



Request for Secretary's Environmental Assessment Requirements

Proposed State Significant Development - Extension to Wentworthville Northside West Clinic

23-27 Lytton Street, Wentworthville
Lot 1 DP787784

Prepared by Willowtree Planning Pty Ltd on behalf
of Ramsay Health Care

April 2021

Request for Secretary's Environmental Assessment

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Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

TABLE OF CONTENTS

PART A	PRELIMINARY	2
1.1	INTRODUCTION	1
PART B	SITE ANALYSIS	2
2.1	SITE LOCATION AND CHARACTERISTICS	2
2.2	SITE CONTEXT	3
PART C	PROPOSED DEVELOPMENT	4
3.1	AIMS AND OBJECTIVES OF THE PROPOSAL	4
3.2	DESCRIPTION OF PROPOSAL	4
3.3	OPERATIONAL DETAILS	6
3.4	CONSULTATION	7
PART D	STATUTORY PLANNING CONTROLS	9
4.1	ENVIRONMENTAL PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999	9
4.2	ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979	9
4.3	ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2000	10
4.4	PROTECTION OF ENVIRONMENTAL OPERATIONS ACT 1979	10
4.5	BIODIVERSITY CONSERVATION ACT 2016	10
4.6	WATER MANAGEMENT ACT 2000	11
4.7	STATE ENVIRONMENT PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011	12
4.8	STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007	12
4.9	STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND	13
4.10	HOLROYD LOCAL ENVIRONMENTAL PLAN 2013	13
4.11	HOLROYD DEVELOPMENT CONTROL PLAN 2013	19
PART E	ENVIRONMENTAL ASSESSMENT	21
PART F	CONCLUSION	25

APPENDICES

Appendix	Document	Prepared by
1	Architectural Drawings	Team 2 Architects
2	EPBC Protected Matters Report	Department of Agriculture, Water and the Environment
3	Preliminary Cost Report	Erilyan

FIGURES

Figure 1 Aerial Map of Site (Nearmap 2021)	2
Figure 2 Cadastral Map of Site (SIX Maps 2021)	3
Figure 3 Proposed Site Plan (Team 2 Architects 2021)	6
Figure 4 East Elevation View from Lytton Street (Team 2 Architects 2021)	6
Figure 5 Biodiversity Values Map (NSW Government 2021)	11
Figure 6 Land Zoning Map (NSW Legislation, 2020)	14
Figure 7 Height of Buildings Map (NSW Legislation 2021)	17
Figure 8 Floor Space Ratio Map (NSW Legislation 2021)	17
Figure 9 Heritage Map (NSW Legislation 2021)	18
Figure 10 Salinity Map (NSW Legislation 2021)	18

TABLES

Table 1 Development Particulars	4
Table 2 Operational Details	7

Table 3 HLEP2013 Development Standards..... 15

Table 4 HDCP2013 Site Specific Development Objectives & Controls – 23-27 Lytton Street, Wentworthville
..... 19

Table 5 Environmental Risk Assessment 21

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

PART A PRELIMINARY

1.1 INTRODUCTION

This Scoping Report has been prepared by Willowtree Planning on behalf of Ramsay Health Care and is submitted to the NSW Department of Planning, Industry and Environment (DPIE) in support of a formal request for the Secretary's Environmental Assessment Requirements (SEARs).

This request for SEARs is made in relation to the proposed extension of the Wentworthville Northside West Clinic at 23-27 Lytton Street, Wentworthville (Lot 1 DP787784). The proposed extension of the Northside West Clinic will be constructed to the south and west of the existing Clinic which currently comprises car parking and vegetation.

The proposal includes the erection of a three-storey extension to the existing Clinic comprising 95 inpatient units, nine (9) consulting suites and associated car parking and landscaping.

The Site is located within the Cumberland Local Government Area (LGA) and is zoned R4 High Density Residential under the provisions of *Holroyd Local Environmental Plan 2013* (HLEP2013). Development for the purpose of health services facility is permissible with consent within the R4 zone as a prescribed zone pursuant to the *State Environmental Planning Policy (Infrastructure)* (SEPP Infrastructure).

The proposal constitutes State Significant Development (SSD) pursuant to Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). Clause 14 of Schedule 1 relates to *Hospitals, medical centres and health research facilities* and provides that the following is state significant development:

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).*

This Scoping Report provides a brief overview of the proposal and the planning framework that applies to enable the issue of the SEARs, which will guide the preparation of a formal Environmental Impact Statement (EIS) for future development of the land.

It is therefore requested that DPIE issue formal SEARs to support the preparation of the EIS for the proposed SSD.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

PART B SITE ANALYSIS

2.1 SITE LOCATION AND CHARACTERISTICS

The Subject Site is identified as 23-27 Lytton Street, Wentworthville, being legally described as Lot 1 DP787784.

The Site is 6,655m² and irregular in shape. The Site presently contains the existing Wentworthville Northside West Clinic which is operated by Ramsay Health Care. The Clinic adjoins low density residential development to the north, east and south of the site and Lytton Street Park and Finlayson Creek to the west.

The Site benefits from a large single site frontage of approximately 107m to Lytton Street and as such ingress/egress from the site is via Lytton Street.

The Site is situated approximately 2.7km from Parramatta and 23km from Sydney CBD. The Site affords road linkages to Cumberland Highway, Great Western Highway, M4 Western Motorway and Old Windsor Road. The Site is also highly accessible via public transport including bus services on Jordan Street and Veron Street, as well as the Wentworthville Station, which is located approximately 433m north west to the Site.

The Site and surrounding context are best illustrated in **Figure 1** and **2** below.



Figure 1 Aerial Map of Site (Nearmap 2021)

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

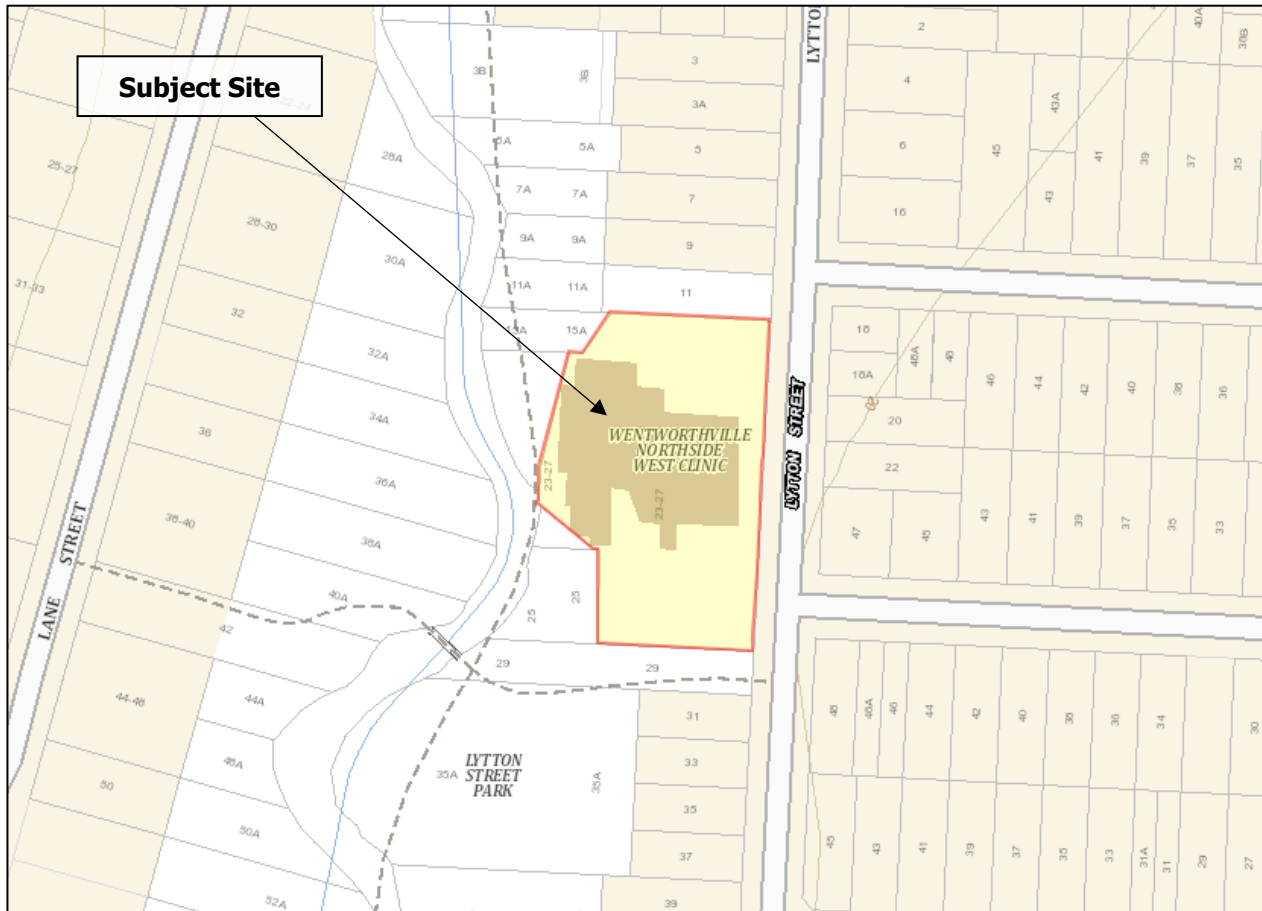


Figure 2 Cadastral Map of Site (SIX Maps 2021)

2.2 SITE CONTEXT

The Site is located in Wentworthville, which forms part of the Cumberland Local Government Area (LGA).

As noted above, the surrounding context exhibits a number of residential and recreation uses, mainly characterised by low density residential housing and Lytton Street Park. It is noted that the Site comprises an existing health care facility known as the Wentworthville Northside West Clinic and has been integrated harmoniously within its context.

Key land uses in the vicinity of the Site include:

- North – R4 High Density Residential zoned land comprising existing low density residential dwellings;
- South – RE1 Public Recreation zoned land and R2 Low Density Residential zoned land comprising existing low density residential development;
- East – R2 Low Density Residential zoned land;
- West – RE1 Public Recreation zoned land comprising Lytton Street Park and Finlaysons Creek.

PART C PROPOSED DEVELOPMENT

3.1 AIMS AND OBJECTIVES OF THE PROPOSAL

The following aims and objectives have been identified as forming the basis of the proposed development of the subject land to accommodate the extension of Wentworthville Northside West Clinic:

- Facilitate the three-storey extension of the existing Clinic to meet the significant demand that exists in the Greater Sydney Region;
- Design the site to create a high-quality hospital for both staff and patients;
- Respond to the current and projected growth of Greater Sydney Region through the provision of hospital beds and consulting suites;
- Ensure minimal environmental impact; and
- Ensure development is compatible with surrounding development.

The Site and proposed concept design are considered to meet the objectives of the project.

3.2 DESCRIPTION OF PROPOSAL

The proposal includes the erection of a three-storey extension (being the 'Stage 2' building) to the existing Wentworthville Northside West Clinic, as well as alterations and additions to the existing 'Stage 1' building on Site. The proposed three-storey extension will be located south and west of the existing building above the existing at-grade carpark. The proposed extension would result in an additional Gross Floor Area (GFA) of 4,559m² with an addition of 58 carparking spaces. Specifically, the proposal entails the following:

- Construction of a three-storey extension of the existing Wentworthville Northside West Clinic located to the south and west of the existing building above the existing at-grade carparking area, comprising:
 - Addition of 95 inpatient rooms and nine consulting suites across Levels 1 to 3
 - Provision of 15 carparking spaces on Ground Level
- Alterations and additions to existing Stage 1 building comprising:
 - A new lobby, gym, loading bay, ancillary office and associated amenities on Lower Ground Level
 - A new lobby, art room and amenities on Ground Level
- Construction of a new car park building located to the west of the existing Stage 1 building with a total of 43 carparking spaces
- Tree removal in the southern portion of the Site

A number of trees in the southern portion of the Site are required to be removed to facilitate the construction of the proposed expansion. The proposal has been designed to optimise the retention of existing trees and vegetation on site, which will be maintained through the implementation of the management measures designed a qualified arborist. An Arboricultural Impact Assessment will be provided as part of the EIS to address the proposed tree removal.

The development particulars of the proposal are illustrated in **Table 1** below.

Table 1 Development Particulars	
Location	Component
Lower Ground Level	▪ Existing Stage 1 building: ○ New lobby, loading bay, gym, ancillary office and associated amenities ▪ New carpark building: ○ 25 carparking spaces
Ground Level	▪ Existing Stage 1 building:

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

	○ Internal alterations and additions to create new group rooms, expanded ECT recovery room, staff room, café, breakout room and toilets ▪ Proposed Stage 2 building: ○ Carparking area with 15 carparking spaces, storage and services ▪ New carpark building: ○ 18 carparking spaces
Level 1	▪ Proposed Stage 2 building: ○ 41 inpatient units ○ 9 consulting suites ○ External courtyard ○ Associated amenities including lounge rooms, dining area, terrace, kitchenette and utility rooms
Level 2	▪ Proposed Stage 2 building: ○ 30 inpatient units ○ Courtyard ○ Associated amenities including lounge rooms, servery and utility rooms
Level 3	▪ Proposed Stage 2 building: ○ 24 inpatient units ○ Outdoor courtyard ○ Associated amenities including lounge rooms and utility rooms

A set of Concept Architectural Plans has been prepared by Team 2 Architects and are included in **Appendix 1**. The Architectural Plans provided are conceptual at this stage and therefore will be subject to future amendments.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

Further to this, **Figure 3** below illustrates the proposed location of the extension to the south and west of the existing Wentworthville Northside West Clinic. The East Elevation of the proposed extension is also illustrated in **Figure 4**.

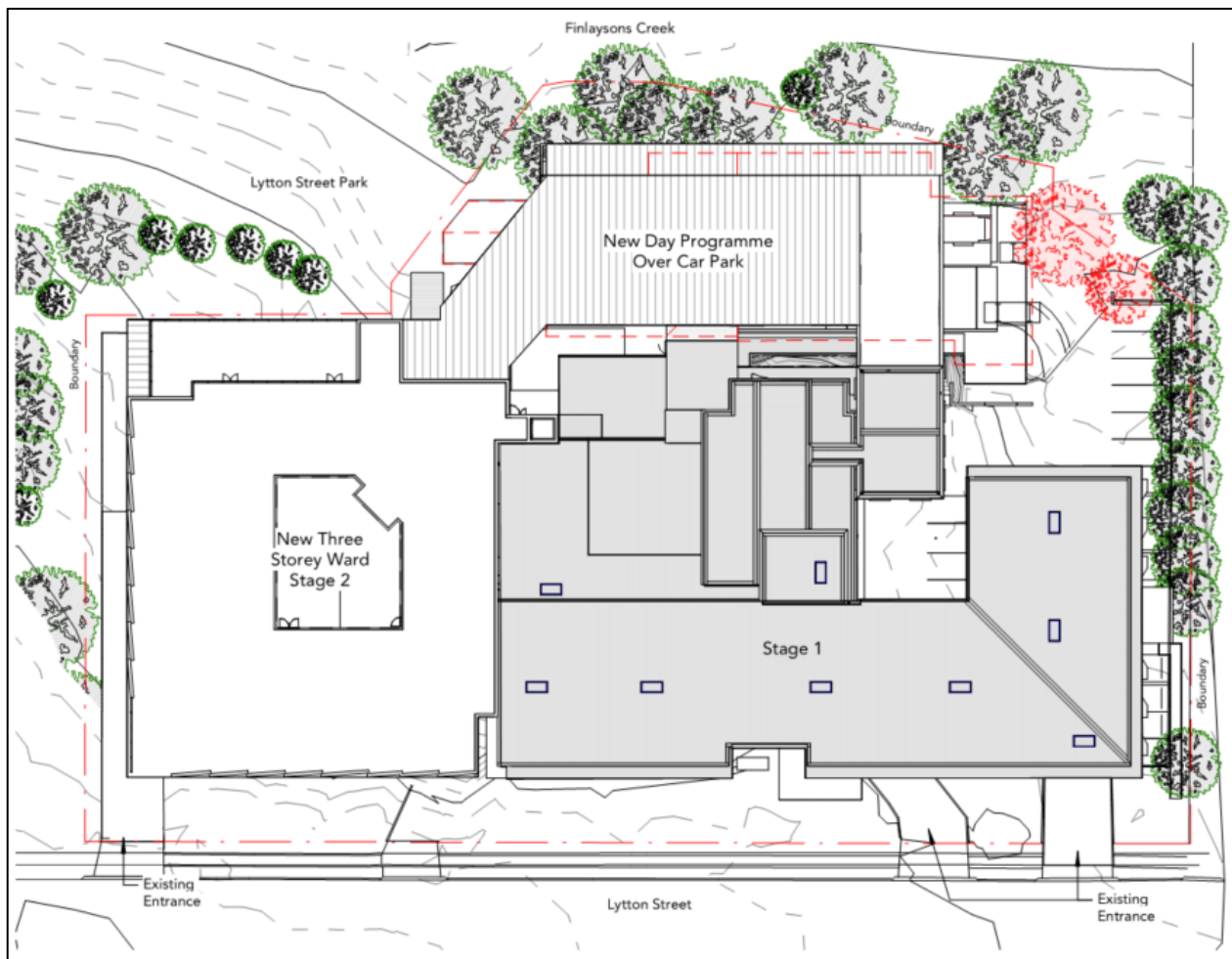


Figure 3 Proposed Site Plan (Team 2 Architects 2021)

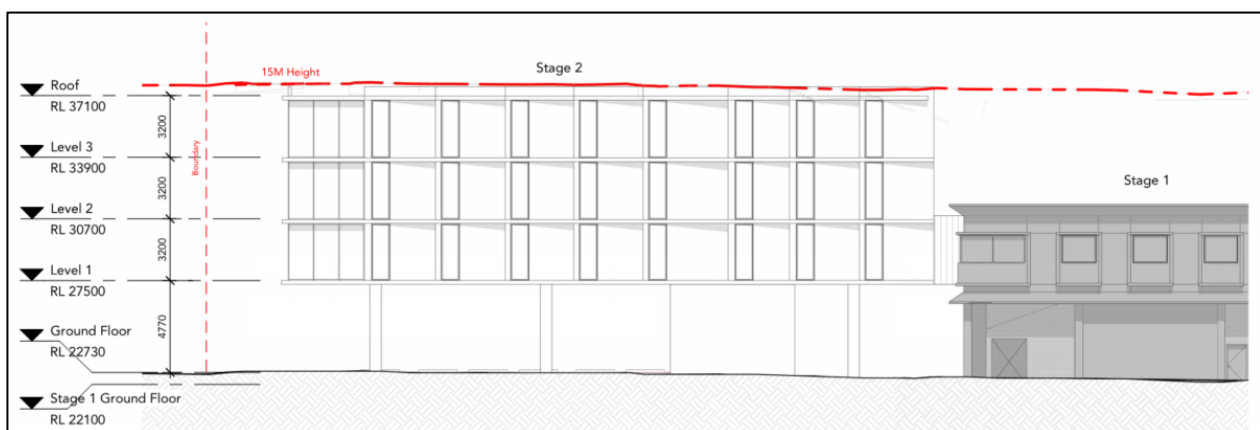


Figure 4 East Elevation View from Lytton Street (Team 2 Architects 2021)

3.3 OPERATIONAL DETAILS

The Wentworthville Northside West Clinic is a member of the Northside Group, owned by Ramsay Health Care and has been operating as an exceptional mental health clinic in Sydney. Currently, the Clinic operates as a private hospital and is a premier provider of mental health care services, which offers high standards evidence-based specialist clinical care for:

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

- Mood disorders
- Eating disorders
- Acute mental Health disorders
- Drug and alcohol detoxification and rehabilitation

The proposed expansion of the Clinic will provide additional operational capacity for the health care facility to provide for mental health services and in-patient residential services in response to the emerging demand for specialist clinical care in the community.

Details of the proposed private hospital's operations (for the ultimate development scenario) are summarised in **Table 2**.

Table 2 Operational Details	
Component	Proposed
Number of jobs (operational)	Additional 23 Full-Time Employees (FTEs)
Number of jobs (construction)	60 construction personnel at height of construction works
Number of Patients	Additional 95 inpatient rooms
Hours of Operation	▪ Ward 24/7 ▪ Day Surgery 7.00am to 7.00pm
Capital Investment Value (CIV)	\$41,649,549.00 AUD

3.4 NEED FOR THE PROPOSED DEVELOPMENT

The proposed development is essential in ensuring that the attributing characteristics of the Subject Site are utilised accordingly throughout the proposed development, by providing a beneficial health care facility to the immediate area, as well as being accessible to the wider locality. Furthermore, the proposed expansion of the Wentworthville Northside West Clinic would enhance the operational capacity of the Clinic to provide high standards specialised health care services.

The proposal will facilitate the effective delivery of health infrastructure by providing excellent mental health care services and inpatient residential care which respond to the changing needs of the community, including mental and psychiatric illnesses and needs for rehabilitation services. Its location in proximity to the Wentworthville local centre would also enhance the accessibility for patients, visitors and workers to various health care facilities. Additionally, the proposal would also facilitate the co-location of health and social infrastructure which would deliver substantial public benefits and support the growth of Wentworthville as a local centre.

In addition, the proposal would build on the health services and infrastructure currently provided by the Clinic to facilitate the orderly and economic use and development of the Site without resulting in any unacceptable economic, environmental or social impacts.

A more detailed justification of the need of the proposed development would be further provided in the subsequent EIS pursuant to the issuance of the SEARs.

In summary, the proposed development would be consistent and commensurate with Commonwealth, State, Regional and Local planning controls and objectives; the environmental characteristics of the Site; the surrounding context; and the principles of Ecologically Sustainable Development (ESD).

3.5 CONSULTATION

Consultation is currently being undertaken with relevant stakeholders. A meeting was held with Cumberland City Council on 7 April 2021 to obtain preliminary feedback on the proposal. Some of the key matters discussed:

- Proposed height and scale; and
- Stormwater design.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

Furthermore, additional consultation with relevant stakeholders will be undertaken during the preparation of the EIS as stipulated by the Major Project Community Consultation Guidelines and the issued SEARs.

PART D LEGISLATIVE AND POLICY FRAMEWORK

The relevant statutory planning policies that apply to the proposed development are as follows:

Commonwealth Planning Context

- *Environmental Protection and Biodiversity Conservation Act 1999*

State and Regional Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning Assessment Regulation 2000*
- *Protection of Environmental Operations Act 1979*
- *Biodiversity Conservation Act 2016 and Biodiversity Conservation Regulation 2017*
- *Water Management Act 2000*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No 55 – Remediation of Land*

Local Planning Context

- *Holroyd Local Environmental Plan 2013*
- *Holroyd Development Control Plan 2013*

4.1 ENVIRONMENTAL PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the Australian Government's central piece of environmental legislation. It provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places, defined in the EPBC Act as matters of National Environmental Significance.

Under the EPBC Act, a person must not, without an approval under the Act, take an action that has or will have, or is likely to have, a significant impact on a matter of National Environmental Significance. These matters are listed as:

- The world heritage values of a declared World Heritage property
- The ecological character of a declared Ramsar wetland
- A threatened species or endangered community listed under the Act
- A migratory species listed under the Act
- The environment in a Commonwealth marine area or on Commonwealth land

The EPBC Protected Matters report generated for the site lists the following EPBC matters within 5km of the Site:

- 2 World Heritage Properties;
- 2 National Heritage Places;
- 7 Threatened Ecological Communities;
- 67 Threatened Species; and
- 39 Migratory Species.

The EPBC Protected Matters Report is provided at **Appendix 2**.

4.2 ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing document for all development in NSW. Pursuant to Section 4.36(2), the EP&A Act provides that:

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

The proposed development has been identified as State Significant Development under SRD SEPP as outlined in **Section 4.7** below.

Pursuant to Section 4.12(8), *a development application for State significant development or designated development is to be accompanied by an environmental impact statement prepared by or on behalf of the applicant in the form prescribed by the regulations.* Accordingly, this application precedes the required EIS.

4.3 ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2000

The *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) prescribes requirements for Environmental Impact Statements in Schedule 2.

Pursuant to Clause 3 of Schedule 2, prior to an EIS being prepared a written application must be made to obtain the Secretary's Environmental Assessment Requirements (SEARs). This application forms the required request for SEARs.

4.4 PROTECTION OF ENVIRONMENTAL OPERATIONS ACT 1979

Schedule 1 of the *Protection of the Environment Operations Act 1979* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).

The proposal will not involve any activity that would require the issue of an Environmental Protection Licence.

4.5 BIODIVERSITY CONSERVATION ACT 2016 AND BIODIVERSITY CONSERVATION REGULATION 2017

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) seeks to *maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.*

Part 7 of the BC Act sets out requirements for biodiversity assessments and approvals under the Planning Act (meaning the EP&A Act).

Pursuant to Section 7.2(1), *development or an activity is likely to significantly affect threatened species if:*

- (a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or*
- (b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or*
- (c) it is carried out in a declared area of outstanding biodiversity value.*

Under Clause 7.1 of the BC Regulation, where the future development involves clearing of native vegetation of 1 ha or more; or the clearing of native vegetation of land with outstanding biodiversity values, the proposed development will exceed the biodiversity offset scheme and will require the preparation of a Biodiversity Development Assessment Report (BDAR).

Upon review of the Biodiversity Values Map (**Figure 5**), the Site is not identified to contain any biodiversity values.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

It is considered that the development would not compromise the integrity of the ecological and biodiversity value of the site.



Figure 5 Biodiversity Values Map (NSW Government 2021)

4.6 WATER MANAGEMENT ACT 2000

The Site does not comprise a watercourse within its boundary. The closest watercourse to the site is Finlayson Creek to the west of the site. The creek is located approximately 5m from the Site at its closest point.

Pursuant to Section 91(2) of the *Water Management Act 2000* (WM Act), a *controlled activity approval* confers a right on its holder to carry out a specified controlled activity at a specified location in, on or under waterfront land.

For the purposes of the WM Act, *waterfront land* includes land 40m inland of the highest bank of a river (inclusive of any tributary of a watercourse). A *controlled activity* means:

- (a) the erection of a building or the carrying out of a work (within the meaning of the *Environmental Planning and Assessment Act 1979*), or
- (b) the removal of material (whether or not extractive material) or vegetation from land, whether by way of excavation or otherwise, or
- (c) the deposition of material (whether or not extractive material) on land, whether by way of landfill operations or otherwise, or
- (d) the carrying out of any other activity that affects the quantity or flow of water in a water source.

Whilst proposed works would be within 40m of a watercourse, Clause 28 of Schedule 4 'Exemptions' of the Water Management Regulations allows for exemptions for a controlled activity where the watercourse is fully lined with concrete. As such, it is considered that a controlled activity approval is not required in this instance.

4.7 STATE ENVIRONMENT PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Proposed developments involving activities that are listed in Schedule 1 of the SRD SEPP are identified as being State Significant Development (SSD). Schedule 1, Clause 14 of the SRD SEPP includes provisions for developments comprising hospitals, medical centres and health research facilities to be undertaken as SSD.

Clause 14 of Schedule 1 states:

14 Hospitals, medical centres and health research facilities

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).*

In accordance with Schedule 1 Clause 14(a), given that the CIV of the project is in excess of \$30 million, the proposed development for the purpose of a hospital constitutes SSD.

4.8 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

SEPP Infrastructure applies to the Subject Site and the proposed development.

Part 3 Division 10 Clause 57(1) of SEPP Infrastructure states that “*development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone*”. Pursuant to the *Standard Instrument – Principal Local Environmental Plan*, a ‘health services facility’ is defined as follows:

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.***

A ‘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,*

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

- (i) *hospices,*
- (j) *mortuaries.*

The proposed alterations and additions to the existing Wentworthville Northside West Clinic is consistent with the above definition. Given that the Site is located within the R4 High Density Residential zone which is a prescribed zone pursuant to Clause 56, the proposed development for the purpose of a health services facility is thereby permissible with consent.

SEPP Infrastructure also provides for certain proposals, known as Traffic Generating Development, to be referred to NSW Roads and Maritime Services (RMS) for concurrence.

The referral thresholds for 'hospitals' development are as follows:

- *200 or more beds (site with access to a road (generally))*
- *100 or more beds site 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)*

The proposed development seeks consent for 91 rooms which would result in a total of 125 rooms in the hospital. As such, referral to the RMS is not required pursuant to SEPP Infrastructure.

4.9 STATE ENVIRONMENTAL PLANNING POLICY NO 55 – REMEDIATION OF LAND

State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55) provides a state-wide planning approach for the remediation of land and aims to promote the remediation of contaminated land to reduce the risk of harm.

Clause 7(1) of SEPP 55 requires the consent authority to consider whether land is contaminated prior to consent of a development.

According to the Environmental Protection Authority (EPA) website, the Site is not identified as a notified contaminated site.

The Section 10.7 (2) and (5) Planning Certificate does not identify the land as contaminated. Notwithstanding, given the extent of excavation required the future EIS will be supported by Geotechnical Study and Preliminary Site Investigations.

4.10 HOLROYD LOCAL ENVIRONMENTAL PLAN 2013

HLEP2013 is the primary Environmental Planning Instrument (EPI) applicable to the Site. The relevant provisions are summarised below and in **Table 3**.

Zoning and Permissibility

The Site is located within the R4 High Density Residential zone pursuant to HLEP2013 which is illustrated in **Figure 6** below.

The objectives of the R4 Zone are:

- *To provide for the housing needs of the community within a high density residential environment.*
- *To provide a variety of housing types within a high density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

The Site has been established for a health services facility which provides health care services to meet the day to day needs of residents. The proposed extension of the Wentworthville Northside West Clinic would increase the operational capacity of the existing health care facility and would continue to provide health services facilities for not only the local community but the wider Cumberland LGA. As such, it is considered that the proposed development is align with the objectives of the zone.

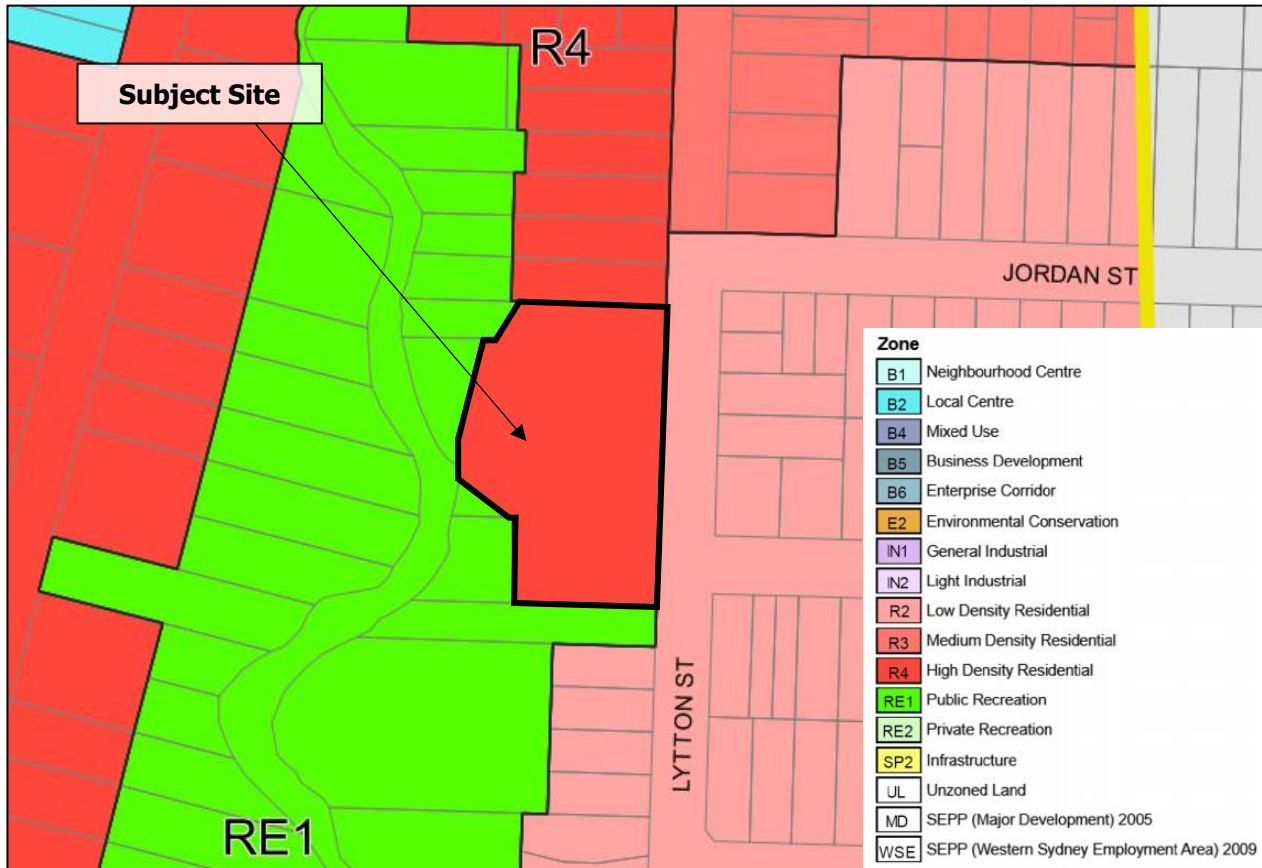


Figure 6 Land Zoning Map (NSW Legislation, 2020)

Within the R4 zone the following land uses are permitted *without* consent:

Home occupations

Within the R4 zone the following land uses are permitted *with* consent:

Attached dwellings; Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Environmental protection works; Exhibition homes; Home businesses; Home industries; Hostels; Kiosks; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Recreation areas; Residential flat buildings; Respite day care centres; Roads; Seniors housing; Shop top housing

Within the R4 zone the following land uses are prohibited:

*Pond-based aquaculture; Tank-based aquaculture; **Any other development not specified in item 2 or 3***

Pursuant to HLEP2013, the development of a 'health services facility' is prohibited within the R4 zone. Notwithstanding, as demonstrated in **Section 4.8**, given that the Site is located within the R4 zone as a prescribed zone, permissibility of the proposed development for the purpose of a health services facility is established under SEPP Infrastructure. Accordingly, the proposal is permissible with consent pursuant to SEPP Infrastructure being for a health services facility on land zoned R4 High Density Residential.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

The relevant HLEP2013 have been set out in **Table 3** below.

Table 3 HLEP2013 Development Standards	
Clause	Comment
Clause 4.1 – Minimum lot size	The Site is subject to a minimum lot size of 450m ² pursuant to the HLEP2013. The proposed development does not seek to subdivide the Site.
Clause 4.3 – Height of buildings	The Site is subject to a maximum building height of 15m pursuant to HLEP2013 (Figure 7). The proposal exhibits a building height of 15.6m to 17.8m. It is noted that the proposal involves a height exceedance ranging from 0.6m to 2.8m, which is equivalent to a building height variation of 18.7%. Importantly, the height of the proposed building is largely compliant with the 15m height limit when viewed from Lytton Street, which is consistent with the streetscape character of locality. Notwithstanding, the proposed building height is consistent with the objectives of Clause 4.3. Particularly, the proposal is not anticipated to impact on the visual privacy of the neighbouring residential properties given that adequate separation has been provided from the existing residential dwellings to the south. The proposed Stage 2 building has also been designed to preserve solar access for the surrounding residential properties. Further, the proposed Stage 2 building has been designed to respect the topography and natural landform of the Site. It is noted that the proposal does not include any underground structure or basement level, which will only involve minor extent of earthworks or excavation required for the construction and therefore minimise the potential risks of the disrupting the drainage patterns and soil stability of the Site. The proposal will also present an appropriate scale and intensity with respect to the proposed building height. While the proposal involves a variation to the floor space ratio (FSR) control (refer to section below), the proposal has been designed to respond to the demand for health care services in the locality and is considered to be of appropriate scale and density in its location. Additionally, the proposal has been articulated to be conducive to the surrounding residential dwellings and sympathetic to the surrounding built form. Therefore, the proposal is not anticipated to result in any adverse visual or amenity impacts. Given the variation to the building height limit under Clause 4.3, a Clause 4.6 Variation Request will be submitted as part of the future EIS.
Clause 4.4 – Floor space ratio	The Site is subject to a 1:1 maximum FSR pursuant to HLEP2013 (Figure 8). The existing FSR as set out by M2014/195/2 is 0.62:1 (4,126m²). The additional GFA of 4,559m² would result in an overall GFA of 7,332m² which results in a FSR of 1.102:1 which exhibits a 10.2% variation to the FSR control under Clause 4.4. The proposed FSR is consistent with the objectives of Clause 4.4. Specifically, the proposed extension of a health services facility will support the viability of Wentworthville as a local centre by providing health care infrastructure in the locality and provide employment opportunities in the vicinity of the Wentworthville local centre.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

	The proposed development will also complement the emerging residential population by increasing the operational capacity of the existing Wentworthville Northside West Clinic. The proposed expansion is compatible with the existing and desired future character of the Wentworthville locality as a principal local centre and is also sympathetic to the established residential character in the locality. The proposal will not result in any adverse amenity impacts on the Wentworthville residential area and has been designed to facilitate vehicle and pedestrian access for the development. Adequate carparking will also be provided for the proposal. Given the variation to the FSR control under Clause 4.4, a Clause 4.6 Variation Request will be submitted as part of the future EIS.
Clause 4.6 – Exceptions to development standards	As demonstrated above, the proposal involves variations to the development standards under Clause 4.3 Height of buildings and Clause 4.4 Floor space ratio of HLEP2013. A Clause 4.6 Variation will be provided to accompany the future EIS.
Clause 5.1 – Relevant acquisition authority	The site is not identified as land reserved for acquisition pursuant to HLEP2013.
Clause 5.10 – Heritage	The site is not identified as a heritage item nor is it located within a heritage conservation area (Figure 9). The closest heritage item is 42 Lane Street, Wentworthville which is local heritage item I135 and is known as Federation cottage. This item is located approximately 71m away at its closest point.
Clause 6.2 – Earthworks	Earthworks will be addressed as part of any future SSDA to ensure that proposed development would not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.
Clause 6.3 – Essential services	Adequate arrangements for the augmentation of essential services will be made to facilitate the proposed development.
Clause 6.4 – Flood planning	The Site is identified as a flood affected lot and any future SSDA would be required to prepare a Flood Assessment Report.
Clause 6.8 – Salinity	The Site is identified as an area of moderate salinity potential pursuant to HLEP2013 (Figure 10). As such, this would be required to be addressed as part of any future SSDA.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

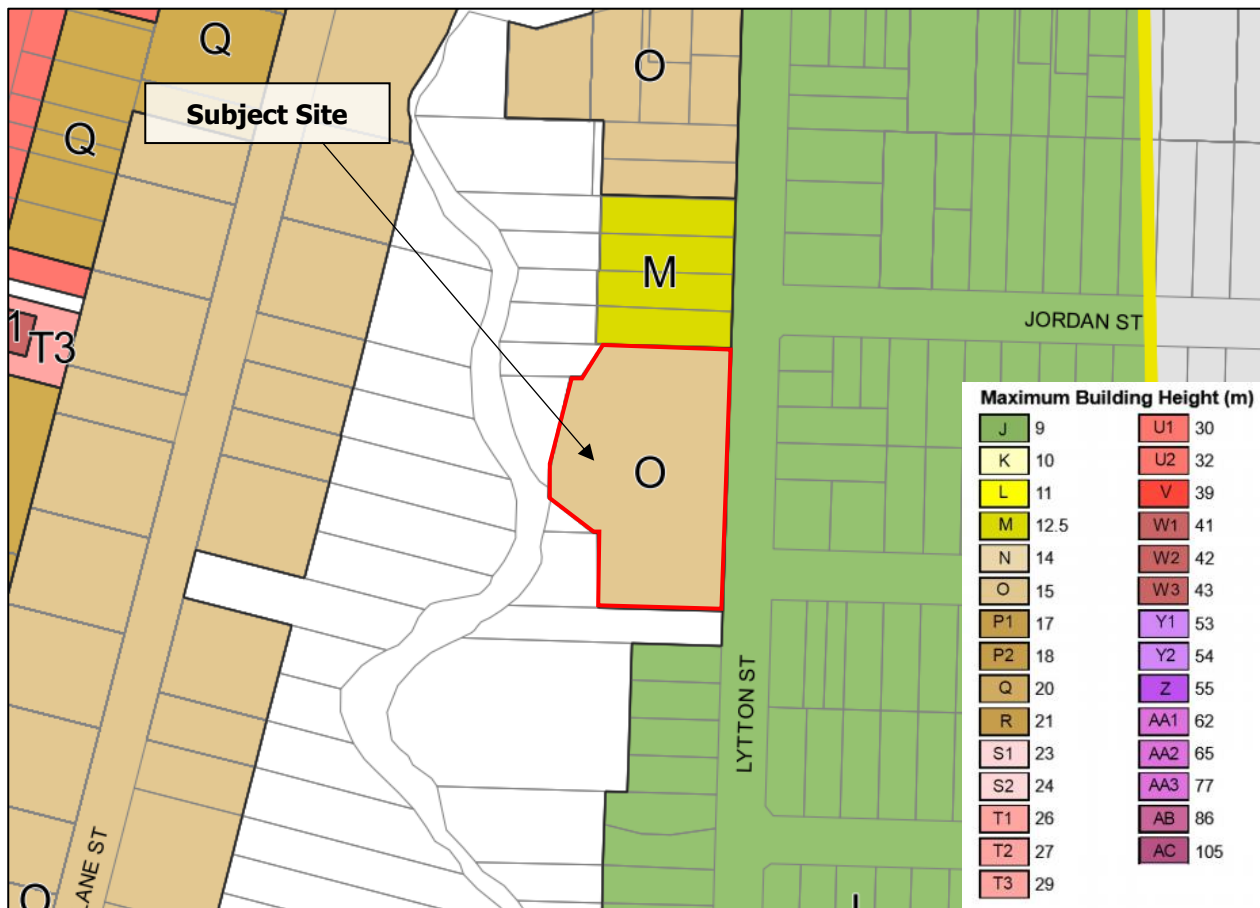


Figure 7 Height of Buildings Map (NSW Legislation 2021)

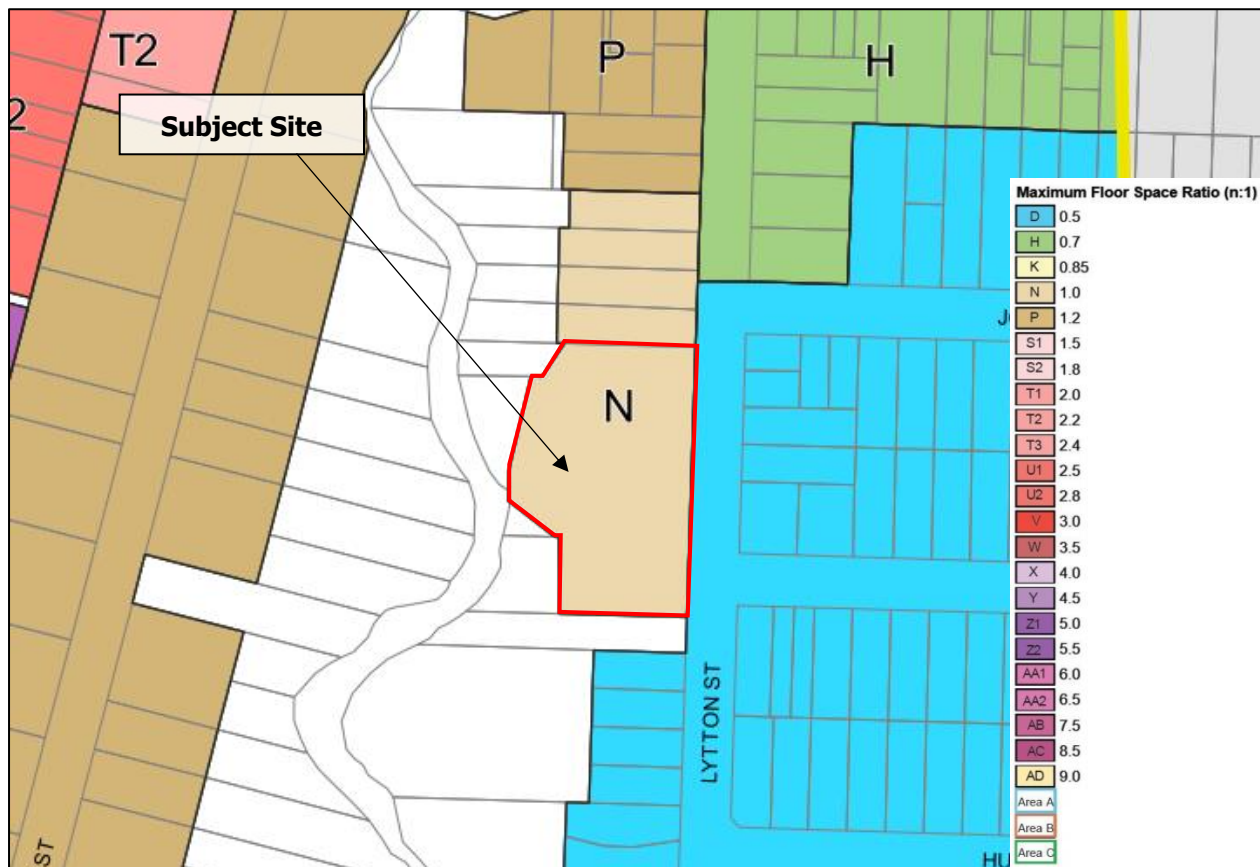


Figure 8 Floor Space Ratio Map (NSW Legislation 2021)

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

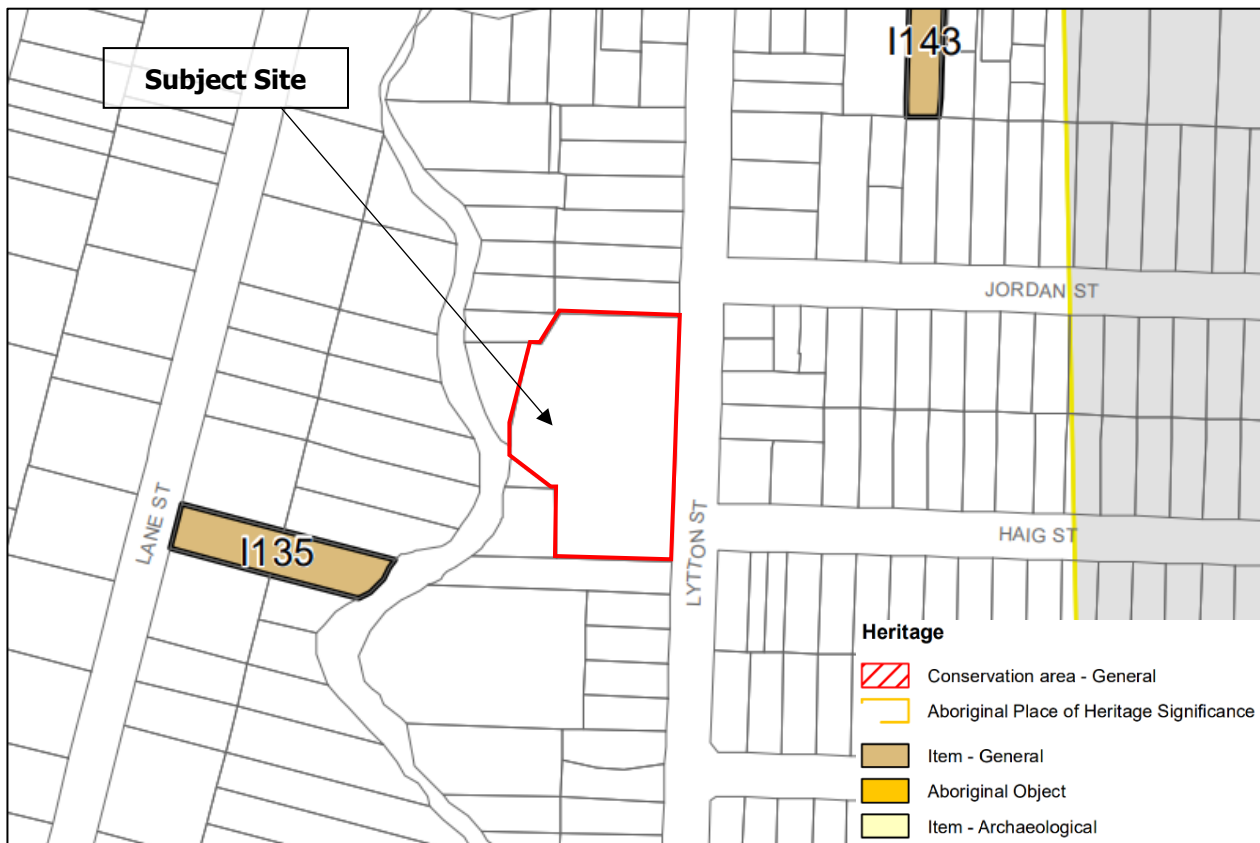


Figure 9 Heritage Map (NSW Legislation 2021)

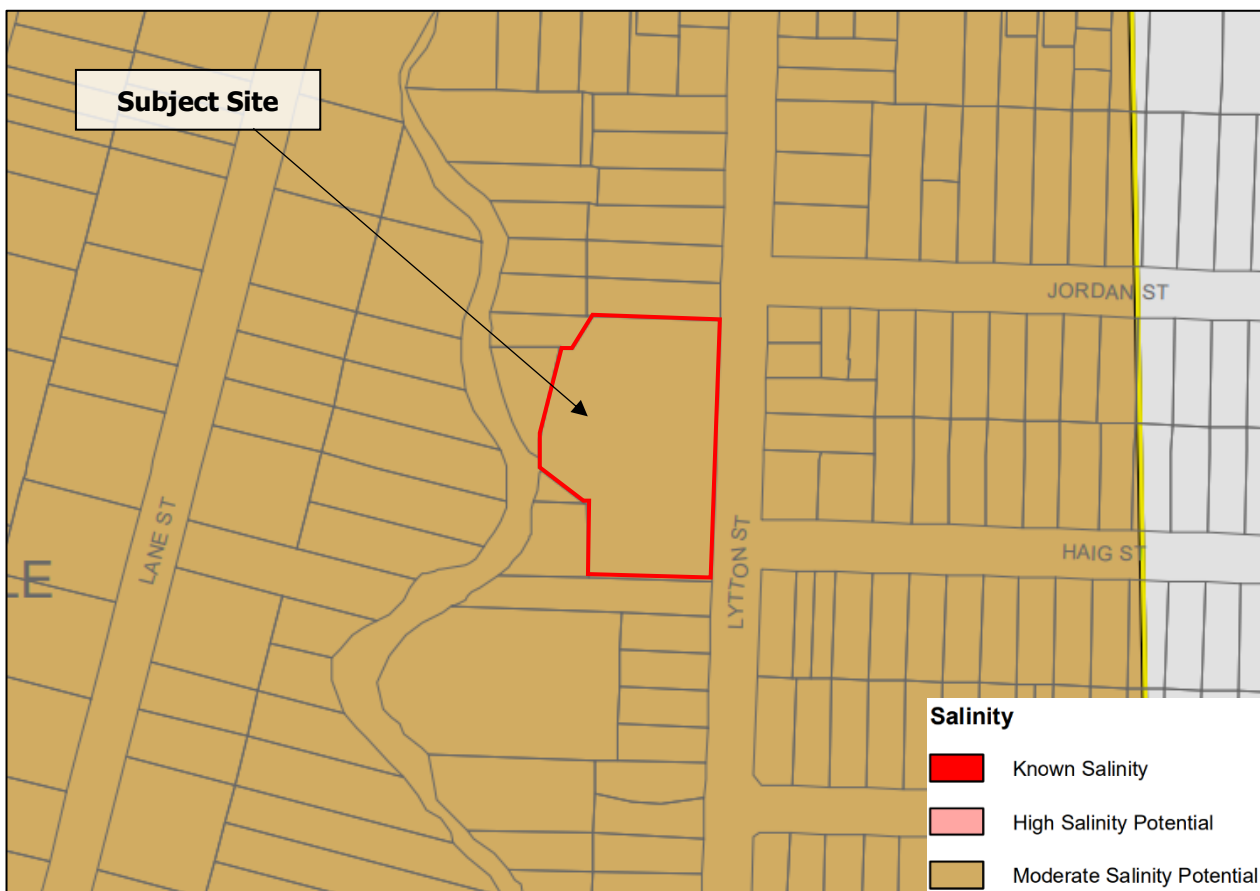


Figure 10 Salinity Map (NSW Legislation 2021)

4.11 HOLROYD DEVELOPMENT CONTROL PLAN 2013

Clause 11 of the SRD SEPP provides that:

Development control plans (whether made before or after the commencement of this Policy) do not apply to:

(a) State significant development

Therefore, the Holroyd Development Control Plan 2013 (HDCP2013) does not apply to the proposed extension to the existing Clinic.

Notwithstanding the above, a preliminary assessment against the site-specific controls contained within the HDCP2013 has been provided in **Table 4** below.

Table 4 HDCP2013 Site Specific Development Objectives & Controls – 23-27 Lytton Street, Wentworthville	
Objective	Comment
<i>O1. To ensure that any future development on the site provides adequate separation to adjacent properties the low density development is consistent with that allowed under the R2 zone of Holroyd LEP 2013.</i>	The proposed development would provide adequate separation between the Clinic and the low density residential receptors nearby. Additionally, the three-storey nature of the building allows it to continue to harmoniously integrate into the surrounding environment.
<i>O2. To protect the amenity of nearby properties and the use of those properties</i>	The proposed development would protect the amenity of the nearby properties and the use of the residential properties and the Lytton Street Park to the rear.
Control	Comment
Setbacks	
<i>C1. Any new building on the property is to adhere to the following setbacks from the identified property boundary:</i>	The proposed development seeks a significantly reduced setback to the rear of the property to provide the new extension. It is not considered that this reduced setback would not have a detrimental impact on Lytton Street Park and would not result in a loss of functionality of the Park.
▪ <i>Minimum of 6m setback from the front (street facing) property boundary. This setback distance may be reduced in order to align the new building with an existing building on the property.</i> ▪ <i>Minimum of 6m setback from the rear property boundary.</i> ▪ <i>Minimum of 3m setback from the side property boundary.</i> ▪ <i>Minimum of 3m setback from the side and from the rear property boundaries to be applied to basement levels.</i>	Particularly, the proposed development will not impact on the continued use of Lytton Street Park for the purpose of public open space and recreational use. The proposal will preserve the existing natural environment of Lytton Street Park and Finlaysons Creek for recreational use. The Lytton Street frontage of the proposed extension has been articulated to complement the building articulation of the existing Stage 1 building. The proposed setback from Lytton Street is also generally consistent with the current setback from the eastern boundary. The proposal has been designed to be conducive to the neighbouring residential properties whilst also optimising the functionality and viability of the site as a health services facility. Hence, the proposed setbacks are deemed appropriate.
Side and Rear Setbacks	High quality landscaping would be provided within the setback areas where possible to provide for a positive

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

<i>C2. The land within the rear and side setback areas is to be used for landscaping (vegetation planting). This landscaping is to provide a level of privacy from, and to provide a visual interruption to, the building when viewed from either the adjacent open space areas or the residential properties to the north and south.</i>	amenity outcome. A Landscape Plan will be prepared to accompany the future SSDA.
<i>Landscaping</i> <i>C3. A minimum of 25% of the site area is to be landscaped.</i>	High quality landscaping would be provided within the setbacks where possible to provide for a positive amenity outcome. A Landscape Plan would accompany the future SSDA.

Further to the above, the proposed development is considered to comply with a merit-based assessment of HDCP2013.

PART E ENVIRONMENTAL ASSESSMENT

A screening analysis of the environmental issues applicable to the proposal is presented in the table below. The risk-based analysis has been used to identify the key environmental issues for further assessment and assist the preparation of the SEARs for the proposed development.

The analysis is based on preliminary environmental assessment of the Site only. The EIS for the proposal will fully address these items and other environmental issues relevant to the proposal.

Table 5 Environmental Risk Assessment	
Issue	Analysis
Site layout, design and visual amenity	▪ The Site layout and design respond to the Site constraints, thus providing a highly functional development which enhances the visual amenity of the locality. ▪ The proposal presents a well-resolved built form, which is complementary to the residential character of the Wentworthville locality. The proposed built form also portrays a quality contribution to the streetscape of Lytton Street, comprising a purpose-built health services facility. ▪ The three-storey nature of the building allows the health services facility to continue to harmoniously integrate into the surrounding environment. While the proposal involves a 18.7% height variation, the design approach for the proposed health services facility gives due consideration to the Site and its contextual relationships. Specifically, the proposed building envelope has been carefully developed to create a well-articulated built form, whilst being conducive to the residential environment in the Wentworthville locality. ▪ Further, the height of the building is largely within the 15m height plane when viewed from Lytton Street by strategically locating the maximum height exceedance in the rear portion of the building facing Lytton Street Park, for which it is visually screened by the built form in the front portion of the building. The proposed building height is therefore compatible with the streetscape character of the Lytton Street. ▪ The proposal also involves a 10.2% variation to the FSR control. Notwithstanding, the proposal presents an appropriate bulk and scale with well-resolved building articulation. Additionally, the proposal has been designed to increase the capacity of the existing Wentworthville Northside West Clinic in order to facilitate the operational requirements of the health services facility, as well as respond to the emerging demand for health infrastructure in the Cumberland LGA. ▪ The building envelope of the proposal has taken into account the transitional relationships with the surrounding residential development by an appropriately scaled built form whilst being considerate to the visual amenity of the neighbouring residential properties. The proposal is not considered to result in any significant visual impacts. Rather, the proposal will present a high quality built form with significant public benefits.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

	▪ The site layout and design responds to the site's constraints and would aim to protect and enhance constrained areas where possible. ▪ Landscaping will aim to soften the appearance of the built form, enhance the vegetated character of the site. ▪ The built form would be designed to incorporate architectural elements that articulate the facades and provide sufficient level of visual amenity within the public domain.
Soil and water	▪ During construction, an Erosion and Sediment Control Plan would be implemented to protect downstream system and receiving waters from sediment-laden runoff. ▪ Rainwater harvesting would also be applied across the Site (where considered practical), which will incorporate non-potable reuse and recycled potable water components, i.e. toilet flushing. ▪ Earthworks would be designed to minimise the extent of cut and fill and allow the balance of soil to be re-used on-site. Top soil would be stockpiled for re-use within landscaped areas where possible. ▪ The site is identified as being in of moderate salinity potential. As such, Geotechnical Studies and a Preliminary Site Investigation will be included with any future EIS. ▪ As part of the proposal, an existing Council stormwater easement may require modification in order to facilitate the construction of the Stage 2 development. Consultation with the Cumberland City Council's stormwater engineer is currently underway to determine the required scope of works and the potential options to minimise impact to the existing civil infrastructure and associated easements.
Contamination	▪ No land within 500m of the subject site has been identified on the list of NSW contaminated sites notified to the EPA. ▪ Section 10.7 (2) and (5) Planning Certificate does not identify the land as contaminated land. ▪ Notwithstanding, a Preliminary Site Investigation will be prepared in accordance with the provisions of SEPP 55 to accompany the future EIS.
Flora and fauna	▪ The portion of the site where the extension to the Clinic is proposed is presently used for car parking. Vegetation clearing will be required; however, the nature of such clearing would require further arboricultural assessment, which would be detailed in the EIS subsequent to this SEARs request. ▪ The land is not identified as biodiversity certified land, nor is it subject of a biobanking agreement. ▪ Upon review of the Biodiversity Values Map published by NSW Government, the Site is not identified to contain any biodiversity values. The Site is also not identified to contain any terrestrial biodiversity or riparian lands under HLEP2013.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

	▪ The landscape design of the Site will be informed by the arboricultural assessment to be undertaken as part of the development.
Noise	▪ The Site is located in the immediate proximity of sensitive land uses, being low density residential properties to the north, east and south. Noise associated with construction are unavoidable but will comply with the relevant standards. ▪ The Site is not situated within proximity of any significant noise-generating activities that would adversely affect the operation of the proposed hospital or would require any specific design alterations. ▪ The acoustic impacts generated through the construction and future operation of the proposed private hospital would be assessed as part of the future EIS, having regard for the relevant noise criteria. ▪ The SSD Application would consider both construction and operational acoustic impacts (noise and vibration) having regard to the NSW Environment Protection Authority (EPA) Industrial Noise Criteria, including the Noise Policy for Industry (NPI) document, the Interim Construction Noise Guideline, as well as relevant controls articulated within both the Huntingwood Precinct DCP and BDCP2015. ▪ Potential noise impacts generated during the construction phase of the proposed development would be localised through construction traffic and construction equipment, for which a Construction Noise and Vibration Management Plan (CNVMP) would be implemented to address any potential noise and vibration impacts anticipated during the construction phase. ▪ Operational noise would be attributed to proposed plant and equipment including back-up generators distributed throughout the Subject Site. It is noted, that a complete Noise Impact Assessment would be undertaken by a suitably qualified Acoustic Engineer to confirm the proposed development does not exceed the relevant acoustic emissions criteria. Where potential impacts are identified suitable acoustic attenuation and mitigation measures would be recommended and implemented where required.
Air quality	▪ Given the nature of the proposed development, being for a health services facility, it is not anticipated that there will be any unacceptable air quality impacts. ▪ During construction, air quality will be managed through appropriate dust mitigation measures. ▪ An Air Quality Impact Assessment would be prepared as part of any future SSDA.
Ecologically sustainable development	▪ The development will be designed in accordance with the principles of Ecologically Sustainable Development (ESD), incorporating active and passive design elements to reduce energy and water consumption and reduce greenhouse gases.
Waste	▪ Waste generated during construction will be managed through a Waste Management Plan that makes provision for waste minimisation, storage, separation, transportation and disposal.

Request for Secretary's Environmental Assessment

Proposed State Significant Development – Extension of Wentworthville Northside West Clinic
23-27 Lytton Street, Wentworthville (Lot 1 DP787784)

	▪ Ongoing waste generation associated with the operation of the hospital will be managed as existing and detailed in a Plan of Management.
Traffic and transport	▪ The proposed carpark, inclusive of disabled spaces, has been designed with sufficient capacity to accommodate all car parking on the Subject Site with no off-site overflow. ▪ To reduce car use and the traffic generation associated with new development car-sharing and public transport will be promoted amongst staff, particularly with Wentworthville railway station in close proximity to the Subject Site. ▪ All areas for vehicle access, manoeuvring and parking will be designed to comply with relevant Australian Standards. All site ingress/egress and internal circulation will be in a forward direction. ▪ A Traffic Impact Statement will be prepared as part of the future EIS to address all matters related to traffic generation, surrounding road network, vehicular access, car parking, transport and trip generation. Swept paths will be included within the Traffic Impact Statement to demonstrate that the development provides suitable arrangements for vehicle manoeuvring.
Heritage	▪ The site is not identified as, or in proximity of, a heritage conservation area. Given that the proposal incorporates a well-resolved built form, the proposed development is not anticipated to result in any unacceptable impacts on the significance or views to and from the local heritage item I135 known as Federation cottage, which is located approximately 71m to the west of the Site at the closest point.
Hazards	▪ The Section 10.7 (2) and (5) Planning Certificate identifies the land as being subject to flood related development controls. As part of the EIS, a Flood Report will be carried out which will identify the extent of flooding on site and provide details for mitigation.
Other Infrastructure & Services	▪ All essential infrastructure services would be augmented accordingly for proposed development, including water, sewer, electricity and communications.
Socio Economic	▪ The proposed development would positively impact on the social and economic conditions of the Greater Sydney Region. Construction jobs are expected to be in the order of 60 and 23 FTE operational jobs will be provided for once complete. ▪ A total investment value for the development will be \$41,649,549 AUD.

PART F CONCLUSION

The proposal is for an extension to the existing Wentworthville Northside West Clinic; thus, the development is identified as State Significant Development pursuant to Schedule 1 of the SRD SEPP.

The key objectives of the proposal are to respond to the growing demand for health facilities in the Greater Sydney Region, which will be achieved through the delivery of a well-designed and high quality extension to the existing Clinic. The layout and design of the proposed extension has also considered the environmental constraints and surrounding sites to ensure compatibility with the local context.

Responding to these objectives, the proposed extension will involve the construction and use of the Stage 2 building comprising 95 inpatient units, nine (9) consulting rooms and associated car parking and landscaping. The proposal also includes alterations and additions to the existing Stage 1 building.

As noted throughout this document, the development will be carried out in an environmentally sustainable manner and shall implement suitable mitigation measures to ensure that the amenity and function of surrounding land uses are not compromised.

It is requested that the DPIE issue formal SEARs for the preparation of an Environmental Impact Statement (EIS) for the proposal as State Significant Development.