

28 October 2019

Mr Jim Betts  
Secretary  
Department of Planning and Environment  
320 Pitt Street  
Sydney NSW 2001

Dear Mr Betts

**RE: LIVERPOOL HOSPITAL - MULTISTOREY CAR PARK  
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 a multi-storey car park (MSCP) 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.

The proposed MSCP will service the current and future parking demands for the whole Liverpool Hospital campus.

### 1.1 Hospital Infrastructure Works

A range of infrastructure improvement works are occurring across the broader Hospital campus under separate applications 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, including:

- 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.

## 2.0 Site Description

### 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.

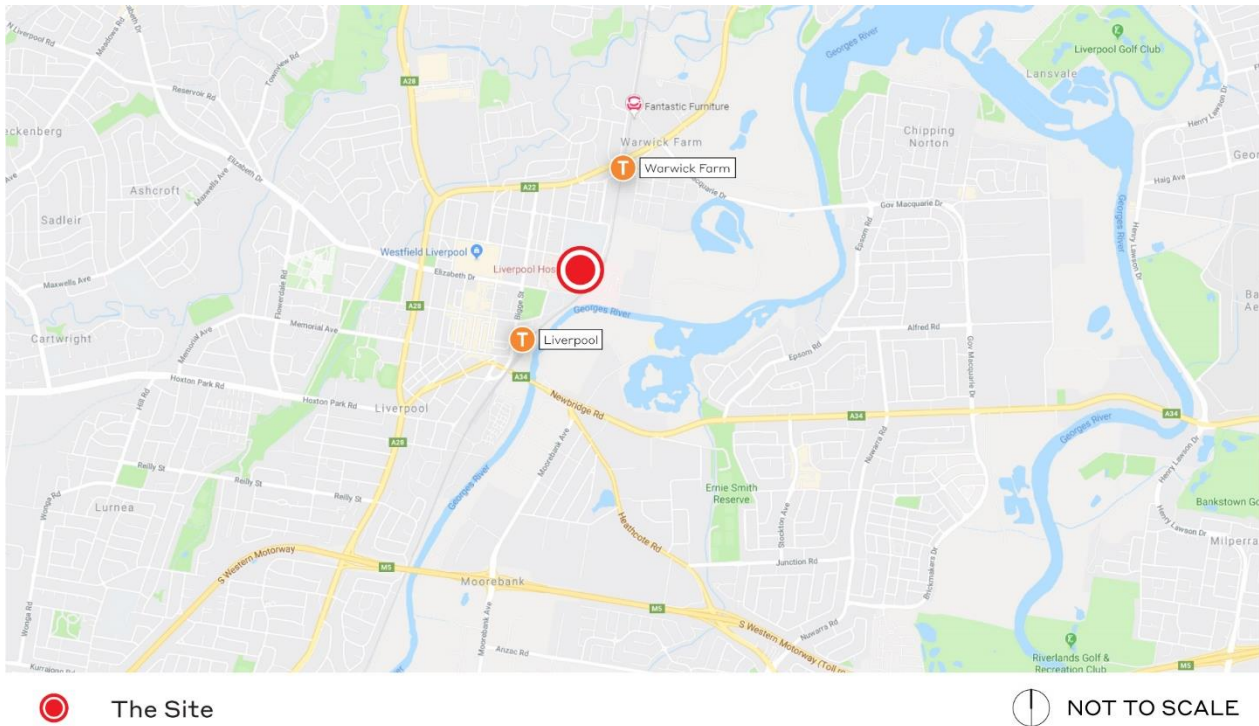


Figure 1 Locational Context  
Source: Google maps / Ethos Urban



Figure 2 Hospital campus aerial  
Source: Nearmap / Ethos Urban

## 2.2 Site Description

The new MSCP is located in the northern portion of the western campus which is currently occupied by an existing 4 storey car park and at-grade parking.

Other structures and vegetation are to be removed as part of broader infrastructure improvement works occurring under separate authorisations via Part 5 of the EP&A Act (see **Section 1.1**).

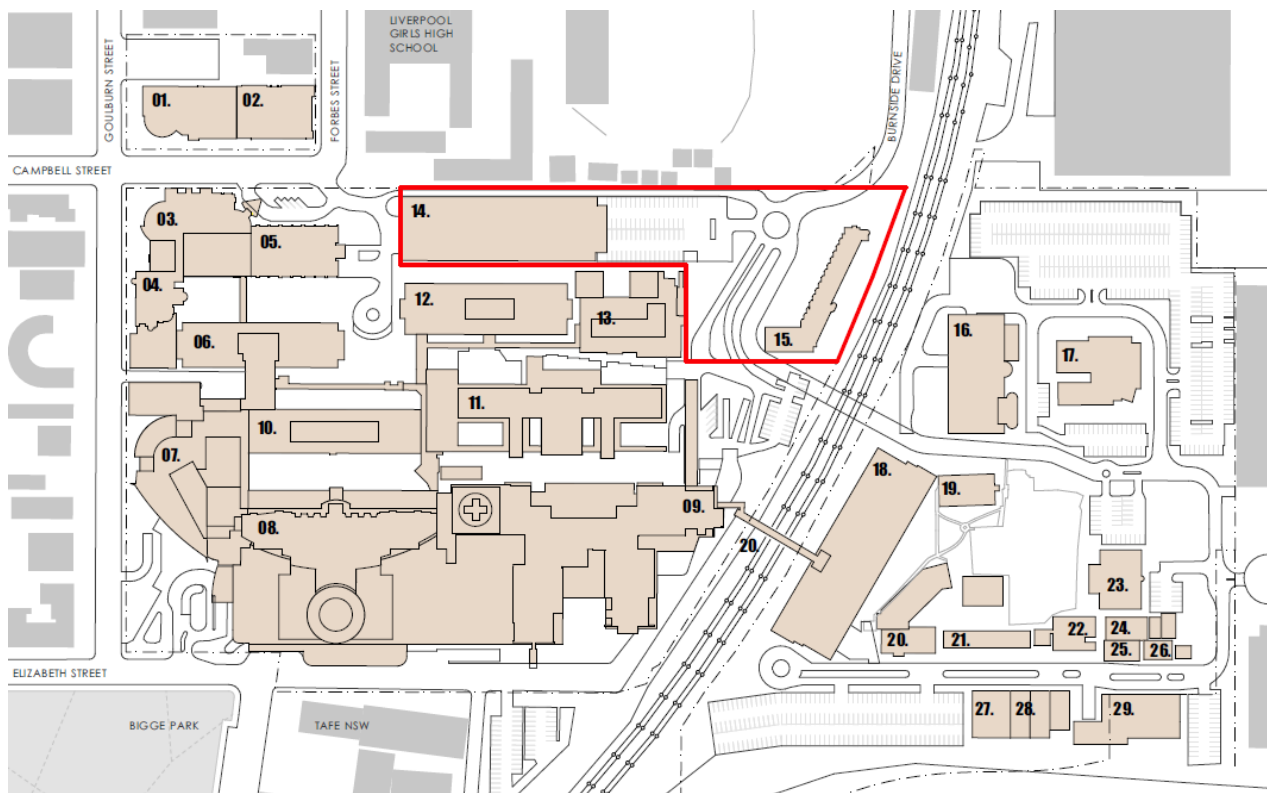
The site is legally described as Lot 501 in DP1165217. The land is owned by NSW Health Administration Corporation.

## 3.0 Description of the proposed development

The SSD will seek consent for:

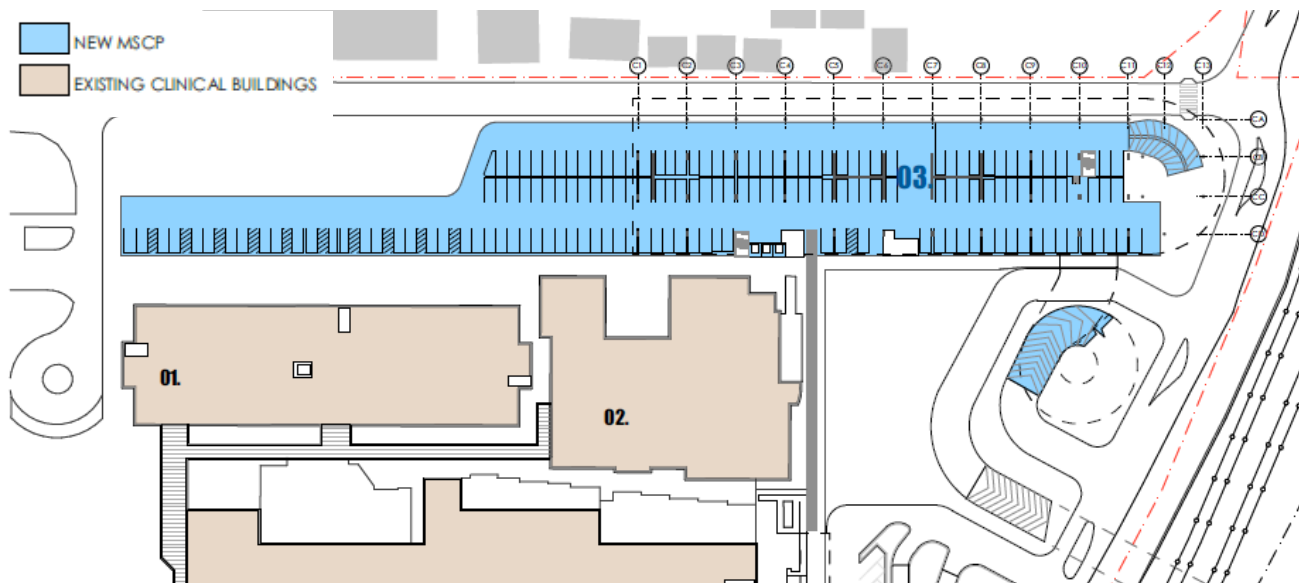
- Demolition and site preparation works;
- Construction of a 6-storey car park including:
  - 1097 car parking spaces;
  - 42 motorcycle parking spaces;
  - Management office; and
  - Accessible restroom.
- Connections to the existing road network;
- Wayfinding and signage; and
- Associated landscaping.

Fitzpatrick and Partners have prepared Concept Architectural Plans included 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**.

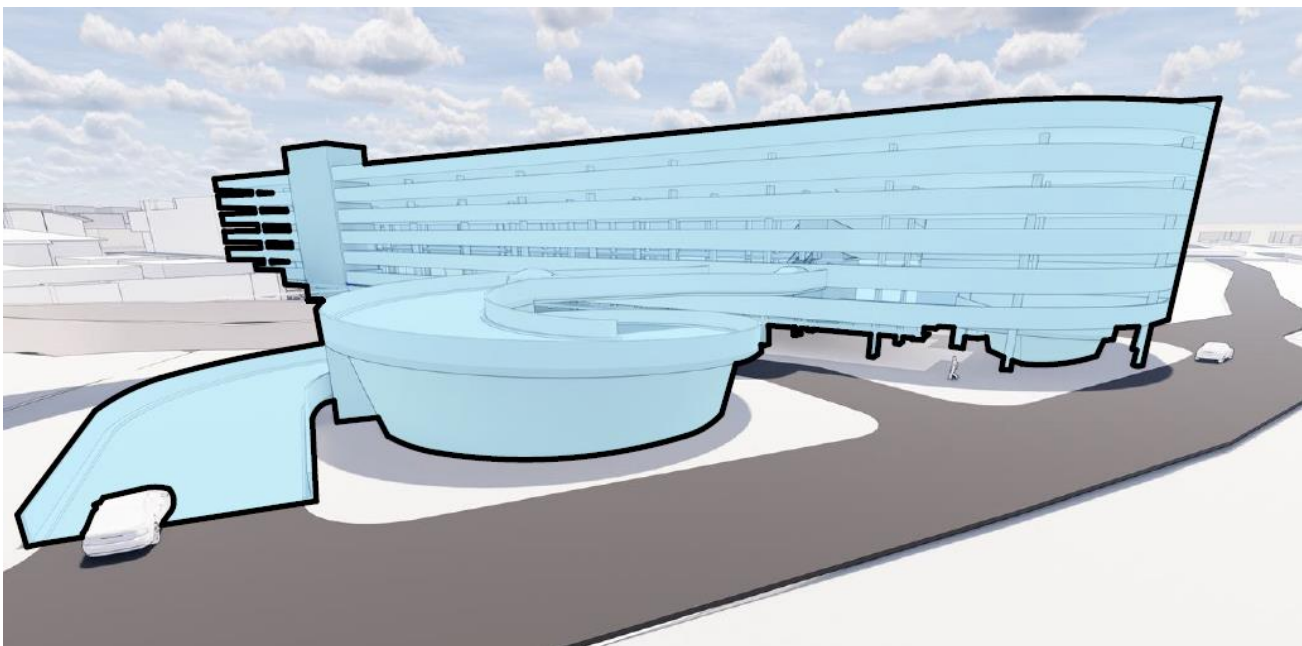




**Figure 3** Site location outlined red  
Source: Fitzpatrick and Partners



**Figure 4** Ground level plan  
Source: Fitzpatrick and Partners



**Figure 5** 3D massing of proposed development - viewed from Burnside Drive  
Source: Fitzpatrick and Partners

### 3.1 Project Value and Job Creation

The estimated projected value is \$50 million.

The project will result in the following job creation:

- 100 construction jobs; and
- Nil full time equivalent roles.

## 4.0 Strategic Need for the Project

### 4.1 Need for the Proposal

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.

As a consequence of the projected growth data, the Hospital is set to expand services in accordance with the NSW Government's health, research and academic precinct. A preliminary analysis of the existing demand and future car parking supply on the site has been undertaken. The analysis found that the existing campus supply of car parking spaces is inadequate to cater for the increase in staff, patients and visitors to Liverpool Hospital.

While the Liverpool Hospital is located in close proximity to a number of public transport options, the 24 hour operation of the Hospital, the need for shift work and the growing population means that it is required to ensure that adequate and affordable onsite car parking is available to staff, patients and visitors.

## 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 MSCP 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>

Strategic Plan	Comment
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 and 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 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).*

The proposal has a CIV in excess of \$30 million and is defined as part of a hospital, it is therefore considered to be an SSD Application.

## 5.4 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. 55 – Remediation of Land* (SEPP 55); and
- *State Environmental Planning Policy (Infrastructure) 2007.*

## 5.5 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.*

Hospitals are defined as:

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

- (a) day surgery, day procedures or health consulting rooms,
- (b) accommodation for nurses or other health care workers,
- (c) accommodation for persons receiving health care or for their visitors,
- (d) shops, kiosks, restaurants or cafes or take away food and drink premises,
- (e) patient transport facilities, including helipads, ambulance facilities and **car parking**,
- (f) educational purposes or any other health-related use,
- (g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),
- (h) chapels,
- (i) hospices,
- (j) mortuaries.

**(emphasis added).**

Under the LEP, development for the purposes shown on the Land Zoning Map (Health Services Facilities) and any development that is ordinarily incidental or ancillary to that purpose, is permissible with consent. Accordingly, the proposed development 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	The subject MSCP works are not located within an area identified as a heritage item or within a heritage conservation area.
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.
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.

### ***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 on the site 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.

### ***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.

### ***Biodiversity***

The *Biodiversity Conservation Act 2016* (BC Act) identifies threatened species, populations and ecological communities in NSW and provides mechanisms for their conservation and recovery.

Section 7.9 of the *Biodiversity Conservation Act 2016* requires that an EIS submitted with an SSD application be accompanied by a *biodiversity development assessment report* unless the *Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values*.

There are several obligations placed on HI in relation to the Proposal. HI must consider threatened species, populations, ecological communities, habitat, key threatening processes, offsets and recovery plans in fulfilling its statutory responsibilities.

### ***Civil Infrastructure***

The works are located adjacent to the Sydney trains rail corridor. The preparation of technical documentation will be undertaken in consultation with Sydney Trains to ensure the design meets relevant requirements.

### ***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.

### ***Environmental Amenity***

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

## 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.

Consultation with the Government Architect has begun with the project team meeting on 4 September 2019 to discuss the project.

## **8.0 Conclusion**

The purpose of this letter is to request the SEARs for the preparation of an EIS for a new MSCP at Liverpool Hospital. The proposed development will improve the existing car parking facilities within the Hospital campus and ensure that future car parking demand is met. The development will support the upgrades to Liverpool Hospital, and will further support and strengthen Liverpool's prominence as the district Hospital in South Western Sydney.

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**