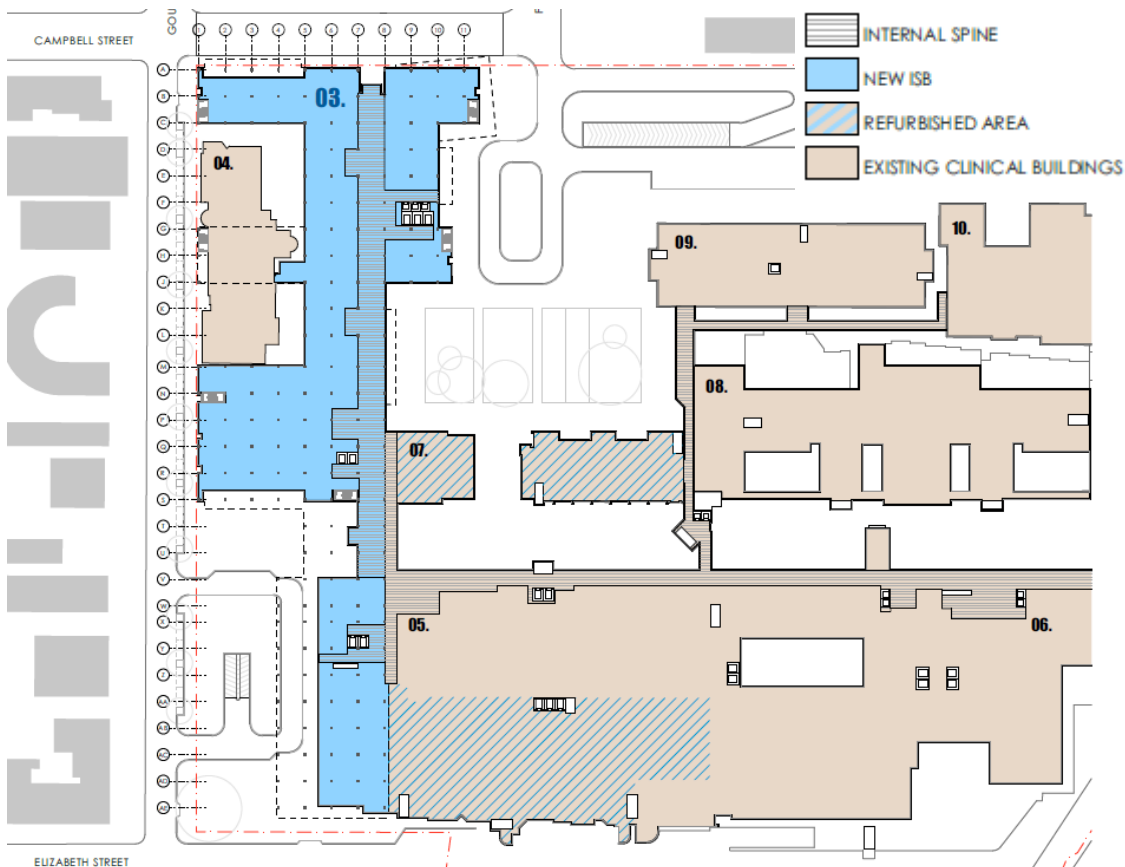


Figure 4 Ground floor plan

Source: Fitzpatrick and Partners



Figure 5 3D massing of proposed development – viewed from corner of Goulburn / Campbell Streets

Source: Fitzpatrick and Partners

3.1 Project Value and Job Creation

The estimated projected value is \$740 million.

The project will result in the following job creation:

- 250 construction jobs; and
- approximately 500 full time equivalent.

4.0 Strategic Need for the Project

Liverpool Hospital currently has 713 inpatient beds and provides a range of tertiary and quaternary services. The Liverpool Hospital Clinical Services Plan 2031 (CSP) predicts substantial growth in services demand to 2025/26 as a result of population increase, major infrastructure in South Western Sydney and the poor health status of people within the LGA and surrounding areas. These increases result in demand well beyond the Hospital's present infrastructure capacities.

Population projections indicate that the population of SWSLHD will increase from 966,450 people in 2016 to 1.285 million people in 2031. This is an increase of 33% over the fifteen years. The Liverpool LGA population will grow by 41% by 2031, with an additional 86,950 people, a growth rate twice that expected for the rest of NSW.

The Hospital also plays a role as a tertiary referral hospital for all of SWSLHD. It provides critical care for rural retrieval catchments and regional catchment for quaternary services.

Accordingly, there is urgent need to upgrade and expand the existing service offering of Liverpool Hospital to better meet the needs of the South Western District and to address future demand for services from a growing and ageing population.

The CSP identifies future models of care to best meet the increasing and dynamic health care needs of the community. These new models of care will be provided via integrated services that allow staff efficiencies and optimal patient flows. The redevelopment of the Hospital to deliver an integrated services facility along with an

expansion of facilities will ensure the Hospital can increase the inpatient bed numbers, as well as expanding tertiary and quaternary services.

5.0 Planning Context

5.1 Strategic Planning Framework

This section provides a summary of the key strategic plans as they apply to Liverpool Hospital. The proposed Hospital redevelopment is consistent with the outcomes of key relevant strategic plans at **Table 1**.

Table 1 Consistency with strategic plans

Strategic Plan	Comment
Greater Sydney Regional Plan	<p>The Greater Sydney Regional Plan (the Regional Plan) is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area over the next 40 years. Under the Regional Plan, Sydney will be made of three cities, with Liverpool forming part of the Western Parkland City along with Greater Penrith and Campbelltown-Macarthur. Liverpool is designated as part of the 'Metropolitan' cluster (centre) of the Western City in the centres hierarchy.</p> <p>The centre of Liverpool is to be the foundation for growing a health and education precinct that will support the growing Western City over the next 20 years. The Plan seeks to anchor university presence in Liverpool around the Government's investment in hospitals to facilitate the emergence of a health and education precinct. Liverpool is to be better connected to the rail network to help drive the education and commercial strengths of the CBD. This is further supported by Objective 24 where the NSW Government will decentralise more than 3,000 public sector jobs to Western Sydney, including targeting Liverpool.</p>
Western City District Plan	<p>The Western City District Plan sets out the planning priorities and actions to manage growth and change in the Western City District. It is a guide for implementing the Region Plan, at a district level, and is a bridge between regional and local planning. The District Plan informs local strategic planning statements, preparation of Local Environmental Plans and assessment of Planning Proposals, community strategic plans and policies.</p> <p>Planning Priority W9 specifically refers to the growth and strengthening of the Liverpool 'Metropolitan Cluster'. Liverpool is identified as a 'Collaboration Area' where the key aims include developing smart jobs around the health and education precinct.</p>
Growing Liverpool 2023	Growing Liverpool 2023 is Liverpool's 10-year community strategic plan. It is based on a set of principles that guide delivery of the vision for Liverpool and aligns with the Government's strategic policy directions. The strategic plan is somewhat out of date and responds to the strategic plans that have been superseded by the Regional and District Plans. It is expected that the Growing Liverpool 2023 will be updated in the coming years to align with the actions and priorities in the Regional and District Plan.
Georges River Precinct Plan	The Plan aims to extend the Liverpool City Centre to create better connections to and through the river and aims to make Liverpool into a 'true river city'. The Plan outlines a high-level vision for the potential regeneration of the Moorebank Precinct, opposite the Liverpool CBD. The Plan does not introduce any planning controls and rather provides a framework for future planning guidance.

5.2 Environmental Planning and Assessment Act 1979

The EP&A Act establishes the assessment framework for SSD. Under Section 4.38 of the Act the Minister for Planning and Public Spaces is the consent authority for SSD. Section 4.12(8) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

5.3 Roads Act 1993

As Campbell Street is a Council owned road, a Section 138 approval will be required to implement the shared way.

5.4 State Environmental Planning Policy (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the Policy provides that State Significant Development includes:

Development that has a capital investment value of more than \$30 million for any of the following purposes:

- (a) hospitals,*
- (b) medical centres,*
- (c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).*

As the proposal is for the purposes of a hospital that has an estimated Capital Investment Value in excess of \$30 million, it is SSD.

5.5 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 (Infrastructure) 2007.*

5.6 Liverpool Local Environmental Plan 2008

The site is zoned SP2 Infrastructure – Health Services Facility and Educational Establishment in the *Liverpool Local Environmental Plan 2008* (LLEP 2008). A Health Services Facility is defined as:

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

- (a) a medical centre,*
- (b) community health service facilities,*
- (c) health consulting rooms,*
- (d) patient transport facilities, including helipads and ambulance facilities,*
- (e) hospital.*

On that basis the proposal is permissible.

Table 2 below provides a summary of the key relevant provisions in the LLEP 2008 that apply to the site. These matters will be addressed further as part of the EIS.

Table 2 Liverpool Local Environmental Plan 2008

Item	Control
Height of Buildings	35m
Floor Space Ratio	2.5:1
Infrastructure development and use of existing buildings of the Crown	<p><i>This Plan does not restrict or prohibit, or enable the restriction or prohibition of, the carrying out of any development, by or on behalf of a public authority, that is permitted to be carried out with or without development consent, or that is exempt development, under State Environmental Planning Policy (Infrastructure) 2007.</i></p> <p>Development standards that apply to the site under LLEP 2008 cannot serve to restrict the proposed development which is permitted under the ISEPP. Notwithstanding, there will be a merit-based consideration of the proposed building in the EIS.</p>
Heritage	<p>Whilst the Hospital site itself is not identified as an item of heritage significance it is partially located within the Bigge Park Conservation Area on the Heritage map.</p> <p>The site is located close to a number of local heritage items in the area, including:</p> <ul style="list-style-type: none"> • The local street network identified as 'Plan of Town of Liverpool (early town centre street layout–Hoddle 1827)'; • Liverpool College (TAFE) site, including Blocks A–G, chimneystack, fences, gatehouses and archaeological features (formerly Liverpool Hospital and Benevolent Asylum); • Bigge Park; and • Cast-iron letterbox (close to the corner of College and Elizabeth St).
Land Reservation	The site is not identified by the land reservation acquisition map.
Flood planning	The western campus is identified as being Flood Prone however it is not identified as being within a flood planning area.
Acid Sulfate Soils	The site is identified as being located on land with Class 5 Acid Sulfate Soil.
Key sites	The site is identified by the Key Sites map which seeks to protect the Hospital helicopter airspace by restricting development that intrudes into the Hospital OIS contour - 42.71.
Sun access in Liverpool City Centre	<p>Sun access to Bigge Park is protected by the following clause:</p> <ul style="list-style-type: none"> • Land within 9m of the public right of way on the northern side of Elizabeth Street, opposite Bigge Park, between Bigge Street and College Street is limited by a maximum height of 20 metres.
Design excellence in Liverpool City Centre	Development involving the construction of a new building or external alterations to an existing building in the Liverpool City Centre is to exhibit design excellence.

6.0 Environmental and Planning Issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the EIS.

6.1 Built form and Urban Design

The proposed scheme will be subject to an assessment with regard to the siting, height and massing of the development in the context of the surrounding landscape. Consultation will be undertaken with the NSW Government Architect in accordance with the State Design Review Panel process.

6.2 Environmental Amenity

The EIS will assess any amenity impacts on adjoining properties including acoustic impacts, visual privacy and overshadowing and how the proposal intends on mitigating impacts where they occur.

6.3 Traffic and Parking

Traffic and parking analysis will be undertaken to determine the current daily and peak hour vehicle, public transport, pedestrian and bicycle movements. This will include an analysis of the provision of staff and visitor car parking at the Hospital and assess the existing and future transport needs associated with the Hospital.

The assessment will also consider access arrangements and measures to mitigate any associated traffic impacts. A Green Travel Plan will also be included to address ways in which sustainable and active transport modes can be encouraged and used by visitors and staff.

6.4 Heritage

The site is partly located in a Heritage Conservation Area and is proximate to a number of local heritage items. A Heritage Impact Statement and an Aboriginal Cultural Heritage Assessment Report (ACHAR) will be prepared to assess the impacts of the proposed development on the heritage significance.

6.5 Geotechnical, Contamination and Hazardous Materials

A geotechnical investigation of the site will be undertaken where new buildings are proposed. Recommendations for the substructure of the buildings will be considered in the detailed design of the buildings and will be addressed. Any validation requirements relating to ground conditions to ensure the site is suitable for the intended use will be adopted.

Relevant investigations will be undertaken in accordance with SEPP 55 – Remediation of Land, Management Land Contamination – Planning Guidelines, and SEPP 33 – Hazardous and Offensive Development. The assessment against the SEPPs will be submitted with the SSD Application.

6.6 Noise and Vibration

A Noise and Vibration Assessment will be undertaken to assess the main noise and vibration generating sources during construction and operation and outline measures to minimise and mitigate the potential noise impacts on surrounding sensitive receivers.

6.7 Biodiversity

A Biodiversity Development Assessment Report (BDAR) will be prepared to assess the vegetation and biodiversity value of the site and any impacts of the proposed development.

6.8 Environmentally Sustainable Development

An assessment will be undertaken to detail how the proposed new Integrated Services Building will incorporate ESD principles in the ongoing operation phases. It will include a framework to consider and reflect national best practice in sustainable building principles.

6.9 Infrastructure and Servicing

Consultation will be undertaken with all relevant service providers in relation to the existing capacity and any augmentation and easement requirements for the development for the provision of utilities.

7.0 Consultation

In preparing the EIS, it is expected that the proponent will undertake consultation with the following stakeholders:

- Liverpool City Council;
- NSW Government Architect (as part of the State Design Review Panel);
- Transport for NSW;
- Sydney Trains; and
- Surrounding landowners and the community.

It is noted that consultation with the Government Architect had begun with the project team meeting on 4 September 2019 to discuss the masterplan of the project, and this proposal will be presented to the State Design Review Panel (first review) scheduled for 23rd October 2019.

8.0 Conclusion

The purpose of this letter is to request the SEARs for the preparation of an EIS for Liverpool Hospital for the development of a new Integrated Services Building and refurbishment of the Clinical Services Building. The proposed development will enable the redevelopment of the western Hospital campus, to support and strengthen the provision of medical services and facilities in the South Western Sydney District.

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 about this matter, please do not hesitate to contact Rachel Mitchell on 0438 220 252.

Yours sincerely



Bruno Zinghini
Executive Director, Western

Attachment A – Concept Architectural Plans