



# The Sutherland Hospital Operating Theatre Upgrade

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State Significant Development Assessment Report  
SSD-11099584

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Title: The Sutherland Hospital Operating Theatre Upgrade

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*Cover image: The Sutherland Hospital Operating Theatre Upgrade, viewed from the north-west (Source: Applicant's EIS).*

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# Glossary

Abbreviation	Definition
<b>AHD</b>	Australian Height Datum
<b>BCA</b>	Building Code of Australia
<b>CIV</b>	Capital Investment Value
<b>Council</b>	Sutherland Shire Council
<b>Department</b>	Department of Planning, Industry and Environment
<b>DPI</b>	Department of Primary Industries, DPIE
<b>EESG</b>	Environment, Energy and Science Group
<b>EIS</b>	Environmental Impact Statement
<b>EPA</b>	Environment Protection Authority
<b>EP&amp;A Act</b>	Environmental Planning and Assessment Act 1979
<b>EP&amp;A Regulation</b>	Environmental Planning and Assessment Regulation 2000
<b>EPBC Act</b>	Environment Protection and Biodiversity Conservation Act 1999
<b>EPI</b>	Environmental Planning Instrument
<b>ESD</b>	Ecologically Sustainable Development
<b>Heritage</b>	Heritage NSW, Department of Premier and Cabinet
<b>LEP</b>	Local Environmental Plan
<b>Minister</b>	Minister for Planning and Public Spaces
<b>RMS</b>	Roads and Maritime Services, TfNSW
<b>SEARs</b>	Planning Secretary's Environmental Assessment Requirements
<b>Planning Secretary</b>	Secretary of the Department of Planning, Industry and Environment
<b>SEPP</b>	State Environmental Planning Policy
<b>SRD SEPP</b>	State Environmental Planning Policy (State and Regional Development) 2011
<b>SSD</b>	State Significant Development
<b>TfNSW</b>	Transport for NSW

# Executive Summary

This report provides an assessment of a State significant development (SSD) application for the redevelopment and expansion of the operating theatre complex at The Sutherland Hospital, which is located at the corner of Kingsway and Kareena Road, Caringbah (SSD-11099584). The application has been lodged by Heath Administration Corporation (the Applicant) and the site is located within the Sutherland Shire local government area.

## Introduction

The Sutherland Hospital campus is bounded by Kingsway to the north, Kareena Road to the west, the Cronulla railway line to the south and residential properties fronting Hinkler Avenue to the east. The site typically slopes north-south towards the railway corridor.

The application seeks approval for the redevelopment and expansion of the Sutherland Hospital operating theatre complex. The proposal has a Capital Investment Value (CIV) of \$63,567,789 and is predicted to generate 377 construction jobs and 146 full-time equivalent jobs during operation. The proposal is SSD under clause 4.36 of the *Environmental Planning & Assessment Act 1979* (EP&A Act) and has a CIV greater than \$30 million pursuant to clause 14 of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011. Therefore, the Minister for Planning and Public Spaces is the consent authority.

## Community Engagement

The Environmental Impact Statement (EIS) was publicly exhibited between 4 May 2021 and 31 May 2021 (28 days). The Department of Planning, Industry and Environment (the Department) received a total of five submissions from public authorities and Sutherland Shire Council (Council) in the form of comments.

On 12 August 2021, the Applicant submitted its Response to Submissions (RtS) that sought to address public authority comments and made minor amendments to the original proposal, including the incorporation of a wayfinding strategy and the provision of additional bicycle parking and end-of-trip facilities. Council and Transport for NSW (TfNSW) provided comments on the RtS. The Applicant subsequently submitted a Supplementary Response to Submissions (SRtS) that responded to the comments made in relation to the RtS.

## Assessment

The Department identified built form and design, landscaping and outdoor space, and traffic, transport and access as being the key issues for assessment.

The Department is satisfied that the key issues have been appropriately addressed by the Applicant or have been addressed through recommended conditions of consent. The Department concludes that the proposal is in the public interest and is able to be approved, subject to conditions.

The Department considered the merits of the proposal in accordance with the relevant matters under section 4.15(1) and the objects of the EP&A Act, the principles of ecologically sustainable development, and issues raised in submissions as well as the Applicant's response to these.

The Department's assessment concludes the:

- height and design of the proposed extension is appropriate in the site context, would not have a detrimental visual impact on the character of the surrounding area, and responds positively to the site and its context while balancing the need to provide for the demand for improved and expanded health facilities.
- removal of 15 trees is unavoidable and justified in this instance to facilitate construction and provide improved and expanded health facilities to meet growing demand. The proposal includes the provision of 19 replacement trees and other landscaping, and the provision of funding to Council for the planting of 64 trees off-site, as recommended via condition. This would ensure the provision of a total of 83 trees.
- landscaping scheme would provide safe and pleasant outdoor spaces for staff, patients and visitors, improved cyclist amenity and environmental outcomes on the site and surrounding area.
- proposed travel mode share, which seeks to encourage sustainable travel modes (walking, cycling and public transport) and reduce car dependency, is appropriate and the recommended sustainable transport measures and conditions of consent ensure that the proposal would not have significant adverse impacts on the local traffic network.
- car and bicycle parking and facilities are sufficient to meet demand, and vehicle access arrangements from Kareena Road are appropriate.
- operational traffic impacts of the proposal can be managed and mitigated subject to conditions of consent.
- construction traffic can be accommodated by the surrounding road network.
- proposal would have acceptable amenity impacts regarding operational noise, subject to conditions.

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# 1 Introduction

This report provides an assessment of a State significant development (SSD) application (SSD-11099584) for the redevelopment and expansion of the operating theatre complex at The Sutherland Hospital, which is located at the corner of Kingsway and Kareena Road, Caringbah.

The proposal seeks approval for alterations and extensions to the existing hospital South Wing building to expand existing surgical facilities, with works including:

- demolition, earthworks, ground remediation works and tree removal.
- construction of a three storey extension west towards the existing Ambulance Station, to include additional operating theatres, endoscopy suites, a Magnetic Resonance Imaging (MRI) suite, a surgical short stay unit, clinical support facilities and associated staff amenities.
- soft and hard landscaping works.
- alterations to the existing ambulance access road.
- in-ground services installation.

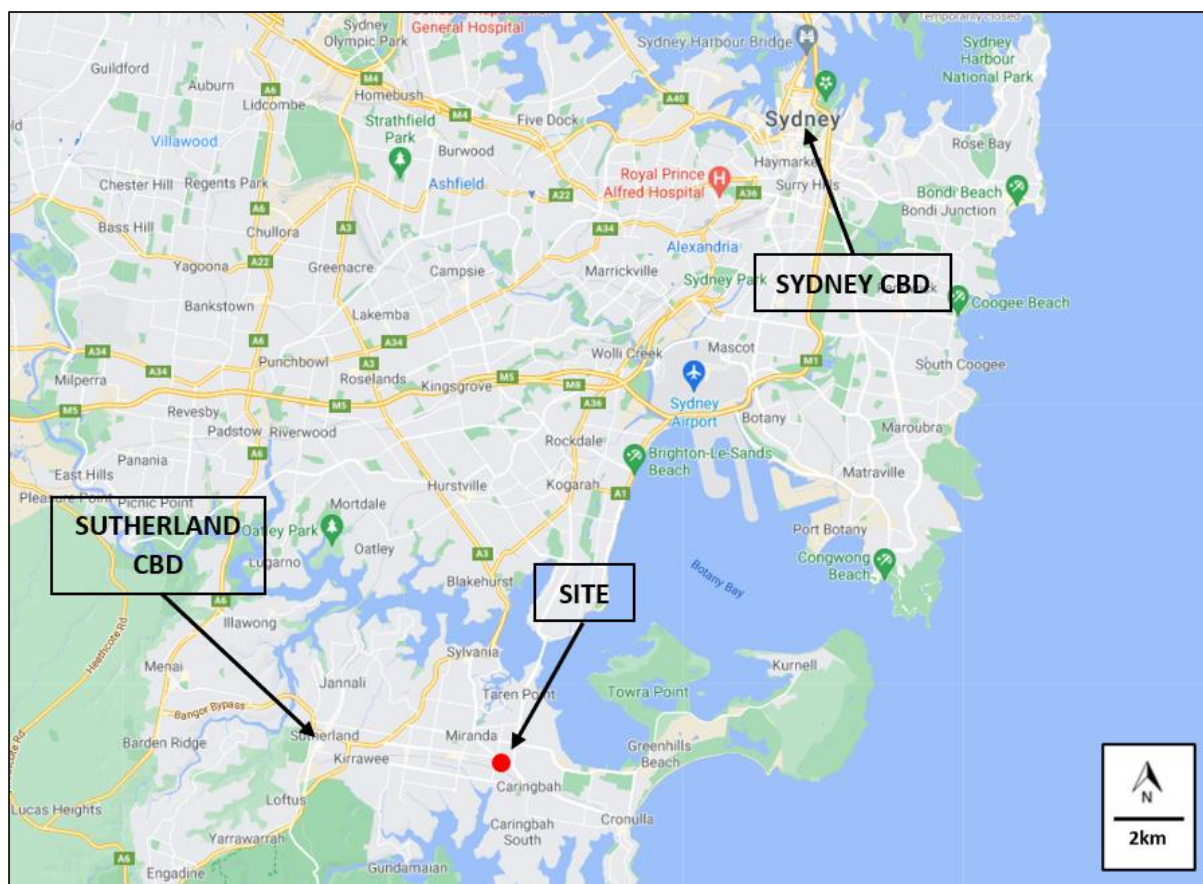
The application has been lodged by Health Infrastructure on behalf of Health Administration Corporation (the Applicant). The site is within the Sutherland Shire local government area (LGA).

## 1.1 Site description and context

### Hospital Campus

The site is known as The Sutherland Hospital Campus (Hospital Campus). The site is located at the corner of the Kingsway and Kareena Road, Caringbah, legally described as Lot 1 DP 432283, Lot 1 DP 119519 and Lot 1 DP 398975 (which is occupied by the Ambulance Station under lease by NSW Ambulance) (Figure 2). The site is located approximately 20 kilometres (km) south of the Sydney Central Business District (CBD), 5km east of the Sutherland CBD and 750 metres (m) north-east of the Caringbah Railway Station.





**Figure 1 | Regional Context Map (Base source: Google Maps 2021)**

The Hospital Campus is rectangular in shape and occupies approximately 9.3 hectares. The campus is bounded by Kingsway to the north, Kareena Road to the west, the Cronulla railway line to the south and residential properties fronting Hinkler Avenue to the east (**Figure 2**). The site typically slopes north-south towards the railway corridor.

The site is a 375-bed metropolitan hospital that forms part of the South Eastern Sydney Local Health District (SESLHD), providing acute specialist services (surgical, emergency critical care, medical, women's and children's health), sub-acute services (aged care and rehabilitation) as well as ambulatory care. The hospital is a Centre of Excellence for specialty surgeries including gastroenterology, orthopaedics and joint replacements.

The Hospital Campus was initially established in 1958 and has subsequently been significantly redeveloped with multiple additions and refurbishments. The main hospital building is located at the centre of the campus and is three-to-four storeys in height, bounded by a number of single storey buildings of varying age and quality to the south and east. A single storey Ambulance Station and associated at-grade carpark is located along the western boundary of the campus site, fronting Kareena Road. Car parking is interspersed throughout the campus, including five at-grade carparks to the north, west, east and south of the main hospital building, and a multi-storey carpark to the south adjacent to the railway corridor. The campus contains small clusters of trees interspersed throughout.

An internal ring road allows movement around the site. Vehicular access into the campus is via three non-signalised driveways, comprising:

- a northern driveway providing west-bound access from Kingsway.



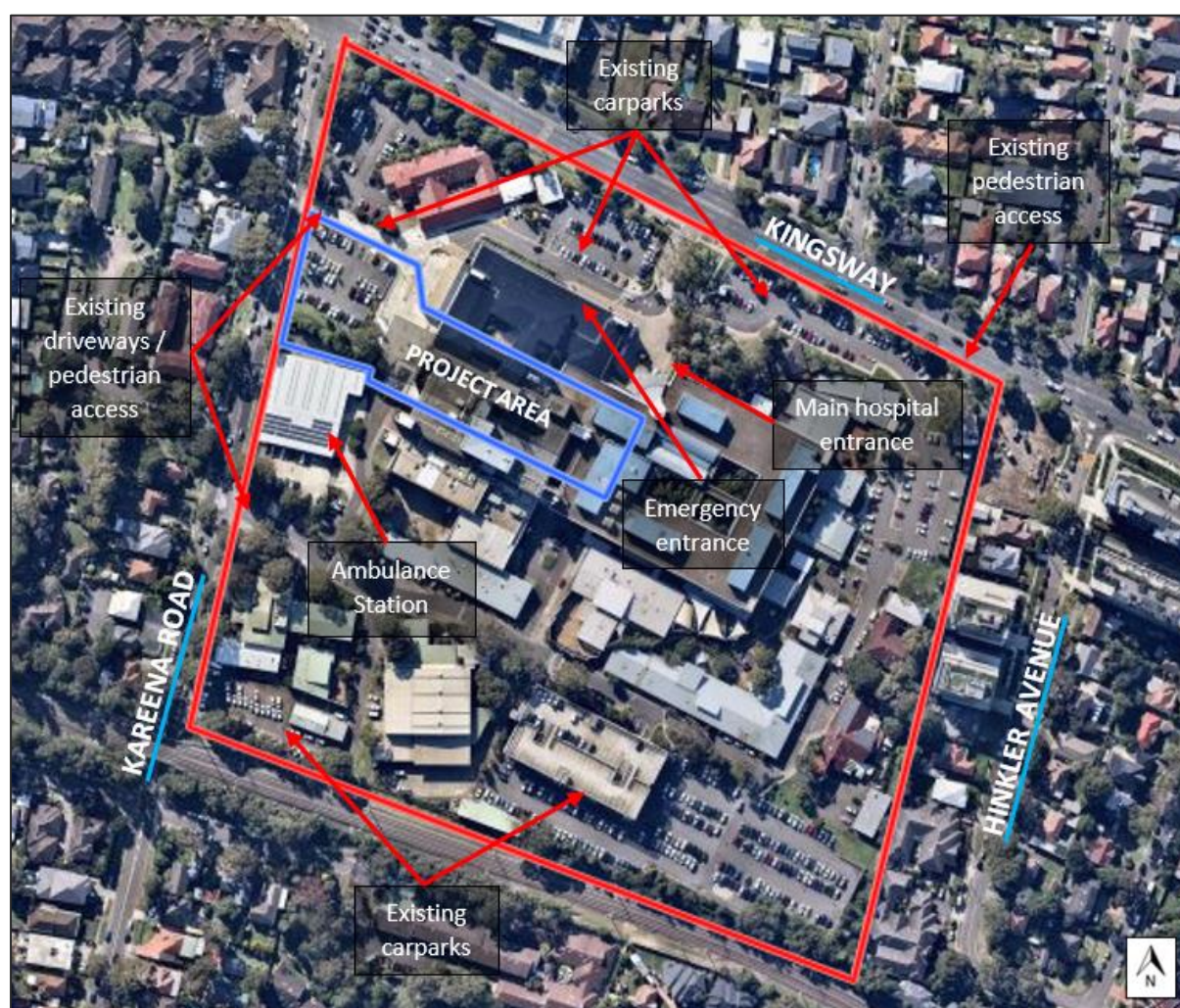
- a north-western driveway providing south-bound access from Kareena Road.
- a south-western driveway providing roundabout access from Kareena Road.

Pedestrian access to the site is via pavements at each of the three access driveways, and a dedicated pedestrian gate in the north-east corner of the site providing direct access from Kingsway. There is no pedestrian or vehicle access from the south or east.

### Project area

The proposed development area is located within the western portion of the Hospital Campus fronting Kareena Road, to the north of the Ambulance Station. It is occupied by the South Wing hospital building, an at-grade carpark (CP3 car parking area), the internal ring road and landscaping. The area has been largely developed with the predominate form of vegetation comprising young plantings, and there are no threatened species or threatened ecological communities, or their habitat on the site.

The project area can be directly accessed via the two driveways fronting Kareena Road. The Hospital Campus, including the project areas, is shown in **Figure 2**. Site photos are provided in **Figures 3 to 6**.



**Figure 2 |** Hospital Campus site layout (Base source: nearmap 2021)





**Figure 3 |** Existing South Wing building western elevation (Source: Google Maps 2021)



**Figure 4 |** Main hospital entry (left), southern hospital entry (right) (Source: Applicant's EIS)



**Figure 5 |** Emergency drop-off (left), Kareena Road southern access (right) (Source: Applicant's EIS)



**Figure 6 | Ambulance Station from the west (left) and north-east (right) (Source: Applicant's EIS)**

## 1.2 Surrounding context

The Hospital Campus is located within the Caringbah town centre, which is primarily centred around the junction of Kingsway and President Avenue and the Caringbah Railway Station, approximately 750m to the south-east. The campus is located immediately within a well-established predominantly residential neighbourhood, ranging in density from R2 Low Density to the north, west and south, and R4 High Density to the east adjoining the site and fronting Hinkler Avenue. The surrounding context includes (as shown in **Figure 7**):

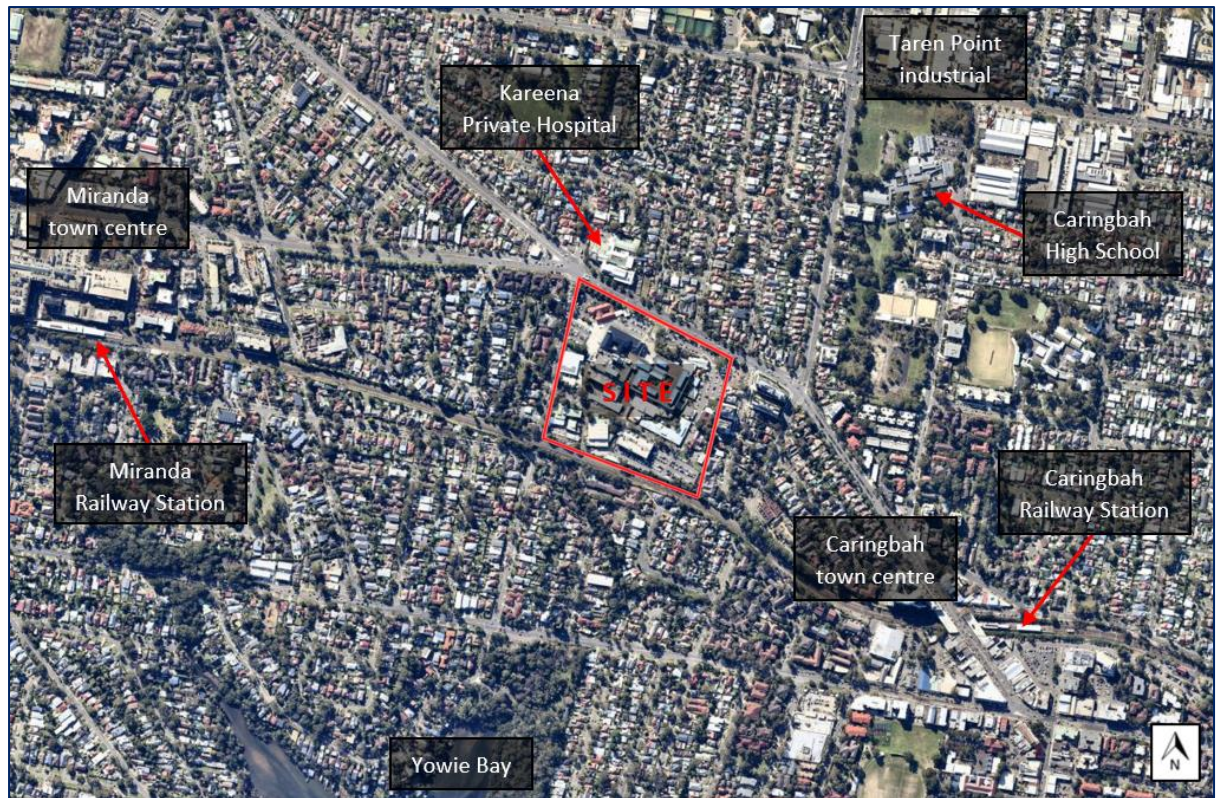
- **North:** low-scale residential dwelling houses and the Kareena Private Hospital (two to three storeys) on the northern side of Kingsway. Further to the north and north-east is Caringbah High School and the Taren Point industrial area.
- **East:** the site adjoins a mix of medium density residential development, up to six storeys in height, and low-scale residential dwelling houses. The primary hub of the Caringbah town centre is further to the east and south-east.
- **South:** low-scale residential dwelling houses and an aged-care facility beyond the southern side of the railway corridor. Yowie Bay, which forms part of Port Hacking, is located approximately 600m to the south.
- **West:** low-scale residential dwelling houses and a cluster of private health services on the western side of Kareena Road. Miranda town centre and Miranda Railway Station are located approximately 800m to the west.

### Transport and access

The Hospital Campus is 750m and 850m walking distance, respectively, from Caringbah and Miranda railway stations (**Figure 7**). Both stations are served by the T4 train line with an operating frequency of 15 minutes during peak.

The Hospital Campus is serviced by bus routes running between Hurstville in the north, Cronulla in the east and Miranda and Sutherland in the west, including bus routes 477, 478, 969, 971, 977, 985 and 988, with operating frequencies of each route between 30-60 minutes. The bus routes connect the campus with both the Caringbah and Miranda town centres and railway stations.





**Figure 7 |** Hospital Campus site layout (Base source: nearmap 2021)

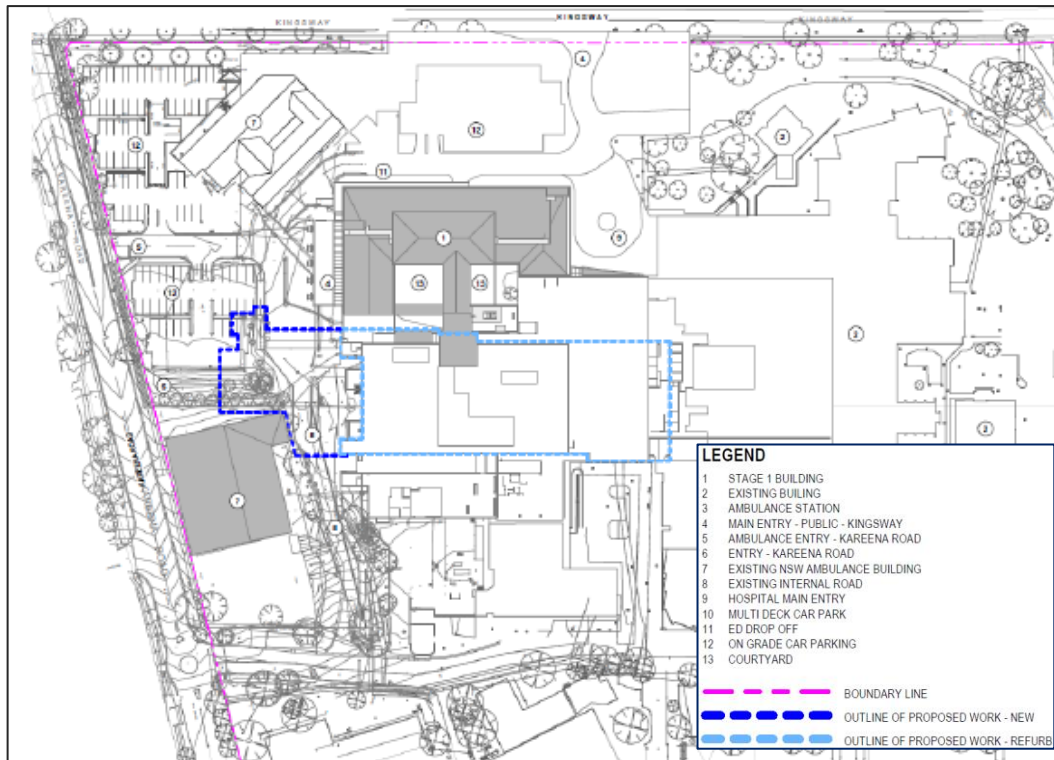
## 2 Project

The key components and features of the proposal are provided in **Table 1** and shown in **Figures 8** to **15**.

**Table 1 | Main Components of the Project**

Aspect	Description
<b>Project Summary</b>	Alterations to the existing South Wing building and the erection of a three storey extension, west towards the Ambulance Station to expand existing surgical facilities.
<b>Demolition, site preparation and remediation</b>	<ul style="list-style-type: none"> <li>• Demolition of existing western elevation of South Wing building including porte-cochère, and internal partitions.</li> <li>• Preliminary earthworks including stripping of existing asphaltic and concrete pavements, grass and topsoil/root affected soils.</li> <li>• Removal of 15 trees.</li> </ul>
<b>Built form and design</b>	<ul style="list-style-type: none"> <li>• Refurbishment of existing South Wing building facilities including operating theatres, endoscopy suites, post-anaesthesia care unit (PACU), short stay unit / discharge and staff amenities.</li> <li>• Construction of a three storey (14m high) South Wing extension (building levels 2 to 4) west towards the existing Ambulance Station, containing additional operating theatres, a new Magnetic Resonance Imaging (MRI) suite, a new Central Sterilising Services Department (CSSD), additional plant space, fire stairs and lift core. The extension is: <ul style="list-style-type: none"> <li>○ set above an at-grade undercroft with ambulance through-access, incorporating soft and hard landscaping and respite areas.</li> <li>○ set back from Kareena Road and set within the existing mass of the hospital building.</li> <li>○ designed to incorporate facade materials that are contemporary in design with external finishes that complement the surrounds and in response to the Aboriginal narrative of 'colours of country', including brick, cladding, perforated mesh, concrete, aluminium louvres.</li> </ul> </li> </ul>
<b>Gross floor area</b>	<ul style="list-style-type: none"> <li>• New build: 3,578sqm.</li> <li>• Refurbishment: 3,200sqm.</li> <li>• TOTAL: 6,778sqm.</li> </ul>
<b>Layout / Uses</b>	<ul style="list-style-type: none"> <li>• Level 2 (at-grade): new MRI suite and undercroft with ambulance access road and soft and hard landscaping.</li> <li>• Level 3: new and refurbished operating theatres, PACU, endoscopy suites, short stay unit / discharge facilities and staff amenities.</li> <li>• Level 4: new CSSD and additional plant space.</li> </ul>

<b>Car, bicycle and service vehicle parking</b>	<ul style="list-style-type: none"> <li>• Removal of 12 existing car parking spaces from Car Park 3, reducing the total number of spaces across the Hospital Campus to 841.</li> <li>• Provision of 11 additional bicycle parking rails and end-of-trip facilities (lockers and two male and two female showers).</li> <li>• Retention of Ambulance Station access via undercroft.</li> </ul>
<b>Public domain and landscaping</b>	<ul style="list-style-type: none"> <li>• Removal of 15 trees, and tree protection measures for remaining trees.</li> <li>• Local site landscaping and public domain improvements, including: <ul style="list-style-type: none"> <li>○ planting of 19 replacement trees.</li> <li>○ outdoor seating/respite areas beneath undercroft.</li> <li>○ improvements to egress paths and emergency/service and maintenance access.</li> <li>○ 1:20 ramp access to new lift core.</li> <li>○ external lighting, including lighting to existing car park area and emergency lighting.</li> </ul> </li> </ul>
<b>Hours of Operation</b>	<ul style="list-style-type: none"> <li>• 24 hours per day, every day.</li> </ul>
<b>Signage</b>	<ul style="list-style-type: none"> <li>• Installation of five external signage panels, including three building entry identification signs, one entry notice and one hospital crest.</li> <li>• Installation of internal wayfinding signage.</li> </ul>
<b>Jobs</b>	<ul style="list-style-type: none"> <li>• 146 full-time equivalent (FTE) operational jobs.</li> </ul>
<b>CIV</b>	<ul style="list-style-type: none"> <li>• \$63,567,789</li> </ul>



**Figure 8 |** Proposed Hospital Campus site layout (Source: Applicant's EIS 2021)

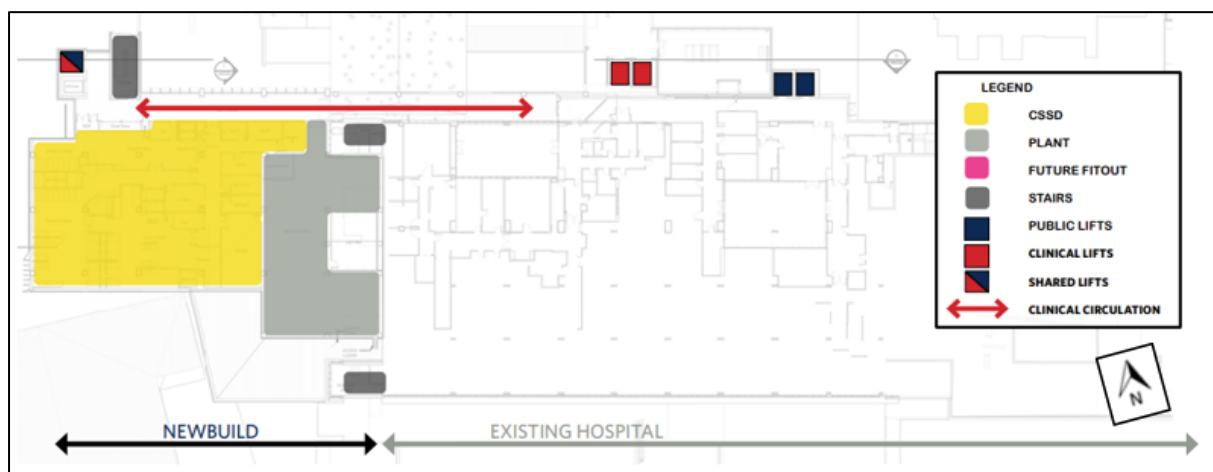




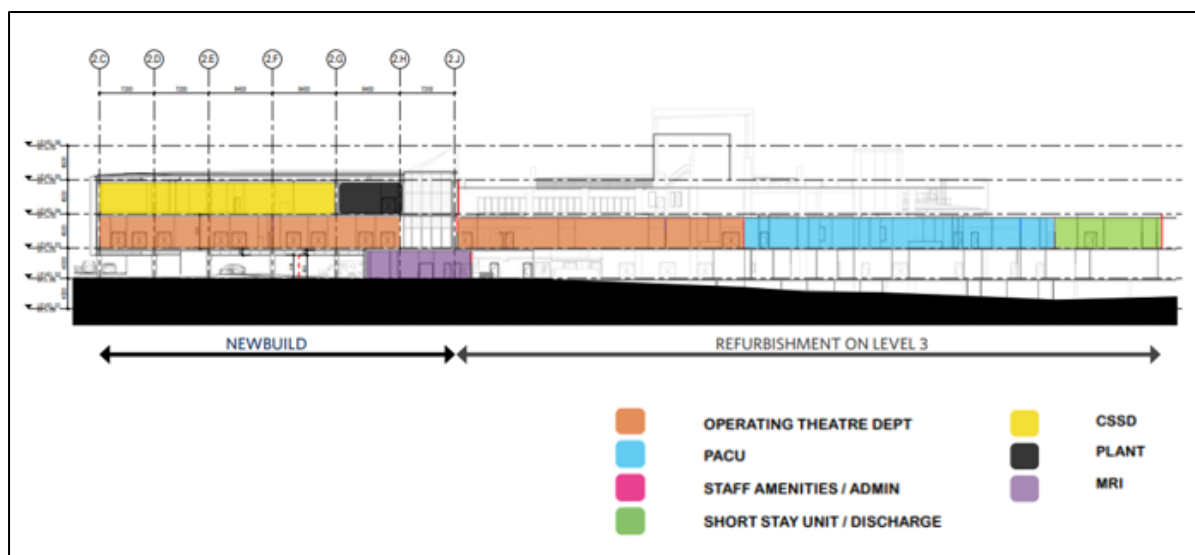
**Figure 9 |** Proposed Level 2 (at-grade) layout (Source: Applicant's RtS 2021)



**Figure 10 |** Proposed Level 3 layout (Source: Applicant's RtS 2021)



**Figure 11 |** Proposed Level 4 layout (Source: Applicant's RtS 2021)



**Figure 12 |** Proposed east-west section (Source: Applicant's RtS 2021)



**Figure 13 |** Proposed building perspective from north-west (Source: Applicant's RtS 2021)



**Figure 14** | Indicative view from north-west approach (Source: Applicant's RtS 2021)



**Figure 15** | Proposed northern elevation (Source: Applicant's RtS 2021)

## 2.1 Physical layout and design

The proposed extension of the existing South Wing building extends westward over the existing Car Park 3, toward Kareena Road and the existing Ambulance Station. The extension has a rectangular shaped footprint, with a solid core located at the north-west corner fronting Car Park 3. The structure would be constructed as a cantilever over the existing ambulance access route, with an undercroft beneath. Due to the fall of the land, Level 2 of the building is at-grade fronting the undercroft area, and Levels 3 and 4 above.

The extension is of a modern / contemporary design with external materials and finishes that complement the surrounding natural and built environment, as shown in **Figures 13 to 15**. Hard and



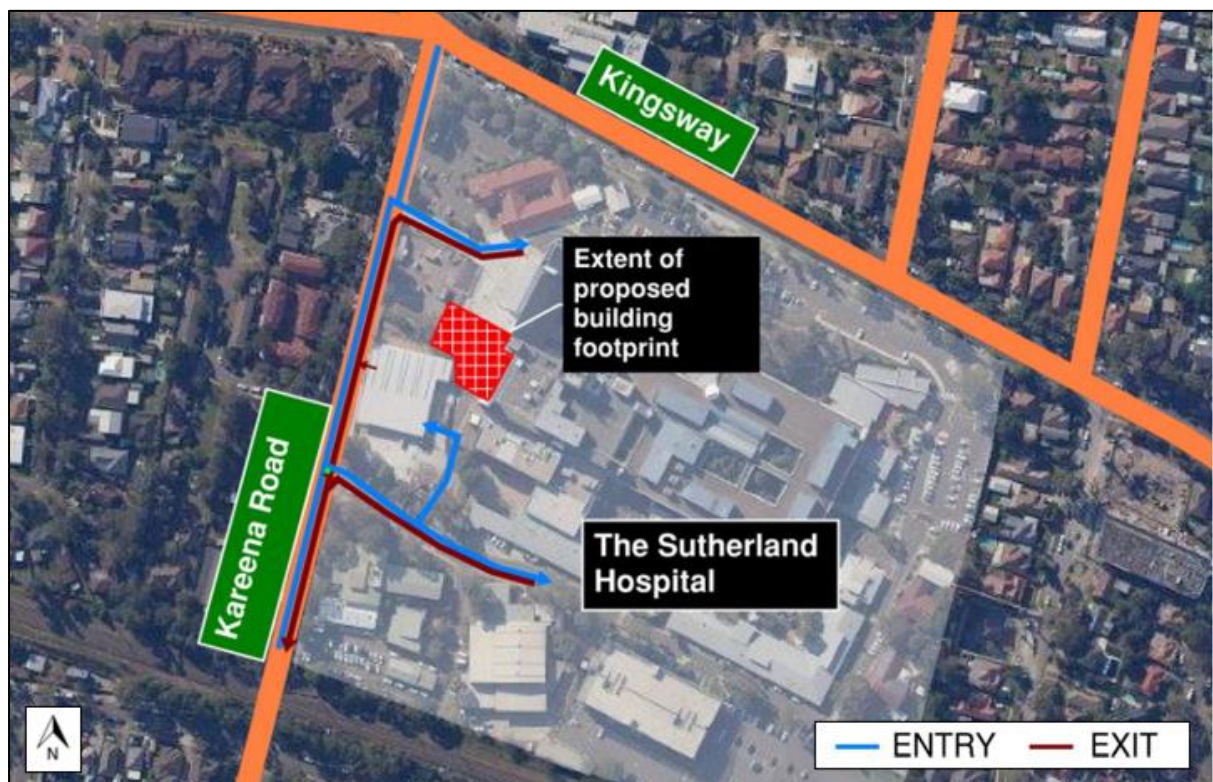
soft landscaping is proposed around the building and within the undercroft area, including 19 on-site replacement trees. The solid concrete north-western core provides an easily identifiable access point and anchors the overall structure to the ground (**Figure 15**).

### **Pedestrian, bicycle and vehicular access**

Construction of the extension would close the internal roadway, which connects the northern and southern portion of the hospital site and facilitates vehicle access to the emergency department and car parking areas located to the north of the site. To address this, the Applicant has advised that an alternative right-turn arrangement at the Kareena Road north access driveway has been determined via a Review of Environmental Factors (REF), to be implemented prior to commencement of construction works for the proposal (**Figure 16**).

The proposal includes the loss of 12 car parking spaces, resulting in a total number of 841 available parking spaces across the overall Hospital Campus. No additional bicycle parking spaces or end-of-trip (EOT) facilities are proposed.

Entry to the north-west core from the existing carpark will be restricted to staff and surgical deliveries. Public access to the hospital would remain via the main hospital entrance.



**Figure 16** | Access upgrades from Kareena Road, to be undertaken via an REF (Source: Applicant's EIS 2021)

## **2.2 Uses and activities**

The proposed refurbished and extended building would be used to provide expanded operating facilities, increasing theatre capacity, improving efficiencies and access to services and enabling

implementation of new models of care and surgical clinical pathways. specifically designed to accommodate enhanced operating facilities.

The facilities would accommodate an additional 146 FTE jobs. The proposed operating hours are 24 hours per day, every day.

### **2.3 Construction staging / hours**

The proposed construction hours are as follows:

- Monday to Friday: 7am to 6pm.
- Saturday: 8am to 1pm.
- No construction activities to be carried out on Sundays or public holiday.

The Applicant proposes a staged construction of the development over approximately 116 weeks from December 2021 to February 2024, as follows:

- Stage 1: Construction of new extension.
- Stage 2: Decanting activities from existing areas to new extended areas and temporary accommodation.
- Stage 3: Refurbishment of existing surgical facilities.

### 3 Strategic context

The Applicant has indicated that the objective of the proposal is to increase operating theatre capacity and to provide health services for chronic and complex disease. These objectives are associated with the predicted future demand of the region's ageing and growing population. The proposal seeks to meet these objectives through:

- improved access to surgical services and patient flow.
- improved functionality to support workflow and contemporary models of care.
- increased surgical capacity and improved efficiency.
- improved work performance and productivity.
- providing a flexible, contemporary operating theatre environment.

The Department considers that the proposal is appropriate for the site as it is consistent with:

- NSW Government's key policy priorities.
- The Greater Sydney Commission's Greater Sydney Regional Plan *A Metropolis of Three Cities*, as it would facilitate the delivery of health infrastructure and services to meet the needs of a growing and ageing population.
- the vision outlined Greater Sydney Commission's *South District Plan*, as it would provide services and social infrastructure to meet people's changing needs (Planning Priority S3) and would provide services for the community in an existing local centre (Planning Priority S6).
- Transport for NSW's *Future Transport Strategy 2056*, as it would provide additional health care facilities and new employment opportunities in an accessible location, close to public transport.
- *State Infrastructure Strategy 2018 – 2038 Building the Momentum*, as it would provide investment in health infrastructure and would enable more complex and higher volumes of services to be delivered.
- Planning Priority 13 of the *Sutherland Shire Local Strategic Planning Statement*, as it would co-locate specialist and allied health services within an existing cluster and would provide health services required by an aging population.
- the land use objectives of the SP1 Special activities zone, as designated by the *Sutherland Shire Local Environmental Plan 2015*, as the project is in keeping with the special characteristics of the site and its existing use.
- the new building and associated refurbishment have a CIV of \$63,567,789 and will provide 377 construction jobs and 146 new jobs once operational.



## 4 Statutory Context

### 4.1 State significance

The proposal is SSD under section 4.36 (development declared SSD) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the development is for the purposes of a hospital and has a CIV greater than \$30 million pursuant to clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011.

The Minister is the consent authority under section 4.5 of the EP&A Act.

In accordance with the Minister for Planning and Public Spaces delegation to determine applications, signed on 26 April 2021, the Director, Social and Infrastructure Assessments may determine the application as:

- the relevant Council has not made an objection to the application.
- there are less than 15 public submissions objecting to the application.
- a political disclosure statement has not been made for the application.

### 4.2 Permissibility

The Sutherland Local Environmental Plan (SLEP) 2015 identifies the site as being located within the SP1 Special Activities zone. The SLEP land zoning map identifies that the SP1 Special Activities Zone is for the purpose of health service facilities. Hospitals, including ancillary and incidental development are permissible with consent in this zone. The Minister for Planning and Public Spaces or a delegate may determine the carrying out of the development.

The site is not subject to any building height, floor space ratio or lot size development standards under the SLEP. Consideration of the proposal against the other requirements of the SLEP is provided at **Appendix B**.

### 4.3 Secretary's Environmental Assessment Requirements

On 10 December 2020, the Department notified the Applicant of the Planning Secretary's Environmental Assessment Requirements (SEARs). The Department is satisfied that the EIS and Response to Submissions (RtS) report adequately address the requirements of the SEARs to enable the assessment and determination of the application.

### 4.4 Biodiversity Conservation Act 2016

Under section 7.9(2) of the Biodiversity Conservation Act 2016 (BC Act), SSD applications are to be accompanied by a Biodiversity Development Assessment Report (BDAR) 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.

On 3 December 2020, the Environment, Energy and Science Group of the Department (EESG) determined that the proposed development would be unlikely to have any significant impact on biodiversity values and that a BDAR is not required. The Department supported EESG's decision and on 23 December 2020 determined that the application is not required to be accompanied by a BDAR under section 7.9(2) of the BC Act.

The Department has considered tree removal in **Section 6.2**.

## 4.5 Other approvals

Under section 4.41 of the EP&A Act, a number of other approvals are integrated into the SSD approval process, and consequently are not required to be separately obtained for the proposal.

Under section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any development consent for the application (e.g. approvals for any road works under the Roads Act 1993).

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in the assessment of the application, and included suitable conditions in the recommended conditions of consent (see **Appendix A**).

## 4.6 Mandatory Matters for consideration

### Environmental planning instruments

Under section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument (EPI) and draft EPIs that are of relevance to the development the subject of the development application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs and draft EPIs that substantially govern the proposal and that have been considered in the assessment of the proposal.

The Department has undertaken a detailed assessment of these EPIs and draft EPIs in **Appendix B** and is satisfied the application is consistent with the requirements of the EPIs.

### Objects of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent) are to be understood as powers to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at **Table 2**.

**Table 2** | Response to the objects of section 1.3 of the EP&A Act

Objects of the EP&A Act	Consideration
a) to promote the social and economic welfare of the community and a better environment by the proper	The development would ensure the proper management and development of land for the provision of health infrastructure to meet an

Objects of the EP&A Act	Consideration
management, development and conservation of the State's natural and other resources,	identified community need and would provide significant social and economic benefits to the community.
b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development as described below.
c) to promote the orderly and economic use and development of land,	The proposal would meet the objectives of the SP1 zone and would deliver improved health services and facilities for the local health area. The expansion would provide economic benefit through job creation and infrastructure investment.
d) to promote the delivery and maintenance of affordable housing,	Not applicable
e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposal would not result in the loss of any threatened or vulnerable species, populations, communities or significant habitats.
f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The proposed developments are not anticipated to result in any significant impacts upon building and cultural heritage, including Aboriginal cultural heritage. See <b>Section 6.4</b> .
g) to promote good design and amenity of the built environment,	The proposal has been reviewed by the Government Architect of NSW (GANSW) State Design Review Panel (SDRP) throughout the development of the proposed design. The Department considers the application would provide for good design and amenity of the built environment (see <b>Section 6.1</b> ).
h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The Department has considered the proposed development and has recommended a number of conditions of consent to ensure the construction and maintenance is undertaken in accordance with

Objects of the EP&A Act	Consideration
	legislation, guidelines, policies and procedures ( <b>Appendix A</b> ).
i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	The Department publicly exhibited the proposal ( <b>Section 5.1</b> ) and consulted with Council and other public authorities and considered their responses ( <b>Sections 5 and 6</b> ).
j) to provide increased opportunity for community participation in environmental planning and assessment.	The Department publicly exhibited the proposal ( <b>Section 5.1</b> ), which included notifying adjoining landowners and displaying the proposal on the Department's website.

## Ecologically Sustainable Development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle.
- inter-generational equity.
- conservation of biological diversity and ecological integrity.
- improved valuation, pricing and incentive mechanisms.

The application proposes ESD initiatives and sustainability measures, including:

- passive heating and cooling design.
- native low water landscaping.
- monitored and metered energy consumption.
- water efficient fixtures and fittings.
- durable materials with optimal thermal performance.
- covered/shaded outdoor respite areas.

The abovementioned sustainability measures will be implemented to ensure the development achieves the required rating under the Health Infrastructure Engineering Services Guidelines (incorporating Design Guidance Note 058). The Applicant has developed the Health Infrastructure ESD Evaluation Tool (ESD tool), which includes a list of nine sustainable initiative categories. The ESD tool has been previously endorsed by the Planning Secretary and outlines a self-certification approach to achieve 'Australian best practice' level, which, for Sydney metropolitan projects, is equivalent to 60 points out of 110 points available (based on the nine sustainable initiative categories). This approach has been designed to demonstrate an equivalency against the Green Building Council of Australia (GBCA) Green Star rating system. A condition of consent is

recommended to certify that each of these measures has been delivered and that the targeted rating has been attained by the proposed development.

The application has also been designed to exceed minimum requirements of the deemed to satisfy requirements of Section J of the National Construction Code (NCC) for energy efficiency in building fabric and building services/systems.

The Department has considered the proposed development in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts. The proposed development is consistent with ESD principles as described in sections 5.4 and 6.9 of the application EIS, which has been prepared in accordance with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

Overall, the proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives will encourage ESD, in accordance with the objects of the EP&A Act.

### Environmental Planning and Assessment Regulation 2000

Subject to any other references to compliance with the EP&A Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

### Planning Secretary's Environmental Assessment Requirements

The EIS is compliant with the Planning Secretary's Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination.

### Section 4.15(1) matters for consideration

**Table 3** identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided in **Section 6** and relevant appendices or other sections of this report and EIS's, referenced in the table.

**Table 3** | Section 4.15(1) matters for consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Satisfactorily complies. The Department's consideration of the relevant EPIs is provided in <b>Appendix B</b> .
(a)(ii) any proposed instrument	Satisfactorily complies. The Department's consideration of the relevant draft EPIs is provided in <b>Appendix B</b> .

Section 4.15(1) Evaluation	Consideration
(a)(iii) any development control plan (DCP)	Under clause 11 of the SRD SEPP, DCPs do not apply to SSD. Notwithstanding, consideration has been given to DCPs where relevant in <b>Section 6</b> .
(a)(iiia) any planning agreement	Not applicable.
(a)(iv) the regulations <i>Refer Division 8 of the EP&amp;A Regulation</i>	The application satisfactorily meets the relevant requirements of the EP&A Regulation, including the procedures relating to applications (Part 6 of the EP&A Regulation), public participation procedures for SSD and Schedule 2 of the EP&A Regulation relating to EIS.
(b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	Appropriately mitigated or conditioned (see <b>Section 6</b> ).
(c) the suitability of the site for the development	The site is suitable for the development as discussed in <b>Sections 3 and 6</b> .
(d) any submissions	Consideration has been given to the submissions received during the exhibition period. See <b>Sections 5 and 6</b> .
(e) the public interest	Refer to <b>Sections 6 and 7</b> .



## 5 Engagement

### 5.1 Department's engagement

In accordance with Schedule 1 of the EP&A Act and Part 6, Division 6 of the EP&A Regulation, the Department publicly exhibited the application from 4 May 2021 until 31 May 2021 (28 days). The application was made publicly available on the Department's website.

The Department notified adjoining landholders and relevant State and local government authorities in writing. Department representatives were unable to visit the site due to COVID-19 health order restrictions. However, a detailed desktop site analysis was undertaken, including review of mapping and satellite imagery. The Applicant also provided a detailed site description and site photographs as part of the application.

The Department has considered the comments raised in the public authority submissions during the assessment of the application. The submissions received are summarised in the following section of this report. No public submissions were received.

### 5.2 Public authority submissions

A summary of the matters raised in the public authority submissions on the EIS is provided in **Table 4** and copies of the submissions may be viewed at **Appendix A**.

**Table 4 | Summary of Agency Submissions on the EIS**

#### Sutherland Shire Council (Council)

Council provided the following comments:

- the external materials relate well to the building but the prominent staff entrance may confuse public entry and egress.
- the loss of 12 car parking spaces is likely to increase demand on existing public parking in surrounding streets.
- development adjacent to a rail corridor must consider the adverse impacts of noise and vibration.
- the noise and vibration impact assessment report incorrectly references St George Hospital. Following minor correction, the recommendations of the report should form conditions of consent.
- landscaping proposed beneath the upstairs theatre rooms will not have adequate access to sunlight and recommends that the communal landscape area be relocated to the roof.
- plant species proposed beneath the cantilever will need to be irrigated and shade and wind tolerate.
- Council's 8:1 tree replacement ratio should be implemented as a condition of consent. Replacement tree species should be endemic to the Sutherland Shire.

To supplement the above comments, Council provided recommended conditions of consent in respect of landscape design and maintenance, tree retention, replacement and protection, permitted

working hours, construction and noise management, vehicle access, carpark design and storm water drainage.

#### **Transport for NSW (TfNSW)**

TfNSW provided the following comments:

##### **Construction Traffic Management Plan (CTMP)**

- the submitted CMP does not indicate the longest/largest vehicle and the frequency of this movement.
- details of the largest/longest vehicles accessing the site are required to be submitted as part of the RtS, as well as a swept path analysis for these vehicles accessing the site.

##### **Green Travel Plan (GTP)**

An updated GTP is to be provided for TfNSW's consideration and must include:

- data from available sources (surveys, analysis of staff shift times and travel modes, and relevant transport strategies and network changes)
- aspirational, achievable and specific mode targets, identified by avoiding the use of ranges, by clarifying data and by increasing the targets for active and passive transport.
- maps and details of EOT facilities, access points, and site permeability for active travel.
- lighting or other issues around hospital access points.
- whether additional cycle parking is required.
- the potential to reduce car parking spaces for staff.
- a completed travel access guide and communications strategy.
- considers innovative ways to incorporate public and private.

#### **Heritage NSW (HNSW)**

Heritage NSW, as delegate of the Heritage Council of NSW, reviewed the ACHAR and noted that consultation with RAPs identified that there are no specific cultural values associated with the project area. HNSW advised that they support the recommendations of the ACHAR to include unexpected finds protocols which must be implemented prior to and during works.

#### **Environment, Energy and Science Group (EESG) of the Department**

EESG advised that a BDAR Waiver Request was approved by the Department of Planning, Industry and Environment on 3 December 2020.

#### **Environment Protection Authority (EPA)**

EPA advised that the proposal does not require an environment protection licence under the *Protection of the Environment Operations Act 1997*, and therefore Council is the appropriate regulatory authority.

### 5.3 Response to submissions

Following the exhibition of the application, the Department placed copies of all submissions received on its website and requested the Applicant respond to the issues raised in the submissions. The Department also identified additional issues and sought clarification from the Applicant in relation to the following:

- wayfinding across the Hospital Campus, including a wayfinding strategy.
- adequacy of existing bicycle parking and EOT facilities, noting that the proposal does not include additional facilities.
- the landscaped undercroft area, including details regarding solar access as well as the specific CPTED design principles applied to the area.
- the number of sensitive receivers to be impacted by construction noise.

On 12 August 2021, the Applicant provided a Response to Submissions (RtS) (**Appendix A**) addressing the issues raised during the exhibition of the application and proposed the following refinements:

- inclusion of a wayfinding strategy that builds on the principles established in the EIS and includes five external signage locations for building and entry identification.
- provision of additional bicycle parking and EOT facilities including 11 new cycle parking rails and new EOT facilities at Level 3 of the refurbished hospital (two male and two female showers).

The RtS was made publicly available on the Department's website and was referred to the relevant public authorities. An additional submission was received from Council and TfNSW, which are summarised in **Table 5** below.

**Table 5 | Summary of Council submission on the RtS**

#### Council

Council did not raise any objections, however noted that the design of the entry and car parking provision remains unchanged. Recommended and re-affirmed conditions of consent relating to landscaping, replacement trees on and off-site, street tree planting, tree retention and protection, site management and internal driveway and parking.

#### TfNSW

TfNSW advised that, prior to occupation, the Applicant must provide a revised GTP that:

- provides a greater analysis of travel mode data, including staff and visitor surveys and staff shift times and numbers.
- includes specific and achievable mode share targets.
- addresses the potential to reduce staff car parking on site.
- includes a completed travel access guide and communications strategy.

- identifies a mechanism for the transfer and delivery of ongoing actions from Health Infrastructure NSW to the Local Health District, post occupancy.
- 

## 5.4 Supplementary Response to Submissions

During September 2021, the Department sent four requests to the Applicant to provide additional information to clarify: the total gross floor area (GFA) of the development; the number of trees to be removed; the adequacy of proposed bicycle parking and EOT facilities; the quantity of demolition works proposed; the number of signs proposed; and further details of hazardous material storage.

The Applicant provided additional information in the form of a Supplementary Response to Submissions (SRtS) to address the outstanding concerns raised by the Department (**Appendix A**).

## 6 Assessment

The Department has considered the Applicant's EIS, RtS, SRtS and the issues raised in submissions and the RtS in its assessment of the proposal. The Department considers the key issues associated with the proposal are:

- built form and design.
- landscaping and outdoor space.
- traffic, transport and access.

The key issues are addressed in **Sections 6.1 to 6.3**. Other issues considered during the assessment are discussed in **Section 6.4**.

### 6.1 Built form and design

#### Building height and bulk

The site is not subject to a building height or a floor space ratio development standard under the SLEP. The proposed extension would be three storeys (approximately 14m) in height, with a maximum height of RL55.434 (i.e. three storeys) (**Figure 12**). This would match the primary roof height of the existing South Wing building, which also contains rooftop servicing and lift/stair core overruns which exceed this height. The proposed extension is set back from the Kingsway by approximately 110m and Kareena Road by 27m.

As summarised in **Sections 1.1 and 1.2**, the site of the proposed extension is currently occupied by an at-grade carpark on the western side of the Hospital Campus adjacent to Kareena Road. The campus is comprised by buildings of three to four storeys in height. The nearest surrounding properties, comprised of primarily low-scale residential development, are approximately 50m to the west of the site on the opposite side of Kareena Road.

The extension to the South Wing building would be visible in public sightlines from Kareena Road to the west and Kingsway to the north (**Figures 17 and 18**). However, it would be set back from both roads and would match the height of the existing building, retaining the character of the Hospital Campus. Therefore, the proposed development would not appear as a dominant addition when viewed from the public realm.



**Figure 17** | Sightlines towards the proposal from Kingsway (Source: Applicant's RtS 2021)



**Figure 18 |** Sightlines towards the proposal from Kareena Road (Source: Applicant's RtS 2021)

No concerns were raised by Council or the GANSW regarding the height of the proposed development.

The Department has considered the proposed building height and bulk against the objectives outlined in clauses 4.3 and 4.4 of the SLEP and is satisfied that the development would not have a detrimental impact as:

- the extension is the same height as the existing South Wing building, retaining a consistent building line and matching the established character of the Hospital Campus.
- the proposal has balanced the reasonable developable potential of the site and the need to cater for the increasing demand for health services in the area.
- the proposal would not have adverse heritage or amenity impacts (discussed at **Section 6.4**).

The Department concludes that the scale of the proposal is appropriate within the site context and would not have a detrimental impact on the surrounding area, and therefore supports the height and scale of the proposed extension.

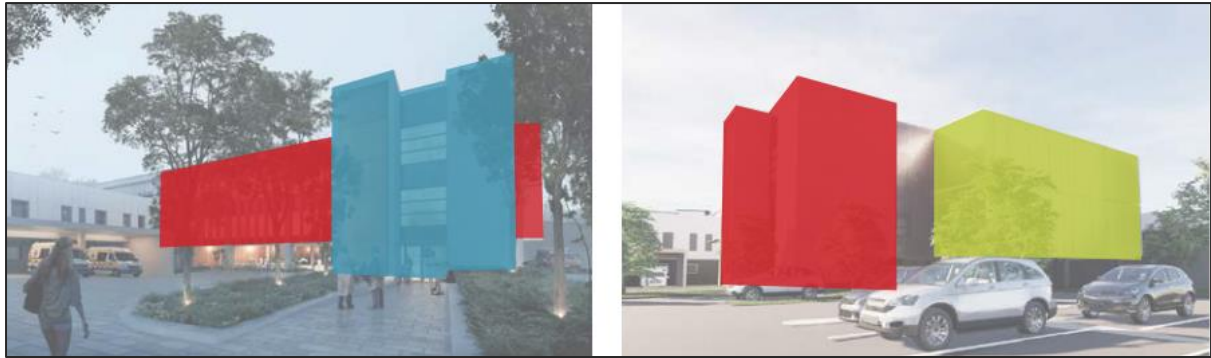
### **Building design**

The Applicant advises that, in general, operating theatres and CSSD facilities require highly controlled environments and therefore natural ventilation must be limited. To address these requirements, the proposed extension contains only a small number of window openings where appropriate, mostly restricted to the northern elevation. The building therefore has a high solid to void ratio.

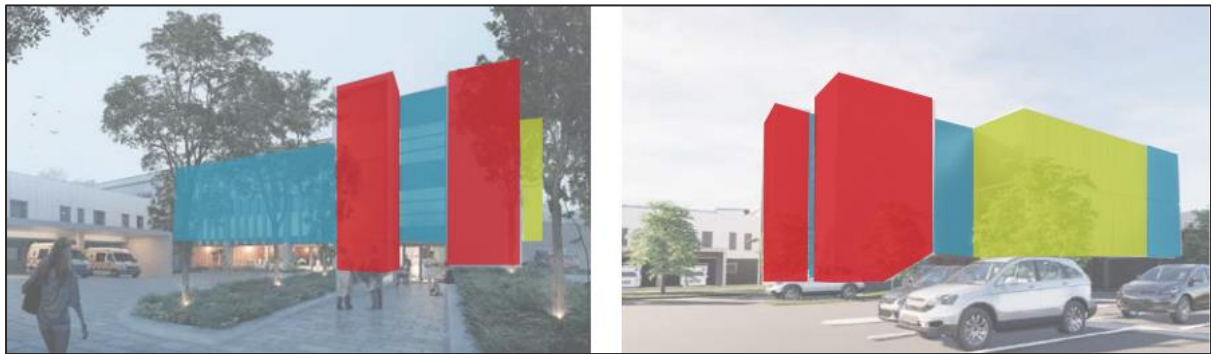
To ensure that the extension does not appear blank or flat, the façades have been designed to incorporate a range of treatments to balance the visual impact created by the largely solid nature of the building. Visual articulation is created by breaking the façade down into varying layers of scale (**Figures 19 to 21**), including a:

- primary layer, designed to break the building form down into separate masses, each with a distinguishing scale and materiality.
- secondary layer comprised of vertical cores and material changes to break down the scale of the primary layer.
- tertiary layer comprised of windows, fins and panelisation.

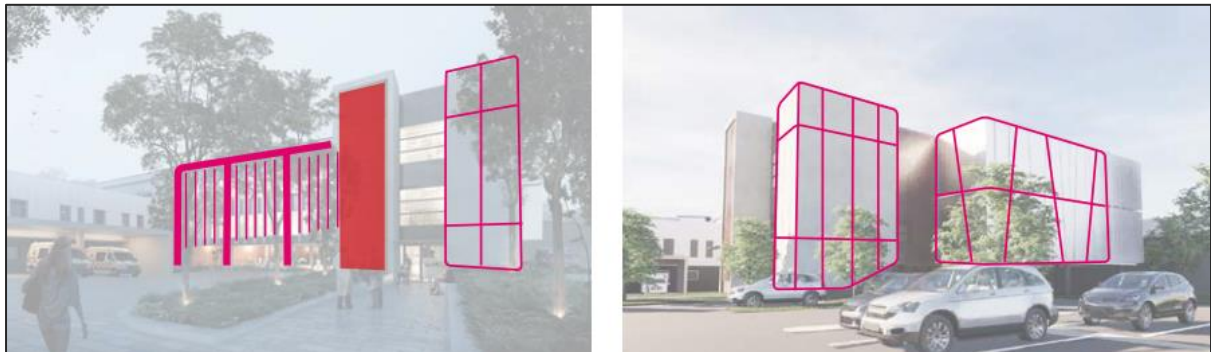




**Figure 19 |** Primary façade layer, northern elevation (left) and western elevation (right) (Source: Applicant's RtS 2021)



**Figure 20 |** Secondary façade layer, northern elevation (left) and western elevation (right) (Source: Applicant's RtS 2021)



**Figure 21 |** Tertiary façade layer, northern elevation (left) and western elevation (right) (Source: Applicant's RtS 2021)

In addition to the layering of the façade, the visual bulk of the building is further reduced through the incorporation of a range of materials and finishes including brick, concrete skin panelling, perforated mesh, white metal panel cladding, glazed curtain walls with mullions, sun shading screening, louvres and metal deck roofing. The material colour palette is neutral and complementary in tones and has been selected to reference the existing South Wing and adjoining hospital buildings.



**Figure 22 |** Proposed northern elevation and materiality (Source: Applicant's RtS 2021)



**Figure 23 |** Proposed western elevation and materiality (Source: Applicant's RtS)

Council raised no concerns regarding the design of the proposed extension and advised that they consider the external expression and chosen materials for the building relate comfortably with the existing hospital buildings.

The SDRP initially recommended that the proposal be amended to provide a more articulated façade with additional window openings, improved undercroft safety including removal of the ambulance access road and better integration with site landscaping, and a lighter overall materials colour palette. The Applicant made a number of amendments to the final design of the extension to address the SDRP recommendations, including the introduction of:

- additional articulation to the Kareena Road (western) façade (**Figure 23**).
- respite spaces for patients, visitors and staff within the undercroft area (**Figure 22**).
- a lighter material colour palette (**Figures 22 and 23**).
- additional trees and landscaping, as discussed in **Section 6.3**.

The Department notes that the current proposal does not address all of the SDRP comments. For example, the proposed extension retains minimal window openings at its western façade and none at its southern façade, and the ambulance access road has been retained within the undercroft area.



However, the Department acknowledges that the operational functionality and ambulance access requirements of the site limit the Applicant's ability to make wholesale design amendments.

The Department has considered the design of the proposed extension and:

- supports the Applicant's design amendments.
- considers that the articulation of the façade successfully reduces the visual bulk of the building.
- considers that the building's setback would ensure the proposal does not have an overbearing impact on the street frontage.
- considers the proposed design, materials and colour palette are contextually appropriate.

Noting the above design approach, the Department concludes that the proposed extension to the South Wing building would make a positive contribution to the Health Campus and is acceptable.

## 6.2 Landscaping, outdoor space and safety

### Tree removal and landscaping

Existing vegetation across the Hospital Campus is largely disturbed and cleared, however there are scattered trees throughout and street trees adjacent to the site. There is a vegetated area located immediately south of the project site within health campus, south of existing Carpark 3, comprising an earth mound of imported fill overgrown with grass, and several planted native trees and shrubs that are generally not local to the area.

The Department notes that the Applicant's EIS and accompanying landscaping plans and aboriginal report provided inconsistent figures regarding tree clearing, ranging from the loss of 10 to 20 trees. Therefore, at SRtS stage the Applicant clarified and confirmed that the proposal includes the clearing of 15 trees (see **Figure 24**).



**Figure 24** | Trees to be removed (shown in red) and to be retained and protected (shown in purple)  
(Source: Applicant's SRtS)

The proposal involves landscaping around the proposed extension, undercroft and carpark to compensate for the tree removal, including the planting of 19 trees and comprised largely of native species (including some endemic to the Sutherland Shire) accompanied by native and exotic shrubs, grasses and groundcovers. The proposed landscaping would increase the overall canopy cover of the site from 16 to 26 per cent.

As discussed in **Section 4.4**, a BDAR waiver was issued for the development as EESG and the Department concluded that the development is not likely to have any significant impact on biodiversity values. EESG did not raise any objection to the proposed tree removal or impact on biodiversity and confirmed the removal of trees did not warrant a BDAR.

Council raised no concerns with regard to the tree loss proposed, however requested that 20 replacement trees be planted across the site and that tree species better reflect species that are endemic to the LGA. Council also recommended that a total tree replacement ratio of 8:1 be provided, including replacement trees planted off-site, the cost of which is to be borne by the Applicant. Council further requested that the Applicant plant four street trees along the Kareena Road site frontage and that the proposed communal landscaped area be relocated from the undercroft to the roof to gain better access to sunlight.

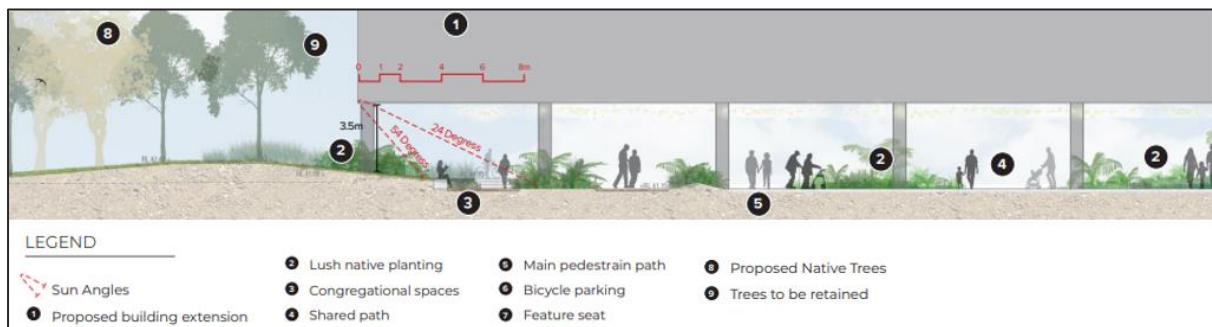
Additional landscaping details were provided within the RtS to address the comments raised by Council. The Applicant:

- confirmed that there is some flexibility within the proposed planting schedule, and that the final planting schedule and palette can be developed further.
- committed to the planting of 19 replacement trees on-site, one less than requested by Council.
- disagreed with Council's request that the communal landscaped area be relocated to the roof, however provided additional information outlining how the proposed planting schedule has been informed by and responds to the levels of solar access within the undercroft area (**Figures 25 and 26**).
- disagreed with Council's requested 8:1 planting ratio, stating that it was unreasonable and inconsistent with the approach ordinarily undertaken on similar health projects, however agreed to plant 19 replacement trees on-site and fund the planting of 60 trees off-site (a total of 79 trees) to meet the objectives of this requirement.

At SRtS stage, the Applicant provided advice from Ambulance NSW that the planting of four street trees along the Kareena Road verge would adversely affect lines of sight for ambulances existing the Ambulance Station onto Kareena Road.



**Figure 25 |** Plan of undercroft area, demonstrating the building overhang (red), summer sun angle (peach) and winter sun angle (yellow) (Source: Applicant's RtS).



**Figure 26 |** Section of undercroft area, demonstrating the 54 degree (summer) sun angle and the 24 degree (winter) sun angle (Source: Applicant's RtS).

The NSW Government's draft Greener Places Design Guide 2020 suggests a tree coverage target of 40 per cent in low density areas.

The Department has considered the submissions by Council and EESG, and the information contained within the Applicant's EIS, RtS and SRtS, and is satisfied that the tree removal and replacement as proposed is acceptable. The Department notes that:

- due to the location of trees interspersed throughout the Carpark 3 (the site of the proposed building extension), tree removal to facilitate the development is unavoidable.
- the proposal includes the planting of 19 trees to replace the 15 trees cleared, an increase of four trees.
- while the proposed canopy coverage of 26 per cent is lower than the target suggested in the draft Greener Places Design Guide 2020, it is 10 per cent more than the existing site canopy coverage and represents a net benefit of the proposal overall.

The Department is satisfied that the Applicant has supplied adequate justification for the removal of trees across the site and that the proposed replacement planting within the site can suitably offset the



localised impact of tree removal on site. The Department has recommended a condition requiring the Applicant to develop a final landscape plan prior to the commencement of construction, including a planting schedule and palette comprising species indigenous to the local area.

The Department acknowledges that Council has requested a tree replacement ratio of 8:1 (80 trees, including 20 trees on-site and 60 trees off-site), a figure that appears to have been calculated based upon the clearing of 10 trees as shown on the original landscaping plans. As discussed above, the Applicant confirmed at SRtS stage that the application proposes the removal of 15 trees. Should the 8:1 ratio be calculated based upon the clearing of 15 trees, this would equate to 120 trees rather than 80 as outlined in Council's submission.

While the Applicant initially agreed to Council's request to plant four street trees along the Kareena Road verge, they later advised that this is not possible due to adverse impacts on sightlines from the Ambulance Station driveway. The Department acknowledges this constraint, however, considers that four trees should be planted elsewhere to ensure a greater tree replacement ratio, as requested by Council. Therefore, a condition has been included requiring the Applicant to fund the planting of an additional four trees off-site, beyond the 60 trees proposed. This would result in the planting of a total of 83 replacement trees (19 on-site and 64 off-site).

The Department notes that the planting of 83 replacement trees is lower than the 8:1 tree replacement ratio requested by Council, which would require the planting of 120 replacement trees as outlined above. However, the Department considers that the level replacement landscaping, as conditioned, can suitably offset the removed trees. Therefore, it is not necessary to include a condition requiring a replacement tree planting ratio of 8:1.

Overall, the Department is satisfied that the proposal would result in improved canopy coverage at the Hospital Campus and elsewhere within the LGA. The Department's assessment of the proposed outdoor space and user safety is considered below.

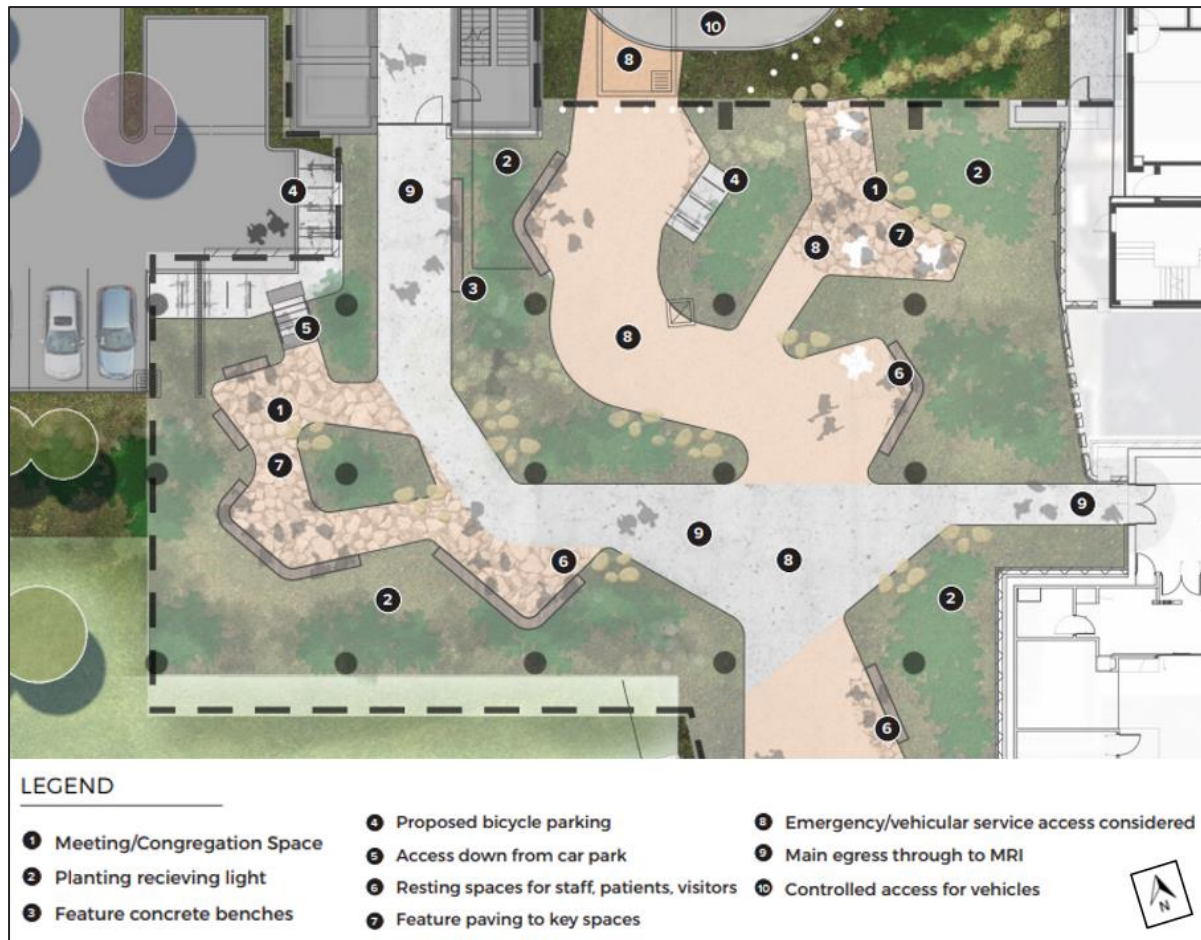
### **Location and design of outdoor space**

In addition to the proposed tree replacement works previously discussed, the application also includes at-grade hard landscaping and outdoor respite areas for patients and staff within the undercroft area, and accessibility improvements for emergency service and maintenance access, egress paths, and the provision of a 1:20 ramp from the carpark to the proposed lifts. Proposed views towards the undercroft are demonstrated in **Figures 14 and 15**. Specifically, within the undercroft area (**Figure 27**) the application proposes:

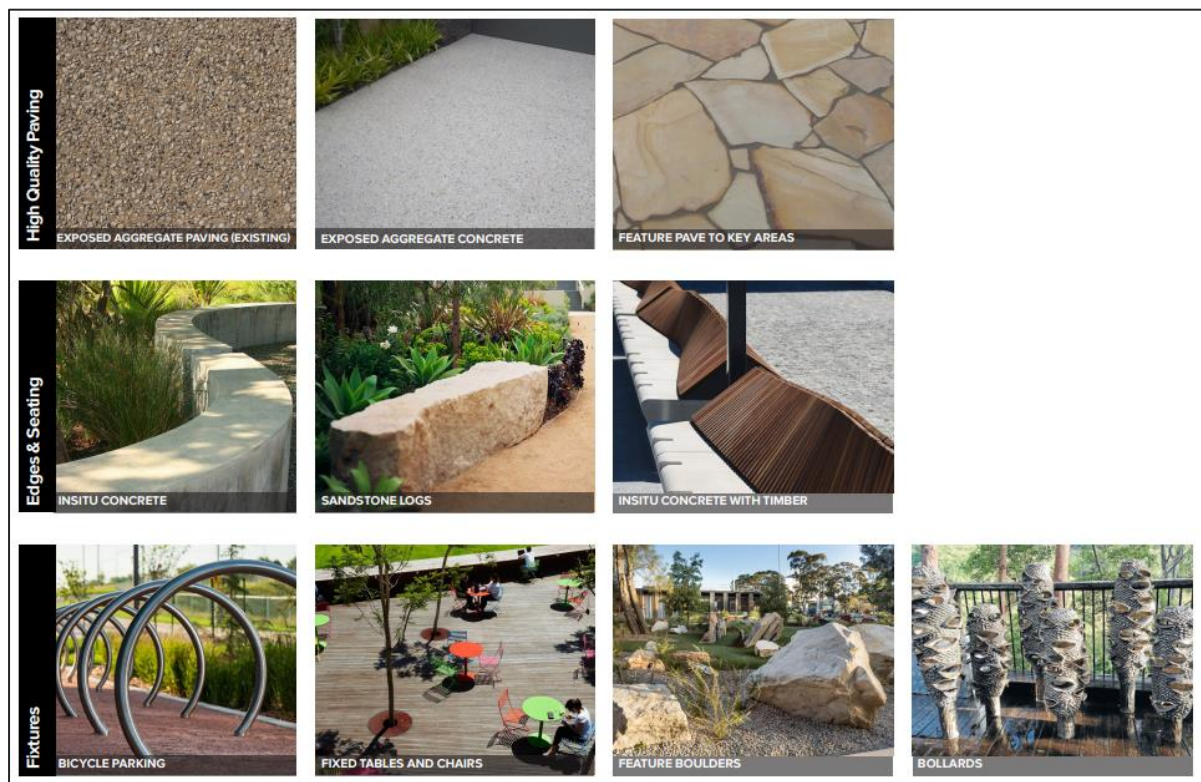
- meeting/congregation spaces.
- resting spaces for staff, patients and visitors.
- controlled access for emergency vehicles.
- bicycle parking.
- native planting.

Proposed materials include (**Figure 28**):

- feature stone and exposed aggregate concrete paving.
- concrete and timber benches and sandstone logs.
- fixed tables and chairs.
- boulders and bollards.



**Figure 27 |** Proposed outdoor space (Source: Applicant's EIS)



**Figure 28 |** Proposed outdoor space materials (Source: Applicant's EIS)

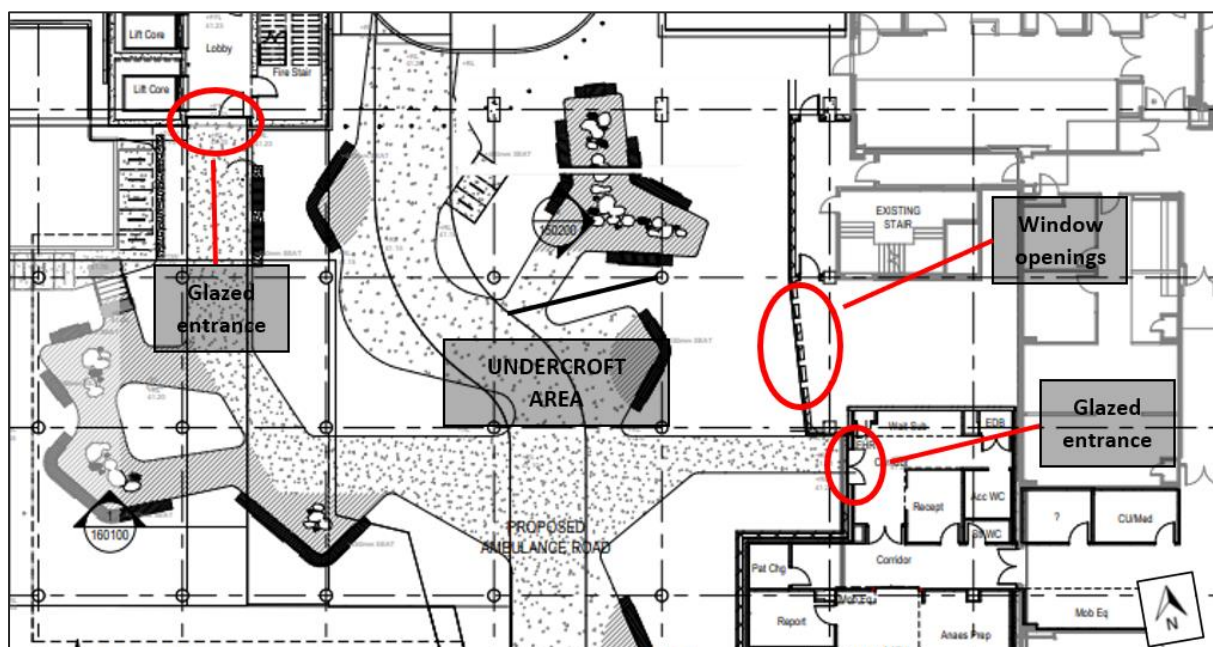
Council raised no concerns regarding the materiality of the proposed outdoor space, but requested that the space is relocated to roof level, as discussed above. The SDRP commended the proposed use of the undercroft as a breakout space, however noted that adequate solar access and natural ventilation must be provided.

The Department has taken into consideration the comments from Council and the SDRP, and the information contained within the Applicant's EIS, RtS and SRtS. The Department acknowledges that proposed outdoor space is constrained, given its location within the undercroft, which is compounded further by the emergency vehicle access requirements. However, the Applicant has provided diagrams and section drawings to demonstrate solar access to the area, and the proposed planting schedule reflects these constraints (as discussed above). The proposed materials are also of a high quality. Overall, Department considers that the proposed outdoor space is capable of providing a high-quality landscape outcome that would make a positive contribution to the character of the area, providing pleasant spaces for users, improving pedestrian and cyclist amenity and environmental outcomes on the site and surrounding area.

### User safety

As discussed in **Section 6.1**, the proposed extension includes limited window openings due to the operational requirements of the development. The building therefore incorporates minimal openings facing into the landscaped area beneath the undercroft (**Figure 29**), limited to:

- a small south-facing glazed entrance at the new lift and stair core.
- a small west-facing glazed entrance at the MRI suite.
- five narrow west-facing window openings in the façade between the existing fire stair and the MRI suite (confirmed at SRtS stage).



**Figure 29** | Casual surveillance opportunities into the proposed undercroft (Source: Applicant's EIS)

Following review of the EIS, the Department raised concern that passive surveillance from the building into the outdoor space would be limited and requested that the Applicant demonstrate how



Crime Prevention Through Environmental Design (CPTED) principles have been applied to the development.

As part of the RtS, the Applicant advised that:

- the undercroft area is not intended for use by the general public – it is intended as a place where staff and escorted patients can take respite.
- on the ground plane and within the undercroft area, surveillance is provided as passive surveillance from the immediate surrounds supported by the use of CCTV.
- the landscaped domain is open to the carpark, with enhanced pedestrian and vehicle links providing constant natural surveillance.
- lighting will be employed to ensure passive surveillance and safety at all hours.
- due to operational requirements, windows cannot be provided from the MRI suite into the undercroft area.
- any window opening from the fire stairs would provide limited opportunities for passive surveillance.

The Department notes that passive surveillance from the upper levels of the proposed extension, including the lift core, would be provided outwards over the carpark to the north and west. CCTV would also be in use. Therefore, no concerns are raised regarding the proposed implementation of CPTED measures for carpark users.

While the Applicant has advised that the area is intended for the use of staff and accompanied patients, it has not been demonstrated how access to the area would be restricted. The Department notes that the area would be open to the carpark, and therefore accessible to the public.

The Department notes that the operational requirements of the building limit the level of passive surveillance possible from internal spaces into the undercroft area. At SRtS stage, the Applicant confirmed that the proposal includes five narrow west-facing windows into the undercroft area. The Department considers that these openings provide an opportunity to increase casual surveillance into the undercroft area which, coupled with surveillance from the carpark and the use of CCTV, would contribute to the safety of users. Overall, the Department considers that the proposed CPTED measures would be acceptable. The proposal would make a positive contribution to the area, providing safe and pleasant outdoor spaces for staff, patients and visitors.

### **6.3 Traffic, transport and access**

The Hospital Campus is located within the Caringbah town centre, which is positioned around the junction of Kingsway and President Avenue and the Caringbah Railway Station (located approximately 750m to the south-east). Vehicle access to the site is provided by:

- Kingsway (westbound only).
- Kareena Road northern driveway (southbound only).
- Kareena Road southern driveway (all directions via roundabout).

Emergency services can enter the site from all access points and internal access within the Hospital Campus is facilitated by an internal ring road. All loading activity occurs via the Kareena Road southern access. Pedestrian and bicycle access is provided adjacent to vehicle access points on Kingsway and Kareena Road.

The application is accompanied by a Transport and Accessibility Impact Assessment (TAIA), a Preliminary Operational Traffic and Access Management Plan (TAMP) and Green Travel Plan (GTP) which consider the existing road and pedestrian connections, predicted construction and operational impacts, transport mode share and sustainable transport measures.

The application proposes to facilitate an overall increase in patient treatment facilities (18 recovery beds and 10 operating/preparation rooms) and will provide employment for 146 full time staff by 2026. The proposal will operate continuously over a 24hr period however, and peak periods are expected to correspond with the existing hospitals peak times of 8am to 9am and 4.30pm to 5.30pm.

Following the exhibition of the EIS, public authorities raised concerns about the construction and operational traffic impacts of the proposal as well as the proposal's sustainable transport initiatives. In response, the Applicant's RtS included updates to the Construction Traffic Management Plan (CTMP) and Green Travel Plan (GTP). The key issues related to traffic and access include:

- mode share and travel plan.
- traffic generation.
- on-site car parking.
- vehicle access and circulation.
- construction traffic and access.

### Mode share and travel plan

A travel survey was undertaken as part of the TAIA to determine travel modes for staff at the Hospital Campus and 163 of the 241 total staff participated. The results of the survey were compared with the 2016 Census' Journey to Work (JTW) data for the Caringbah Statistical Area Level 2 (SA2) region's JTW. The comparison found that staff modal splits are broadly consistent with the SA2 data, with slightly higher trend towards active travel recorded by hospital staff. The results of both surveys are summarised in **Table 6** below.

**Table 6 | Staff travel pattern survey comparison with 2016 JTW data (Source: Applicant's EIS)**

Travel Mode Type	Existing Mode Share (%)	
	Staff travel pattern survey (2020)	Caringbah (SA2) journey to work summary (2016)
Private Vehicle	83.5	88.7
Public Transport	0.5	6.8
Walking	4	3.2
Cycling	6	0.7
Other modes	6	0.35

To reduce the total number of vehicles visiting the hospital, the GTP would promote and encourage the use of public transport by staff and aims to increase numbers of staff using active transport. The GTP sets out a modal split target for staff only and does not propose to provide targeted strategies to



reduced private vehicle usage by visitors. The GTP's approach is based on the understanding that the nature of hospital visitor travel is often in the context of emergency situations, which require the use of private vehicles. The GTP will instead focus on providing information and promoting public transport use as a sustainable travel mode for people visiting inpatients. The GTP recommends adopting the staff mode share targets shown in **Table 7** below.

**Table 7 | GTP recommended target mode-share shifts (Source: Applicant's EIS)**

Travel Mode Type	Travel mode targets (%)		
	Existing	Target Mode Share	Mode Change
Private vehicle (single)	81%	75-78%	3-6% reduction
Private vehicle (carpool)	2-3%	4-6%	2% increase
Public Transport	1-2%	3-4%	2% increase
Active Transport	1-2%	5-10%	1-2% increase

To achieve the target mode-share split, the GTP recommends implementing the following key strategies and transport initiatives:

- provide staff with a Transport Access Guide (TAG), which includes information on active transport routes and facilities near the hospital and has been updated to include reference to the Stage 2 of the Sutherland to Cronulla Active Transport Link (SCATL) (a pedestrian and bicycle path between Sutherland and Cronulla).
- the provision of bicycle storage areas with EOT facilities and the promotion of the benefits of cycling by nominated staff members, including through cycling and health events.
- the provision of Opal card top-up facilities on site.
- ongoing management and review of the GTP, including new travel mode surveys.

Following review of the RtS, TfNSW advised the Applicant that an updated GTP would be required. TfNSW advised that in addition to providing information to staff the GTP would need to include consideration of the adequacy of existing bicycle parking and EOT facilities and include aspirational, achievable and specific mode targets which avoided the use of ranges.

In response to TfNSW's comments, the Applicant:

- clarified the location of the proposed cycle parking and EOT facilities, including references to external transport strategies, pedestrian links to public transport and to revised actions prior, during and post completion.
- clarified the operational requirements of staggered staff start and finish times and suggested that a strategy for staff to avoid peak hours is not required.
- noted that a requirement to implement a staffing strategy could lead to potential conflicts with hospital's operation during peak emergency periods.

TfNSW reviewed the updated GTP and indicated that additional improvements are required, including further development of the proposed sustainable transport initiatives. This requirement was included

as a recommended condition by TfNSW, which also recommended that the GTP include a mechanism to facilitate and assign responsibility for actions in the GTP checklist.

TfNSW did not provide any additional comments regarding the previous recommendation to provide a strategy to stagger staff start and end times.

The Department supports the preparation and implementation of the GTP as a tool to guide mode share targets and encourage sustainable modes of transport. The Department supports TfNSW's recommendations to improve the plan prior to final occupation of the new facilities, including the incorporation of administrative measures to monitor and review the GTP.

The Department considers it important that the Hospital Campus' travel mode share continues to evolve in response to improvements made to active transport infrastructure, such as SCATL Stage 2, and continues to improve over time to further reduce the number of trips made by private vehicles. Consequently, the Department recommends the GTP should be monitored and reviewed annually to assess its efficacy and drive improvements.

The Department considers the provision of bicycle spaces, EOT facilities and the implementation of the GTP will assist in encouraging active transport modes from the outset of the operation of the operating theatre. Over time, with the completion of Stage 2 of the SCATL the GTP would likely further reduce private vehicle use to the site and reduce the pressure on the operation of the surrounding road network.

The Department concludes that the implementation of the proposed behavioural and travel strategies in the site specific GTP, further developed in consultation with TfNSW, would likely achieve the desired mode share and effectively address congestion on the surrounding road network. The Department has recommended conditions requiring the GTP to be revised in consultation with TfNSW, and to include ongoing monitoring and annual review to ensure the GTP improves over time.

### Operational traffic generation

The TAIA includes a survey of the existing traffic conditions on the roads surrounding the site and predicts operational vehicle trip generations based on TfNSW's Guide to Traffic Generating Developments (**Table 8**). Traffic conditions have been calculated based on three phases of operation leading up to the year 2031, using SIDRA network modelling. The traffic modelling rates were calculated as follows, with S being the number of staff during day shift and B is the number of beds at the hospital.

- AM Peak =  $0.41(S) + 0.62(B)$
- PM Peak =  $0.59(S) + 0.05(B)$

**Table 8 | Peak hour vehicle trip generation (Source: Applicant's EIS)**

	Project Phases			
	Current	Transition (2022)	Phase 1 (2023-26)	Phase 2 2026-31)
<b>Current Staff</b>	221	260	345	404
<b>Staff increase</b>	-	39	124	183

<b>No. Beds</b>	13	17	17	18
<b>AM peak trips</b>	99	117	152	177
<b>PM peak trips</b>	143	171	221	256
<b>AM additional trips</b>	-	18	53	78
<b>PM additional trips</b>	-	28	78	113

The TAIA also includes an assessment of the performance of three signalised intersections around the site at the transition, Phase 1 and Phase 2 scenarios at:

- Kingsway/Port Hacking Road/Kareena Road.
- Kareena Road/southern access road.
- Kareena Road/northern access road.

Intersection modelling has been undertaken for the year 2023 (opening year) and 2030 (horizon year when Phase 2 of staffing and number of beds will be completely operational) assuming 10 years of traffic growth beyond the current 2020 conditions. The scenarios have been modelled in **Table 9** below.

**Table 4 |** Intersection performance Level of Service (LoS) (Base source: Applicant's EIS)

Intersection	Existing		Phase 1 (2023)		Phase 1 (2023+ Dev)		Phase 2 (2030)		Phase 2 (2030+ Dev)	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
<b>Kingsway / Port Hacking Road / Kareena Road</b>	C	C	C	D	C	D	C	D	C	D
<b>Kareena Road / southern access road</b>	A	B	A	B	A	B	A	B	A	A
<b>Kareena Road / northern access road</b>	-	-	A	A	A	A	A	A	A	A

The post development traffic assessment found that the development would have a minor impact on surrounding traffic, with no major additional queueing or delays expected. TfNSW did not raise concerns with the projected increase or with the Applicant's LoS modelling and baseline data set assumptions.

The assessment found that the Kingsway/ Port Hacking/ Kareena Road intersection, in the year 2023 (Opening Year) and 2030 (Horizon Year) would continue to operate at satisfactory levels. The

southern approach from Kareena Road was found to experience an increase in queue length (20 metres) and delays of up three seconds during the PM peak but would still provide the same level of service (LOS C).

The northern access to the hospital from Kareena Road is expected to become operational prior to 2023 and post development assessment showed no significant queuing or delays. The assessment assumes that after the completion of the right turn lane at the Kareena Road/northern access, approximately 50 per cent of the northbound traffic on Kareena Road associated with the hospital is likely to shift to the northern access road by 2030, improving the performance of the roundabout at the Kareena road/southern access.

Based on this assumption, the 2030+ development assessment is shown to contribute to a minor improvement at the Kareena Road/ southern access intersection from LOS B to LOS A. The assessment found that the anticipated increase in traffic by the year 2030 would result in a minor queue increase of 15 metres at the eastern approach during the PM peak. However, the queue increase would occur within the hospital boundary and was therefore not predicted to effect external traffic conditions resulting in an overall improvement in the intersections performance.

The Department concludes that the traffic generated by the development is acceptable and, subject to the conditions and the implementation of a revised GTP developed in consultation TfNSW, the traffic impacts of the proposal can be managed and mitigated over time. Furthermore, as the GTP applies to the broader hospital Campus (not just the proposed development), there is the potential that vehicle movements to/from the Hospital Campus would be reduced further in the future.

### **Car parking**

The Hospital Campus currently provides 950 formal parking spaces, dispersed throughout the site at five parking locations including at-grade car parks, the fleet carpark, multi-storey and parking on the hospital's internal roads. Of these spaces, 873 are available for staff and visitors with the remaining spaces dedicated for the operation of allied health services within the campus. The Applicant has undertaken an on-street parking survey and has found that there are approximately 150 parking spaces within a 300 radius of the hospital.

The proposed extension to the South Wing building would be built over Carpark 3, resulting in the removal of 12 at-grade car parking spaces and reducing the overall parking available to staff and visitors to 861 spaces (down from 873 spaces).

As outlined previously, the Applicant has applied TfNSW's Guide to Traffic Generating Developments to determine the future planning demand and corresponding on-site parking requirement associated with the development. However, the Hospital Campus is located within the Caringbah Medical Precinct and the Sutherland Shire Development Control Plan 2015 (SDCP) prescribes an overall requirement of 1 car space per 35sqm of GFA.

The proposal is an extension of an existing hospital facility and the Applicant conducted an analysis of the adequacy of parking provisions rather than the provision of a specific number of spaces. Following the exhibition of the EIS, Council did not object to the proposed loss of car parking spaces or request the provision of additional spaces in line with the SDCP requirements, however, did raise concern that the loss of 12 on-site parking spaces may see additional pressure placed on the parking demand on surrounding streets.

To determine existing demand for car parking a demand survey was undertaken on 23 July 2020 between 6am and 6pm. To determine demand prior to COVID conditions at the hospital, a demand survey (**Table 10**) was compared with car park boom gate entry data from Thursday 7 November 2019 (**Table 11**). The result of the boom gate data did not include the additional 20 off-street parking spaces within the hospital campus precinct which were included in the 2020 survey and are not within the gated parking areas.

**Table 10 | Existing off-street parking demand (2020 survey) (Source: Applicant's EIS)**

	Parking Type					
	General	Disabled	Staff only	Special uses	Motor bike	Total campus occupancy
Occupied at peak (%)	87	42	80	33	36	84
Occupied at Peak (No.)	611	8	107	3	4	733
Vacant at peak (No.)	89	11	27	6	7	140

**Table 11 | Off-street parking demand (2019 boom gate survey) (Source: Applicant's EIS)**

	Car Park No.					
	1	2	3	5	6	Total occupancy
Occupied at peak (%)	100	79	98	87	64	84
Occupied at Peak (No.)	50	46	43	490	89	718
Supply	50	58	44	562	139	853

The result of the surveys found that peak demand occurred at 11am with 84 per cent occupancy (733 of 873 spaces occupied). The 2019 survey of boom gate entry and exit data also showed that peak demand occurred at 11am with 84 per cent occupancy (718 of 853 spaces occupied). No data was provided for the 20 car spaces located outside the boom gate-controlled areas which were included in the 2020 survey.

Both the 2020 and 2019 data sets show a similar occupancy trend with the 2020 data set showing a higher level (10 additional vehicles) of parking demand, which has been attributed to reduced public transport capacity (due to COVID restrictions affecting travel mode). Based on this assumption, the Applicant has provided the 2019 boom gate data as the relevant baseline for current demand.

To validate the results from the boom gate survey, the entry and exit data was compared with the staff journey to work survey (**Table 7**) staff numbers during busy shifts (47 per cent of total staff on site) and the predicted future demand additional health services (**Table 8**). The demand for the car



parking during the transition phase, which includes the temporary removal of 25 spaces during the construction of the proposal, was also taken into consideration. The increased demand generated by the proposed development is shown in **Table 12**.

**Table 12 | Increased parking demand generated by the development (Source: Applicant's EIS 2021)**

	Daily Demand (Development Year)			
	Existing	Transition	Phase 1	Phase 2
Staff	87	102	135	158
Visitors	12	17	17	19
<b>Demand increase</b>	<b>-</b>	<b>+20</b>	<b>+54</b>	<b>+79</b>

The result of the survey (based on vehicle usage of 83.5 per cent for staff and 100 per cent for visitors) and daily demand profile for each phase scenario (Existing, Transition, Phase 1 and Phase 2) is shown below (**Table 13**). The demand for the transition phase also takes into account the temporary removal of 25 spaces during the construction of the proposal.

The Department notes that the data for the 2019 boom gate survey did not differentiate between motorcycle and car entries and did not reduce the total car parking supply by the number of motorcycle parking spaces. To account for this, the Department has reduced the total supply of parking (**Table 13**) by the number of existing motorcycle spaces.

The 20 car parking spaces located outside the boom gate parking areas were not included in the final supply and the Department has assumed that:

- the remaining spaces are not available at any time.
- the baseline data of the 2019 represents a worst-case scenario.

Based on the Department's worst case scenario and the daily car parking provision and demand, the TAIA demonstrates that the existing car park provision is sufficient to meet future demand and demand during construction phases, with a surplus of parking spaces through all phases of the development and a final margin of 33 surplus parking spaces in 2031.

**Table 5 | Hospital Campus - daily car parking provision and demand (Source: Applicant's EIS 2021)**

	Daily Demand (Development Year)			
	Existing	Transition (2022)	Phase 1 (2023/26)	Phase 2 (2026/31)
Supply	853	816	841	841
Demand	718	738	772	797
Motorcycle spaces	-11	-11	-11	-11

<b>Surplus parking spaces</b>	<b>+124</b>	<b>+67</b>	<b>+58</b>	<b>+33</b>
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The TAIA therefore demonstrates that proposed parking provision would meet demand in the years 2022 and 2031, based on current travel mode share data and assuming no change in current travel behaviour. As discussed above, the Department notes that the application is accompanied by a GTP, which is expected to reduce private vehicle usage and parking demand, and therefore delivering a higher parking surplus in the year 2031 than demonstrated in the TAIA. No additional concerns were raised by Council with regard to car parking capacity at RtS stage.

The Department considers the proposed on-site car parking provision is acceptable, noting that:

- the survey-based parking assessment undertaken as part of the TAIA has rationalised its baseline data source.
- the predicted future parking provision based on a worst case scenario exceeds demand, providing a safety margin of 67 spaces in 2023 and ultimately 33 spaces in 2031.

Given the above, the Department is satisfied that the proposal would provide for adequate parking in the transition, 2023 and 2030 future scenarios. The loss of 12 car parking spaces and the projected future demand in conjunction with the Department's worst case scenario demonstrate that the hospital campus would continue to provide a surplus of off-street parking spaces. The Department concludes the proposal would not have a detrimental impact on the locality in terms of demand for on-street car parking spaces.

### **Construction traffic**

The EIS includes a preliminary Construction Traffic and Pedestrian Management Plan (CTPMP) which details construction vehicle movements, routes of travel, parking and access arrangements, pedestrian management and measures to address potential impacts. The Applicant has outlined that a detailed CTPMP will be required prior to the commencement of construction activities as the final CTPMP cannot be developed until all final design selections have been developed. The Applicant's preliminary CTPMP is therefore intended to provide a framework within which a future CTPMP can be developed and implemented. The preliminary CTPMP recommends:

- submission and completion of a final CTPMP as a condition of consent prior to any construction works.
- completion of a Traffic Controls Plan prior to construction.
- restrictions on street parking for construction vehicles.
- community notification prior to the commencement of construction activities.

Following review of the EIS, neither Council or TfNSW have raised any concerns with the framework, recommendations, mitigation measures or management strategies proposed by the preliminary CTPMP. However, TfNSW requested that details of the largest/longest vehicles accessing the site and a swept path analysis for these vehicles be included in the CTPMP. In response, the Applicant submitted a revised CTPMP which included a Swept Path Analysis for a 12.5m Heavy Rigid Vehicle and demonstrated sufficient clearance for a vehicle of this size entering the site. TfNSW did not raise any further concerns.

Based on the above assessment, the Department has recommended a condition requiring the implementation of a final CTPMP to ensure that recommended management measures are implemented during construction.

## 6.4 Other issues

The Department has considered other issues in **Table 14**.

**Table 14 | Other assessment issues**

Issue	Findings	Recommendations
<b>Noise and vibration</b>	<p>A Noise &amp; Impact Vibration Assessment (NVIA) accompanied the EIS. The NVIA established background noise conditions from short and long-term monitoring and Project Noise Trigger Levels (PNTL) for the nearest noise sensitive residential receivers during the construction and operational phases.</p> <p><u>Construction phase:</u> except for a marginal exceedance for jack hammer works (at the nearest residential receiver), excavation, structural and fit-out works are not predicted to exceed the highly affected noise criteria of 75 dBA at the nearest residential receiver with no acoustic screening.</p> <p>Therefore, the NVIA recommends that a Construction Noise and Vibration Management Plan (CNVMP) is required to manage impacts and is to include:</p> <ul style="list-style-type: none"> <li>• work practices that will reduce noise and vibration at the source.</li> <li>• on-site noise management (e.g. regular inspection, strategically locating plant and equipment away from receivers, low impact equipment selection).</li> <li>• work scheduling to periods where people are least affected by noise (e.g. providing respite periods, scheduling during periods of high neighbourhood noise, optimising deliveries by amalgamating loads where possible, including contract conditions which specify penalties for non-compliance).</li> <li>• consultation and ongoing noise monitoring.</li> </ul> <p><u>Operational phase:</u> noise emission from the proposed rooftop mechanical plant is expected to meet the required PTNL and additional noise controls are recommended address cumulative noise impacts prior to construction.</p> <p>Additional traffic generated is expected to meet the NSW Road Noise Policy (RNP) criteria for an insignificant increase in noise levels as it would result in an increase of less than 2dBA.</p>	<p>The Department acknowledges that both the construction and operation of the development would generate some level of noise. However, the Department considers that the noise generated by the proposal is acceptable overall.</p> <p>The Department notes that the development is predicted to meet the PNTLs in all instances, except for a marginal exceedance during jackhammer construction works. The NVIA recommends that a detailed Construction Noise and Vibration Management Plan is prepared prior to construction to further detail any required mitigation measures.</p> <p>The Department considers that the glazing systems, as recommended by the NVIA, would sufficiently address noise intrusion from Kingsway and Kareena Road.</p> <p>The Department has included a condition requiring that the NVIA noise management and mitigation measures be implemented and adhered to.</p> <p>To address the predicted exceedance of the highly affected noise criteria at nearby residential receivers, the Department has included a condition requiring the Applicant to prepare a Construction Noise and Vibration Management Sub-</p>

	<p>The predicted noise level for the mechanical roof top plant at one metre distance is 87dBA. However, barrier attenuation and distance to receivers would reduce the plant's dBA to below level below the PTNL at receiver boundaries.</p> <p><u>Noise intrusion</u> into the proposed operating theatre would be generated by the Kingsway Road. The T4 Cronulla rail corridor is 160m away from the southern façade of the theatre and a detailed noise and vibration assessment is not required.</p> <p>The Kingsway and Kareena Road are expected to generate a noise level of 59dBA and 58dBA respectively for wards and other hospital areas. This exceeds the required Interior Design Noise Level</p> <p>for the wards (35dBA) and other noise sensitive areas (45dBA).</p> <p>To mitigate the effects of the exceedance and meet the required dBA, a fix glazing system is recommended and would provide a weighted sound reduction index (Rw) of 32 for the wards and 30 for other ward areas. The NVIA recommends the use of 6.38mm laminated fixed single glazing system or a 6mm : 12mm air gap : 10mm fixed double glazing system to meet the project Rw.</p>	<p>Plan as part of a Construction Environmental Management Plan (CEMP).</p>
<b>Stormwater management and flooding</b>	<p>A Civil Engineering (CE) report accompanied the EIS and addressed the SDCP 2015 requirements to provide for peak flow for flood events up to and including a 1% Annual Exceedance Probability (AEP) and to ensure that storm water runoff does not exceed to the site's undeveloped runoff rate.</p> <p>The proposal includes a 43 cubic metre on-site detention (OSD) tank, designed for flow above the 5% AEP up to and including 1% AEP. The proposed drainage system is designed as per Council's stormwater design requirements, Australian Rainfall and Runoff (2019), Managing Urban Stormwater: Soils and Construction – Volume 1, 4<sup>th</sup> Edition (Landcom, 2004) and Australian Standard AS3500.3 Plumbing and Drainage: Stormwater Drainage.</p> <p>DRAINS modelling has been applied with an 8.5% multiplier to account for increase rainfall due to climate change.</p> <p>Surcharging of the OSD tank is only anticipated if there is a blockage within the downstream system, or there is a storm event larger than the 1% AEP. No drainage infrastructure will be handed over to Council.</p> <p>The CE report also addressed the SDCP Flood Risk Management Map. The site is not located in</p>	<p>The Department considers that the proposed stormwater provisions would be sufficient for the proposed development.</p> <p>The Department has recommended conditions requiring the development comply with the stormwater design, relevant Australian Standards and industry best practice guidance.</p> <p>The Department has recommended a condition requiring the Applicant submit a certified WAED to Council prior to commencement of operation.</p> <p>The Department agrees with the conclusions of the CE report that no additional conditions or amendments are necessary with regard to flooding.</p>

a flood risk zone or subject to external flooding. It is not within a nominated flood planning area, and therefore no additional flood mitigation measures are required.

Council raised no objections to the stormwater management proposed, however requested conditions to ensure the system is constructed in accordance with Council specifications, and that a certified Works-as-Executed drawing (WAED) is submitted to Council prior to the commencement of operation.

## Contamination

An Environmental Site Assessment (ESA) and Remediation Action Plan (RAP) accompanied the EIS. The ESA assessed the potential for site contamination and has concluded that historic fill imported to the site is a source of contamination that requires remediation.

The ESA states that as the site is largely paved, there are no complete source-pathway-receptors linkages to any identified sources of contamination.

The ESA identified Polycyclic Aromatic Hydrocarbons contaminants in soil and Asbestos Containing Material/Protentional Asbestos Containing Material (ACMs/PACMs) which are likely to be disturbed as part of the proposed works.

The ESA considered that the site can be made suitable for the development subject to:

- preparation of a remediation action plan (RAP) with data gap assessment and unexpected find protocol.
- a validation assessment.
- preparation of a hazardous material survey prior to the commencement of any works
- removal of ACMs/PACMs by a licenced contractor, in accordance with the Safe Work NSW Code of Practice.

In response to the recommendations of the ESA, the RAP includes requirements to complete a data gap investigation, confirm the extent of remediation and proposes the following options for the Remedial Works Plan (RWP):

- cap and contain and management.
- excavation and off-site disposal.

The RAP recommends that a validation report is prepared on completion of remediation, and that an Environmental Management Plan (EMP) is prepared for areas where contaminated soil is capped to ensure that risks remain low and acceptable.

The Department is satisfied that the Applicant has adequately addressed clause 7 of SEPP 55 and that the site is suitable for the proposed development subject to the implementation of the recommendations of the ESA.

The Department has included a condition(s) requiring that the recommendations of the ESA and RAP are adhered to.

The Department has included a condition requiring the Applicant conduct site investigations to confirm the full nature and extent of contamination and remediation, as recommended by the RAP.



<b>Bicycle parking and EOT facilities</b>	<p>The proposal includes an additional 11 secure bicycle parking spaces (bicycle rails) within the undercroft area, and EOT facilities at Level 3 of the refurbished South Wing building including change rooms and showers (two male and two female).</p> <p>The Department notes the SDCP 2015 requires the provision of 1 bicycle parking space per 10 car parking spaces for first 200 car spaces, then 1 space per 20 parking spaces thereafter.</p> <p>The EIS outlines that the development will result in a net loss of 12 car parking spaces and is consistent with the SDCP 2015 cycle parking standards. Council has raised no concerns with the level of bicycle parking proposed. Following review of the RtS, TfNSW raised no concerns regarding the proposed bicycle parking or EOT facilities, however did recommend that the Applicant further develops the GTP to include aspirational, achievable and specific mode share targets for achieving a mode shift to active transport (as discussed in <b>Section 6.3</b>).</p>	<p>The Department supports the proposed bicycle parking and EOT facilities, noting:</p> <ul style="list-style-type: none"> <li>• they form part of the sustainable transport measures facilitating the mode share shift away from private car use.</li> <li>• the proposal provides 11 bicycle parking spaces required by the SDCP 2015.</li> <li>• EOT facilities are adequate and conveniently located to the secure bicycle parking area.</li> </ul> <p>The Department has included a condition requiring the provision of the bicycle parking and EOT facilities to be consistent with requirements of the GTP.</p>
<b>Signage and wayfinding</b>	<p><u>Signage:</u> the application proposes five external signage panels comprised of:</p> <ul style="list-style-type: none"> <li>• one door-width, Diabond Traffic Black entry identification sign mounted above the building entry point, with white vinyl graphics.</li> <li>• three wall-mounted 365mm x 725mm Diabond Traffic Black external entry notice wayfinding signs.</li> <li>• one backlit hospital crest roundel sign 5375mm x 1920mm x 150 mounted at the Level 4 western elevation, finished in gloss white with laser cut lettering and aluminium hospital logo.</li> </ul> <p>The external signage is fit for purpose and has been assessed against the requirements of SEPP 64 (refer <b>Appendix B</b>).</p> <p><u>Wayfinding:</u> following review of the EIS, both the Department and Council raised concern that the scale of the proposed new building would adversely impact patient wayfinding across the hospital site. The Applicant therefore submitted a wayfinding strategy which includes internal signage for the new building and refurbishment. The signage is consistent with existing signage, would not result in visual clutter and would facilitate patient and worker navigation.</p>	<p>The Department considers the proposed signage to be appropriate in terms of its location, dimensions and proposed illumination. The signage would not result in an adverse glare or disturbance to the surrounding area.</p> <p>The Department is satisfied that the wayfinding strategy demonstrates that the proposal would not adversely affect the ease of wayfinding across the Hospital Campus.</p> <p>The Department has included conditions requiring signage illumination to be in accordance with the relevant Australian Standards and directed away from any adjacent residential properties.</p>
<b>Aboriginal Cultural Heritage</b>	<p>The application includes an Aboriginal Cultural Heritage Assessment Report (ACHAR), which incorporates an archaeological field survey and archaeological test excavations to determine the</p>	<p>The Department agrees with the conclusions of the ACHAR and the advice provided by HNSW ACH.</p>

	<p>site's potential to contain Aboriginal archaeological remains.</p> <p>The ACHAR identifies that the proposal will have limited subsurface impact and is located within an area previously mapped as having low archaeological potential. During consultation with the Registered Aboriginal Parties, no specific cultural values directly related to the proposal area were identified.</p> <p>The ACAR recommends that no additional Archaeological investigation or monitoring is required, and an unexpected finds policy should be implemented.</p> <p>Heritage NSW supports the ACHAR's recommendations and notes that the requirement for an Unexpected Finds Protocol (UFP) and must be in place prior to and throughout the proposed works.</p>	<p>The Department has included the Aboriginal archaeological conditions recommended by the ACHAR and by HNSW ACH.</p>
<b>Archaeological heritage</b>	<p>The EIS was accompanied by a Statement of Heritage Impact (SHI), which determines the potential heritage impact of the proposal.</p> <p>The SHI states that the development site is not a heritage item, however notes that the broader hospital precinct contains a legacy Department of Health s170 heritage inventory listing for the (former) main hospital building (demolished 2003-2004). The SHI confirms the site does not contain heritage significance.</p> <p>The SHI concludes that there are no heritage items in the vicinity and that there are unlikely to be any significant archaeological remains impacted by the proposal. The SHI recommends including provisions for unexpected finds.</p>	<p>The Department agrees with the conclusions of the SHI and has included a condition requiring the preparation of an unexpected finds protocol.</p>
<b>Development contributions</b>	<p>Council's Section 7.12 Development Contribution Plan 2020 applies to development within the LGA. The purpose of the Plan is to provide payments for the provision of new public facilities and does not specifically exclude health facilities from the payment of levies.</p> <p>The Applicant seeks an exemption from the Contributions Plan stating that as the proposed development relates to social infrastructure provided by a public authority and it should not be subject to the levying of contributions. Council did not raise any concerns with this approach.</p>	<p>The Department notes that the provision of new health facilities is a significant public benefit.</p> <p>Noting the purpose of the Contributions Plan, the Department considers that the proposed development does not require the payment of a development contributions under section 7.12 of the EP&amp;A Act.</p> <p>No additional conditions or amendments are necessary.</p>
<b>Environmental amenity</b>	<p>The closest residential properties to the proposal are located approximately 44 metres west of the</p>	<p>Given the distance between the South Wing building extension and neighbouring residential properties and</p>

	<p>completed development, on the opposite side of Kareena Road.</p> <p>The form and scale of the theatre building is consistent with the existing character of development within the broader hospital site.</p> <p>No objections were received from the public regarding the proposed development.</p>	<p>considering the scale of development proposed, the Department considers that the proposal would not have an adverse impact on residential amenity in terms of overshadowing, overlooking, loss of private views or noise disturbance.</p> <p>No additional conditions or amendments are necessary.</p>
<b>Hazardous materials</b>	<p>The proposal includes the storage of cryogenic/liquid oxygen storage tanks and compressed oxygen cylinders which exceeds the screening threshold of <i>State Environmental Planning Policy No 33 – Hazardous and Offensive Development</i> (SEPP 33). A Preliminary Hazard Analysis (PHA) was therefore undertaken.</p> <p>The PHA has been prepared generally in accordance with the Department's guidelines Hazardous Industry Planning Advisory Paper No.6: Hazards Analysis (2011) and Multi-Level Risk Assessment (2010). The PHA adopts a Level 1 qualitative risk analysis and demonstrates that Sutherland Hospital meets all the relevant risk criteria.</p> <p>The dangerous goods quantities reported in the PHA are associated with both the existing hospital and the proposed development. The Applicant clarified that the proposed development does not include storage of dangerous goods that exceed the threshold quantities in outlined in the Department's guidelines Applying SEPP 33 (2011). Further, the proposal does not modify the existing storage quantities of dangerous goods or relocate the associated storage location.</p>	<p>The Department notes that the proposal does not include the storage of dangerous goods that exceed threshold quantities, nor does it modify the existing storage quantities or relocated the storage location. Therefore, the application does not trigger SEPP 33 and the Department notes that it did not require a PHA.</p> <p>The Department has included conditions regarding the storage and transportation of dangerous goods.</p>

## 7 Evaluation

The Department has reviewed the EIS, RtS and SRtS and assessed the merits of the proposal, taking into consideration advice from the public authorities. Issues raised in submissions have been considered and all environmental issues associated with the proposal have been assessed.

The Department considers that the proposal should be approved as it would provide benefit for the community by delivering improved and expanded healthcare facilities, and is also predicted to generate 377 construction jobs and 146 full-time equivalent jobs during operation. Overall, the Department concludes the impacts of the development are acceptable and can be appropriately managed or mitigated through the implementation of recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved, subject to conditions.

The Department considers the key issues raised to be built form and design, landscaping and outdoor space, and traffic, transport and access.

The height and bulk of the South Wing building extension responds to the site and the existing height of buildings within the Hospital Campus, and the design of the façade, including materiality, ensure that the extension would make a positive contribution to the streetscape and is acceptable.

The proposal demonstrated that the removal of 15 trees is unavoidable and justified in this instance. In addition, the Department concluded, subject to conditions regarding tree retention, replacement and protection, the overall proposal's biodiversity and tree strategy for the site is acceptable. Subject to recommended conditions, the proposed landscaping is of a high quality, providing a pleasant and safe space for users, improving pedestrian and cyclist amenity and environmental outcomes on the site and surrounding area.

Overall, the proposal would not have a significant adverse impact on the local traffic network or surrounding key intersections. The Applicant has demonstrated that the proposed travel mode share is attainable subject to the implementation of the recommended sustainable transport measures and the Department's conditions of consent.

The proposal demonstrated that proposed parking provision would meet demand, and the Department notes that the mode share shift away from private car use, and subject to the Green Travel Plan, has potential to further reduce private vehicle usage and parking demand in the future.

The operation of the refurbished and expanded healthcare facilities would have minimal operational noise impacts on surrounding sensitive receivers. The Department has recommended operational noise conditions requiring the Applicant's noise management and mitigation measures be implemented. The proposal would not have any substantial impacts in terms of overshadowing, overlooking or loss of views.

The Department considers that the hours of construction are acceptable. The proposal includes appropriate management and mitigation measures that would ensure construction impacts on surrounding properties and the Hospital Campus are minimised.



## 8 Recommendation

It is recommended that the Director, Social and Infrastructure Assessments, as delegate of the Minister for Planning and Public Spaces:

- **considers** the findings and recommendations of this report.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant consent to the application.
- **agrees** with the key reasons for approval listed in the notice of decision.
- **grants consent** for the application in respect of The Sutherland Hospital Operating Theatre Upgrade (SSD-11099584), subject to the conditions in the attached development consent.
- **signs** the attached development consent and recommended conditions of consent (**Appendix C**).

**Recommended by:**



**Isaac Clayton**  
Planning Officer  
Social Infrastructure

**Recommended by:**



**Nathan Stringer**  
Senior Planning Officer  
Social Infrastructure

**Recommended by:**



**David Gibson**  
Team Leader  
Social Infrastructure

## 9 Determination

The recommendation is **adopted** by:



12 October 2021

**Karen Harragon**

Director

Social and Infrastructure Assessments

# Appendices

## Appendix A – List of referenced documents

### 1. Environmental Assessment

<https://www.planningportal.nsw.gov.au/major-projects/project/791341>

### 2. Submissions

<https://www.planningportal.nsw.gov.au/major-projects/project/791341>

### 3. Response to Submissions

<https://www.planningportal.nsw.gov.au/major-projects/project/791341>

### 4. Additional Information and Supplementary Response to Submissions

<https://www.planningportal.nsw.gov.au/major-projects/project/791341>

## Appendix B – Statutory Consideration

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the Environmental Planning Instruments (EPIs) that govern the carrying out of the project and have been taken into consideration in the Department's environmental assessment.

Controls considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP).
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP).
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55).
- Draft State Environmental Planning Policy (Remediation of Land).
- State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64).
- Sutherland Shire Local Environmental Plan 2015 (SLEP).

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

**Table B1** | SRD SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
<b>3 Aims of Policy</b> The aims of this Policy are as follows: (a) to identify development that is State significant development	The proposed development is identified as SSD.	Yes
<b>8 Declaration of State significant development: section 4.36</b> (1) Development is declared to be State significant development for the purposes of the Act if: (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and (b) the development is specified in Schedule 1 or 2.	The proposed development is permissible with development consent. The development is a type specified in Schedule 1.	Yes
<b>Schedule 1 State significant development—general</b> <b>14 Hospitals, medical centres and health research facilities</b> 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	The proposed development comprises development for the purpose of a hospital and has a CIV in excess of \$30 million.	Yes



local health district board, a University or an independent medical research institute).

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### **State Environmental Planning Policy (Infrastructure) 2007**

The Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

The proposal is categorised as 'health services facilities'. The site is zoned SP1 Special Activities, defined as a 'prescribed zone' in clause 56 of the Infrastructure SEPP and therefore the development is permissible with consent under clause 57(1).

The proposed development is located within the vicinity of an electricity transmission or distribution network. In accordance with the Infrastructure SEPP, the development was referred to Ausgrid for comment in accordance with clause 45. No response was received. The Department considers no additional conditions or amendments are necessary.

### **Environmental Planning Policy No. 55 – Remediation of Land**

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application.

As detailed at **Section 6.4**, the Department is satisfied that the Applicant has adequately demonstrated that the site is suitable for use as a hospital as required by SEPP 55.

### **Draft State Environmental Planning Policy (Remediation of Land)**

The Department is reviewing all State Environmental Planning Policies to ensure they remain effective and relevant and SEPP 55 has been reviewed as part of that program. The Department has published the draft Remediation of Land State Environmental Planning Policy (Remediation SEPP), which was exhibited until April 2018.

Once adopted, the Remediation SEPP will retain elements of SEPP 55, and add the following provisions to establish a modern approach to the management of contaminated land:

- require all remediation work that is to be carried out without development consent, to be reviewed and certified by a certified contaminated land consultant.
- categorise remediation work based on the scale, risk and complexity of the work.
- require environmental management plans relating to post-remediation management or ongoing management of on site to be provided to Council.

The new SEPP will not include any strategic planning objectives or provisions. Strategic planning matters will instead be dealt with through a direction under Section 117 of the EP&A Act.

As detailed at **Section 6.4**, the Department is satisfied that the Applicant has adequately demonstrated that the site is suitable for use as a hospital as required by SEPP 55.

## Environmental Planning Policy No. 64 – Advertising and Signage

SEPP 65 applies to all signage that under an EPI can be displayed with or without development consent and is visible from any public space or public reserve.

The development includes the provision of five signs. Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the proposal is consistent with the objectives of the SEPP and with assessment criteria that are contained in Schedule 1. The Department has considered the proposal against SEPP 64 assessment criteria at **Table B2**.

**Table B2** | SEPP 64 compliance table

Assessment Criteria	Department's Consideration	Complies
<b>1 Character of the area</b>		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The proposal is compatible with the existing character of the area and is not expected to have any adverse impacts.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	There are no relevant themes for outdoor advertising in the area.	Yes
<b>2 Special areas</b>		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The site is not located within an environmentally sensitive areas and does not contain a heritage item. The signs would not detract from the amenity or visual quality of the surrounding area.	Yes
<b>3 Views and vistas</b>		
Does the proposal obscure or compromise important views?	The signs are attached to the hospital building and set within the proposed landscaped areas. The proposal would not obscure or compromise any important views.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?	The signs would not dominate the skyline or reduce the quality of vistas.	Yes
Does the proposal respect the viewing rights of other advertisers?	The signs are not proposed in proximity to any other advertisements and would therefore not impact on the viewing rights of other advertisers.	Yes
<b>4 Streetscape, setting or landscape</b>		

Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The signs are modest for the size of the site and would not detract from the character of the streetscape or setting.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposed signs would be of a high quality and would complement the built form.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The signs are simple in design and would not result in visual clutter.	Not applicable.
Does the proposal screen unsightliness?	Not applicable.	Not applicable.
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The signs would not protrude above any buildings, structures or tree canopies.	Yes
Does the proposal require ongoing vegetation management?	No ongoing vegetation management is needed.	Yes
<b>5 Site and building</b>		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The signs are compatible with the scale and proportion of the proposed development.	Yes
Does the proposal respect important features of the site or building, or both?	The proposed size of the signs is modest and respect the design of the building and wider Hospital Campus.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The purpose of the signs is to identify the site/building and assist with wayfinding. The signs are visually interesting.	Yes
<b>6 Associated devices and logos with advertisements and advertising structures</b>		
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	Lighting and logos are designed as an integral part of the signage.	Yes
<b>7 Illumination</b>		
Would illumination result in unacceptable glare?	The hospital identification sign attached to the building fronting Kareena Road would be back-lit. The lighting would be managed to ensure there will be no adverse impacts on nearby sensitive receivers.	Yes
Would illumination affect safety for pedestrians, vehicles or aircraft?		

Would illumination distract from the amenity of any residence or other form of accommodation?	No.	Yes
Can the intensity of the illumination be adjusted, if necessary?	Yes.	Yes
Is the illumination subject to a curfew?	No. The Department does not consider a curfew is necessary given the back-lighting of the hospital identification signage would not have adverse amenity impacts.	Yes

## 8 Safety

Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The signage is located wholly within the site and would not reduce safety or obscure sightlines from public areas.	Yes
Would the proposal reduce safety for any public road?	The proposed signage is set back from the roadway and would not reduce road safety.	Yes

## Sutherland Shire Local Environmental Plan (SLEP) 2015

The SLEP 2010 aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Sutherland Shire LGA. The SLEP also aims to foster economic, environmental and social well-being and promote development that is appropriate to its context and enhances the amenity of the Sutherland Shire community and environment.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the SLEP 2015 and matters raised by Council in its assessment of the development (see **Section 5**). The Department concludes the development is consistent with the relevant provisions of the SLEP 2015. Consideration of the relevant clauses of the SLEP 2015 is provided in **Table B3**.

**Table B3** | Consideration of the SLEP 2015

PLEP 2015	Department's Consideration
Clause 2.1 Land use zones	The proposed hospital use is permissible with development consent in the SP1 Special Activities zone.



Clause 4.3 Height of buildings	There is no height of building standard that applies to the site.
Clause 4.4 Floor space ratio	There is no floor space ratio development standard that applies to the site.
5.10 Heritage conservation	The site is not a heritage item or within a heritage conservation area. The Department considered the potential heritage impacts of the development in <b>Section 6.4</b> and is satisfied the proposal would not result in any adverse outcomes for heritage conservation.
Clause 5.21 Flood planning	<p>The clause provides that the consent authority must be satisfied that the development is compatible with the flood function and behaviour of the land, will not adversely affect flood behaviour resulting in adverse impacts on other development or properties, incorporates measures to manage risk, and will not significantly impact the environment.</p> <p>The Department has considered flooding impacts in detail in <b>Section 6.4</b> and is satisfied that the development will not result in unacceptable flood risk.</p>
Clause 6.2 Earthworks	<p>The clause provides that the consent authority must consider the likely disruption of earthworks on drainage patterns and soil stability, future use and redevelopment of the land, the quality of excavated soil or fill, the likelihood of disturbing relics, the effects of earthworks on waterways, drinking water catchments and neighbouring amenity, and appropriate measures to mitigate the impacts of development.</p> <p>The Department has considered the impacts of the proposed earthworks in detail in <b>Section 6.4</b> and is satisfied that subject to conditions, the development is acceptable.</p>
Clause 6.4 Stormwater management	<p>The clause provides that the consent authority must be satisfied that the development is designed to maximise the use of water permeable surfaces, includes (if practicable) on-site stormwater retention for use as an alternative water supply, and avoids any significant adverse impacts of stormwater runoff.</p> <p>The Department has considered the proposed stormwater management measures in detail in <b>Section 6.4</b> and is satisfied that subject to conditions, the development is acceptable.</p>
Clause 6.16 Urban design – general	<p>The clause provides that the consent authority must consider the extent to which the development has:</p> <ul style="list-style-type: none"> <li>• attained high quality design and development outcomes,</li> <li>• strengthened, enhanced or integrated into the existing character and contributed to future desired character.</li> <li>• given recognition to the public domain.</li> <li>• retained or enhanced the natural environment.</li> </ul>

- responded to the natural landform of the site.
- preserved, enhanced or reinforced specific areas of high visual quality.
- considered principles for minimising crime.

The Department has considered the principles of urban design in its assessment of the proposal at **Section 6** and is satisfied that subject to conditions, the development is acceptable.

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### Development control plans

In accordance with Clause 11 of the SRD SEPP, development control plans do not apply to SSD.

Notwithstanding this, the objectives of relevant controls under the SDCP 2015, where relevant, have been considered in **Section 6** of this report.

## Appendix C – Recommended Instrument of Consent