



RESPONSE TO SUBMISSIONS REPORT

BLACKTOWN MT DRUITT HOSPITAL BLACKTOWN CAMPUS STAGE 1 EXPANSION

Prepared for



**By
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1. INTRODUCTION

1.1 Project as Exhibited

This Response to Submissions Report relates to State Significant Development application for Stage 1 Expansion of Blacktown Campus of Blacktown Mount Druitt Hospital (BMDH) (SSD5263).

The development involves:

- a new clinical services building (CSB) of approximately 32,000m² constructed over 8 levels including 2 basement levels, five clinical services levels and a rooftop plant level and containing:
 - Approximately 185 inpatient beds (coronary care, cardiology, respiratory medicine, acute aged care, cancer, surgical day only, renal dialysis);
 - Comprehensive Cancer Care Centre (2 linear accelerators (with 3 bunkers + expansion), radiation therapy, medical oncology, outpatient clinics and clinical trials);
 - Additional outpatient clinics; and
 - Expansion of pharmacy and pathology;
- Alterations to the existing main hospital buildings to complement the new buildings and integrate services. These include:
 - An expansion in emergency department capacity (urgent care centres etc) and colocated PECC; and
 - 8 additional intensive care beds;
- An internal hospital street to join the new and existing buildings;
- Site landscaping providing an integrated landscape plan for the whole site;
- The provision of a new permanent access to the site from Blacktown Road;
- Additional parking and entry forecourt's to the new building; and
- Associated building services.

These capital works seek to accommodate the following service priorities:

- Cancer Care - Establishment of a comprehensive cancer care centre;
- Expansion of the Emergency Department;
- Expand capacity of Critical Care, both Intensive Care and High Dependency beds;
- Inpatient beds – Medical, sub-specialities including but not limited to:
 - Cardiology – comprehensive clinical centre model:
 - CCU beds;
 - Inpatient beds – Step down and short stay;
 - Procedural and echocardiography;
 - Cath Labs to remain in Diagnostic Imaging;

- Medical Assessment Unit:
 - Beds co-located with ED;
 - Beds short stay separate inpatient unit;
- Aged Care and Rehabilitation:
 - Co-located aged care unit and acute rehabilitation unit;
 - Stroke unit;
 - Secure area for patients with challenging behaviours in Aged Care unit;
- Respiratory Medicine -Comprehensive clinical centre model:
 - Inpatient beds;
 - Non-invasive ventilation unit (Sleep clinic);
 - Respiratory function lab;
- Renal:
 - Inpatient haemodialysis unit.
- Ambulatory Care Unit;
- Additional inpatient bed capacity including medical (overnight and day stay), surgical (day only and 28-hour extended day only).

1.2 Submissions Made During Exhibition of the Project Application

The Environmental Impact Statement was exhibited from 6 September 2012 to 22 October 2012. During or soon after that period, two submissions were received by the Department of Planning and Infrastructure (DoP&I) from the public and a total of six submissions were received from agencies. These submissions are addressed below.

1.3 Structure of this Response to Submissions Report

This report:

- Provides the additional information and responds to the issues raised by the DoP&I to enable the Department to complete its assessment of the application (see Section 2); and
- responds to the issues raised in submissions (see Section 3).

Summaries of submissions received by the Department during the exhibition of the Environmental Assessment are provided in Section 3. In general terms, the main issues raised in the public submissions are reflected in the key issues raised by the Department of Planning.

2. ADDITIONAL INFORMATION REQUESTED BY THE DEPARTMENT OF PLANNING AND INFRASTRUCTURE

The Department has requested additional information to enable it to complete its assessment of the application.

2.1 Potential Underground Storage Tank

The DoP&I has requested further environmental assessment of the potential presence and contamination impact of remnant underground fuel storage tanks.

Further discussions on this have been held with Health Infrastructure and Coffey Environments, with Coffeys advising as follows:

Further to your verbal request on 26 October 2012 regarding clarification on the presence of an underground storage tank (UST) at Blacktown Hospital, Coffey notes the following.

A preliminary site contamination assessment reported by Coffey in December 2010 indicated that:

- historical records made available to Coffey indicate that a 20,000L UST was present on the site from 1976 to 1980;*
- no historical records or other evidence has been provided to Coffey to indicate whether the 20,000L UST was decommissioned, removed or may still be present on the site;*

Preliminary soil contamination sampling and laboratory analysis reported by Coffey in May 2011 did not provide any visual evidence of underground petroleum infrastructure (it is noted that the borehole locations were not designed to target specific potential UST locations). The report also recommended undertaking a non-intrusive assessment (i.e. ground penetrating radar survey) of the site, to provide further evidence as to the presence (or non-presence) of a UST and/or associated infrastructure.

Further soil sampling and laboratory analysis (to inform a waste classification assessment) reported by Coffey in June 2012 did not provide any visual evidence of underground petroleum infrastructure (it is noted that the borehole locations were not designed to target specific potential UST locations).

An unexpected finds protocol prepared by Coffey in June 2012, provided a procedure to address the identification of a UST (or associated infrastructure) during construction works at the site. Coffey understands that excavation depths across the site will range between 6m and 9m below existing ground level. Based on Coffey's experience, it would not be unreasonable to assume that a UST is unlikely to be located at depths of 6m or more below ground surface. Consequently, it would be reasonable to assume that if a UST (or evidence of a former UST) was present within the excavation footprint at the site, it could be discovered during excavation works, at which time further contamination assessment and/or validation works could be undertaken. Implementation of the unexpected finds protocol (including training of workers) will assist in facilitating this process.

The Unexpected Finds Protocol developed by Coffey Environments is contained in Appendix 1.

In the absence of any information on the location of the UST, if it does indeed exist, it would be an expensive and potentially futile exercise to carry out ground penetrating radar investigations across the whole site in an attempt to locate a UST. Consequently it is considered that the unexpected finds protocol is the appropriate response to the potential presence of a UST. It is proposed that the document contained in Appendix 1 will be implemented during construction of all development on the site.

2.2 Application of SEPP No 33A Act

We are advised that the estimated materials to be stored in the expanded gas store are:

- Cryogenic oxygen vessels – an additional 8,000L vessel. Currently there are two vessels in this area – 1 x 7,000L vessel and 1 x 1,500L vessel.
- 50 x Class 2.2 G size (50L) gas cylinders comprising nitrous oxide (laughing gas), dental air and surgical tool air;
- 40 x Class 2.2 G size (50L) gas cylinders comprising nitrous oxide (laughing gas), medical air and oxygen;
- Flammable liquids store – tins of paint and potentially small amounts of Class 3 goods such as petrol (50L); ethyl alcohol (430L), methanol (180L) and the like.

Consideration has been given to the *Hazardous and Offensive Development Application Guidelines - Applying SEPP 33* prepared by the Department of Planning in 2011.

It is noted that hospitals are not listed as an industry that is potentially hazardous in Appendix 3 of the SEPP.

The SEPP defined a *potentially hazardous industry* to mean

a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would pose a significant risk in relation to the locality: (a) to human health, life or property, or (b) to the biophysical environment, and includes a hazardous industry and a hazardous storage establishment.

The types, quantities and storage of goods outlined above have been compared with the General Screening Threshold Quantities provided in Table 3 of the *Hazardous and Offensive Development Application Guidelines - Applying SEPP 33*. The quantities are such that the thresholds are not reached.

As stated in the EIS, the design of the facilities for the receiving, storage, handling and use of dangerous goods will be in accordance with relevant codes and standards.

2.3 Amended Plans to Blacktown Road

DoP&I have requested details of the amended design of the intersection design for the new intersection with Blacktown Road. These plans are contained in Appendix 2A. The changes are to detail with the basic layout of intersection remaining the same. The changes result in improvements to pedestrian and traffic movements and to pedestrian safety and have been agreed with the RMS. Amended landscape plans are also provided in Appendix 2B.

2.4 Signage Details

DoP&I have requested details of the proposed sign at the new entrance to the hospital. These details are provided in Appendix 3. The sign will be a business identification sign as defined under SEPP No 64 Advertising and signage. It is noted that the RMS has proposed a condition to the grant of its concurrence to an application for approval under S138 of the Roads Act, 1993 requiring signs to be constructed entirely within the property and to not have:

- flashing lights;
- electronically changeable messages;
- animated display;
- complex displays that hold a drivers attention;
- displays resembling traffic signs; or
- a method of illumination that distracts or dazzles.

The proposed signs do not have these characteristics.

Because the signs are classified as business identification signs, Part 3 of SEPP No 64 Advertising and Signage does not apply.

Clause 8 provides that a consent authority must not grant consent to display any signage unless the consent authority is satisfied that the signage is consistent with the objectives of the policy and that the signage satisfies the assessment criteria in Schedule 1.

The objectives of this SEPP are:

- (a) *to ensure that signage (including advertising):*
 - (i) *is compatible with the desired amenity and visual character of an area, and*
 - (ii) *provides effective communication in suitable locations, and*
 - (iii) *is of high quality design and finish, and*
- (b) *to regulate signage (but not content) under Part 4 of the Act, and*
- (c) *to provide time-limited consents for the display of certain advertisements, and*
- (d) *to regulate the display of advertisements in transport corridors, and*
- (e) *to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.*

The site has a long frontage to Blacktown Road and the proposed signs have the primary purpose of identifying the hospital and directing patients and visitors to the main entrance and emergency departments. The signs are placed near the site entrances from Blacktown

Road. It is considered that the signs are of public benefit and are consistent with the objectives of SEPP 64.

The criteria in Schedule 1 are listed below, together with an assessment thereof, to satisfy the requirements of Clause 8.

1. Character of the Area:

- *Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?; and*
- *is the proposal consistent with a particular theme for outdoor advertising in the area or locality?*

The signs are consistent with each other and the approved use of the land for a hospital with an emergency department. The signs are compatible with the character of the area being on the edge of the Blacktown CBD. There is no consistent theme in the area for outdoor signage/advertising.

2. Special Areas:

- *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 signs are not located within the vicinity of any special areas or heritage items. While the signs are designed to be visible from Blacktown Road, they have an appropriate scale and will not detract from the amenity and visual quality of the area.

3. Views and Vistas:

- *Does the proposal obscure or compromise important views?;*
- *does the proposal dominate the skyline and reduce the quality of vistas?; and*
- *does the proposal respect the viewing rights of other advertisers?*

There are no views or vistas that could be obscured by the proposed signs. Nor will the signs dominate the skyline or reduce the rights of other landowners.

4. Streetscape, Setting and Landscape:

- *Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?;*
- *does the proposal contribute to the visual interest of the streetscape, setting or landscape?;*
- *does the proposal reduce clutter by rationalising and simplifying existing advertising?;*
- *does the proposal screen unsightliness?; and*
- *does the proposal protrude above buildings, structures or tree canopies in the area or locality?*

The signs are located on a long stretch of road which contains other advertising structures. The signs are considered to be appropriate in size and location. The signs do

not protrude above buildings, structures, or tree canopies in the locality. It is not the intention of the proposal to screen any unsightliness or rationalise/simplify existing signage.

5. Site and Building:

- *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?;*
- *does the proposal respect important features of the site or building, or both?; and*
- *does the proposal show innovation and imagination in its relationship to the site or building, or both?*

The signs are compatible with the scale and proportions of the existing and proposed development. There are no special features associated with the site or surrounding buildings that need to be respected. The signs show innovation in design and are informative and modern.

6. Associated devices and logos with advertisements and advertising structures:

- *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?*

No safety devices are necessary for the signs.

7. Illumination:

- *Would illumination result in unacceptable glare?;*
- *would illumination affect safety for pedestrians, vehicles or aircraft?;*
- *would illumination detract from the amenity of any residence or other form of accommodation?;*
- *can the intensity of the illumination be adjusted, if necessary?; and*
- *is the illumination subject to a curfew?*

The signs are proposed to be illuminated by internal lighting devices. This illumination would not result in unacceptable glare, would not compromise safety for pedestrians, vehicles or aircraft and would not detract from the amenity of any residence. The signage is not proposed to be subject to a curfew and the brightness of the lighting would not need to be adjustable.

8. Safety:

- *Would the proposal reduce the safety for any public road?;*
- *would the proposal reduce the safety for pedestrians or bicyclists?; and*
- *would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?*

The signage will not affect safety on any public road or reduce pedestrian sight-lines from public areas. The signs will not obstruct any sight lines in the locality and will

not be a distraction to motorists or pedestrians. The signs will assist public safety by directing persons to the hospital.

It is considered that the signage satisfies the assessment criteria in Schedule 1.

2.5 Bicycle Parking

Bicycle parking is provided on a campus wide basis. The approved multi-storey car park provides approximately 40 bicycle parking spaces. A response to the request of the Department in relation to bicycle parking and end of journey facilities has been provided by Arup and is contained in Appendix 4.

3. MATTERS RAISED IN SUBMISSIONS

The matters raised in submissions are addressed in the following table.

It is considered that all matters raised by the submissions have been adequately addressed below.

No.	Submitter	Issues Raised	Response and Mitigation Strategy
Public Submissions			
1	Public Submission – nearby resident	<ul style="list-style-type: none"> Concerned about loss of security and privacy Request a new 182mm cream colorbond fence 	<p>The writer's property adjoins a proposed ground level public car park in an area currently occupied by a demountable. This car parking area does not form part of this development application.</p> <p>The subject property is approximately 105 metres from the proposed hospital building and will not suffer any significant change in privacy or security as a result of the development. The existing boundary condition comprises part metal and part timber fence to a height of approximately 1.8 metres. This fence will be retained.</p>
2	Public Submission – staff member	<ul style="list-style-type: none"> Concerned that adequate parking is provided 	<p>Parking investigations reported in the EIS establish the need for parking for the development. Parking to meet the assessed needs will be provided on site primarily through the provision of a multi-storey car park.</p> <p>Additional parking will be provided during construction for staff and construction workers so that the hospital can continue operating and access to health services is maintained.</p>

Government Authority Submissions			
1	Sydney Water	<ul style="list-style-type: none"> SW reissued a feasibility letter dated 26 July 2011 	<p>This letter has been superseded by the revised advice received from Sydney Water on the 18th October 2012.</p> <p>All Sydney Water requirements will be met.</p>
2	RMS	<ul style="list-style-type: none"> Construction Access: RMS request that the temporary construction access be closed once construction of a stage of the project is completed. This is because the RMS perceives that there is no certainty on a completion timeframe for the hospital. 	<p>The completion of overall hospital upgrade is planned for mid-2016.</p> <p>It is proposed that the permanent intersection arrangement will be in place prior to the Stage 1 hospital completion therefore there will be no requirement to temporarily close the construction access.</p>
		<ul style="list-style-type: none"> Permanent Vehicular and Pedestrian Access: RMS raise no objection to the new intersection 	Noted
		<ul style="list-style-type: none"> Exercise of concurrent functions: RMS has indicated its willingness to grant concurrence under S138(2) of the Roads Act for an application for works to Blacktown Road and advises of the conditions of this concurrence 	<p>The conditions advised by the RMS are relevant to an application under S138 of the Road Act subsequent to development consent. Notwithstanding this, the conditions are acceptable to HI except for the following.</p> <p>In relation to condition 3, it is noted that an occupation certificate is not required for Crown building works. The applicant's intention is that the construction of the permanent intersection will take place in conjunction with the completion of</p>

			<p>the Stage 1 hospital expansion in mid-2016.</p> <p>It is also noted that Traffic Control Plans and Construction Traffic Management Plans have been prepared in relation to the construction of the car park building and will be used for construction of the Stage 1 hospital expansion.</p> <p>In relation to proposed condition 13, the construction access may be used during the construction of the permanent intersection with access managed by the above mentioned plans.</p> <p>Condition 16 should be amended to relate only to the permanent intersection stormwater drainage system and not the stormwater system within the site which will be managed and certified by HI.</p> <p>In relation to condition 25, it is noted that the sign is a business identification sign and not general advertising and so clause 23 of SEPP 64 would not apply. However the design requirements noted by the RMS will be met.</p>
		<ul style="list-style-type: none"> Advisory Note: RMS advises that buses should be able to circulate within the site as right turn movements at the new intersection are prohibited. 	<p>This is addressed in the response provided by Arup contained in Appendix 5.</p>
		<ul style="list-style-type: none"> Advisory Note: RMS advises that pedestrians are to be catered for during construction 	<p>Pedestrian access during construction will be provided in accordance with the Traffic Management for the site.</p>

3	EPA	<ul style="list-style-type: none"> EPA advises that the environmental impacts of the development can be appropriately managed 	Noted
		<ul style="list-style-type: none"> Differences in background noise levels not explained EPA provides recommended conditions of consent EPA recommends air quality measures for dust and exhaust emissions 	<ul style="list-style-type: none"> Acoustic Logic advises that differences in background noise readings are due to traffic noise. EPA recommended conditions are acceptable. Dust suppression measures are proposed during construction. There are no significant exhaust emissions proposed. Erosion and sedimentation controls will be implemented during construction. Proposed condition is acceptable.
4	OEH	<ul style="list-style-type: none"> No comment 	Noted

5	Transport for NSW	<p><i>Bus Servicing</i></p> <ul style="list-style-type: none"> TfNSW request that buses be able to turn onsite, entering and existing from Marcel Crescent <p><i>Pedestrian Accessibility</i></p> <ul style="list-style-type: none"> TfNSW feel that pedestrian accessibility to public transport and bus services are not adequately addressed and recommend a number of improvements including sheltered accessible bus stop near Marcel Crescent; the relocation of the existing bus stop from near Marcel Crescent closer to the intersection; and the provision of access from the existing bus stop directly to the main entrance to the hospital 	<p>This is addressed in the advice from Arup contained in Appendix 5.</p> <p>A meeting was held with TfNSW on Thursday 8 November 2012 to discuss the comments and recommendations from TfNSW.</p> <p>In relation to buses servicing the site it was noted that the existing shuttle bus service will continue to service the site. The internal loop shown in Figure 2 of Appendix 5 could also be used by Busways Route 721 which would mean that the existing clockwise route direction could be maintained. HI agreed to review options for existing bus routes within the campus and to meet again with TfNSW to discuss those options. The circulation routes for buses within the campus will be agreed prior to commencing construction.</p> <p>Further, TfNSW agreed to review the location of a bus stop on the eastbound bus route on Blacktown Road to improve its proximity to the intersection of Marcel Crescent and thus improved pedestrian access to the site from public transport on Blacktown Road.</p> <p>The current pedestrian access to the campus will be improved due to the establishment of a new access from Blacktown Road at the eastern end of the campus.</p> <p>The existing pedestrian linkages from public transport routes will be maintained.</p>
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6	Blacktown Council	<ul style="list-style-type: none"> BCC raises no objections in principle to the proposed development 	Noted
		<ul style="list-style-type: none"> BCC advises that the applicant has requested council to defer all necessary drainage works for the recently approved deck carpark to form part of this approval. Therefore Council submits that it is essential that all drainage requirements outlined in the conditions attached are included in any consent issued by the Minister. 	<p>The applicant has not requested Council to defer any necessary drainage works for the recently approved deck carpark to form part of this approval. The required drainage works are being undertaken in conjunction with construction activity on the site and form part of works undertaken under ISEPP 2007 or the consent from Council. Thus there is no need for the conditions regarding drainage requirements attached to Council's letter to be included in the consent as no such drainage works are proposed as part of this application and appropriate conditions are included with the consent to the multi-storey car park.</p>

APPENDICES

APPENDIX 1

Unexpected Finds Protocol developed by Coffey Environments

APPENDIX 2A

Amended Intersection Drawings

APPENDIX 2B

Amended Landscape Drawings

APPENDIX 3

Signage Details

APPENDIX 4

Advice on Bicycle Parking Provision by Arup

APPENDIX 5

Advice on Pedestrian Access and Public Transport by Arup