

12 May 2015

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally

Request for Secretary's Environmental Assessment Requirements Blacktown Hospital Redevelopment Stage 2

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), Health Infrastructure request the issue of Secretary's Environmental Assessment Requirements (SEARs) for Stage 2 of the redevelopment of the Blacktown Hospital. Stage 2 of the redevelopment will be delivered in two (2) stages. On that basis, SEARs for a Staged State Significant Development Application in accordance with Section 83B of the *Environmental Planning and Assessment Act 1979* (EP&A Act) are requested. This application seeks approval for the Concept and the Stage 1 works which will comprise early and enabling works and bulk excavation. A separate DA will be submitted for the Stage 2 works which will involve the construction and fitout of the new Acute Services Building.

The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued.

The Site

Site Description

The Blacktown Hospital campus is located at 18 Blacktown Road, Blacktown and is approximately 1.2 km south-east of Blacktown town centre and Blacktown Railway Station.

The site falls from a high point of RL72m in the south to RL55m in the north towards Blacktown Road. At Blacktown Road the topography varies from a low point near Marcel Crescent in the west of RL44m to RL55m to the east. This gives a general height variation of about 22-28m across the site.

The Blacktown Hospital campus is approximately 13 hectares in area and has street frontages to Blacktown Road and Marcel Crescent / Panorama Parade. General access to the site is principally via Marcel Crescent with servicing also available from Blacktown Road. Construction access is also presently available off Blacktown Road.

The real property description of the site / campus is Lots 300, 301, 306, 308 in DP15914, Lot 1 in DP 128344, Lot 3 in DP71010 and Lot 1 in DP730307. The site is owned by the Health Administration Corporation.

The Blacktown Mount Druitt Hospital (BMDH) comprises health services located on two separate campuses: Blacktown campus and Mount Druitt campus. The campuses work in

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clinical partnership with each playing a complementary role in providing health services to the communities under the administration of the Western Sydney Local Health District (WSLHD). The WSLHD broadly services the LGAs of Blacktown, Parramatta, Holroyd, Hawkesbury, Penrith and Fairfield. ***This application applies only to the Blacktown Campus.***

Health and clinical services provided at the 330-bed Blacktown Hospital (pre-Stage 1 Redevelopment) include:

- Pre-admission clinic
- Cardiac care and services, including cardiac and pulmonary rehabilitation
- Rehabilitation Hub incorporating Rehabilitation and Aged Care with Inpatient and Out-patient services
- Ante-Natal and Gynaecology Unit
- Delivery Suite and Post Natal Care
- Special Care Nursery
- Mental Health Services
- Surgical and Surgical short stay unit
- High dependency Unit
- Community Health Services including Dental
- Acute Medical Care
- Diabetes Centre
- Coronary Care and Coronary Step down Unit
- Gastroenterology/Hepatology, including:
 - IBD Services
 - Liver Services
 - Endoscopy
- Acute Stroke Unit
- Day Procedure Unit
- Intensive Care Unit
- Orthopaedic Unit
- Regional Dialysis Centre
- Oncology Services
- Acute Rehabilitation

The hospital campus was first developed in the 1960s and was redeveloped and expanded in the 1990s. The range of uses are generally accommodated in the existing 4-level main building with uses (such as renal, oncology, mental health, and community health and dental) accommodated in smaller low-rise buildings around the site's periphery.

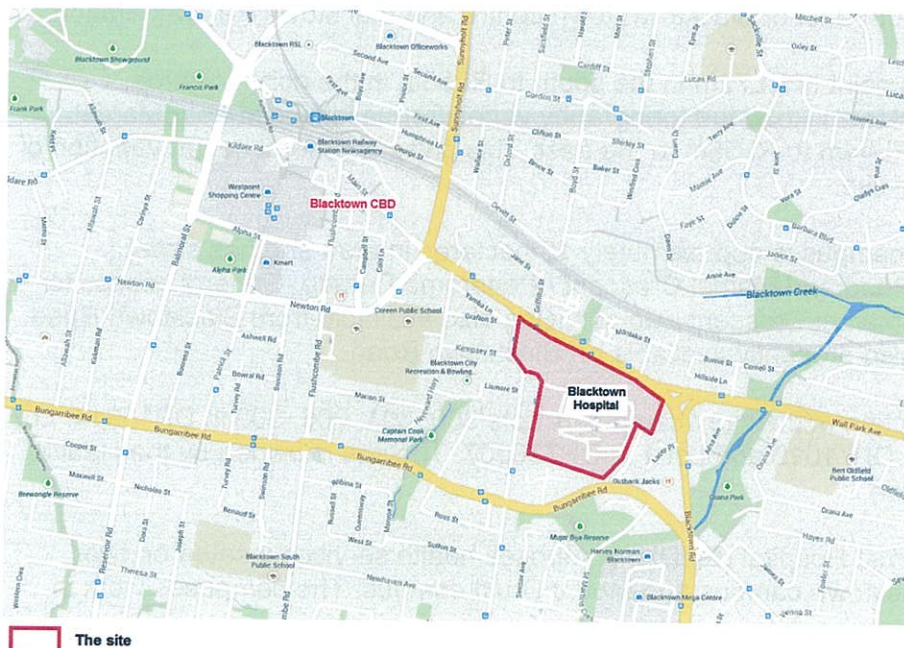


Figure 1 Location



Figure 2 Blacktown Hospital campus – Aerial View (20 October 2009) *Source: nearmap*

Aerial photographs of the site taken both before and after commencement of the Stage 1 works are provided at **Figure 2** above and **Figure 3** below. A current map of the campus is shown at **Figure 4**.



Figure 3 Blacktown Hospital Aerial view (30.4.15) (source nearmap)



Figure 4 Current map of the Campus Source: Western Sydney Local Health District

Recent and Planned Development

The delegate of the Minister for Planning approved the Stage 1 Redevelopment at the Blacktown campus (SSD 5263) on 21 December 2012.

The Stage 1 expansion at the Blacktown Hospital campus comprised:

- 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 co-located Psychiatric Emergency Care Centre; 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 forecourts to the new building; and
- Associated building services.

The Stage 1 Redevelopment SSD has been modified on two (2) occasions with respect to approved hours of construction. Other recent development at the Blacktown Hospital campus not part of the Stage 1 Redevelopment includes a new 662-space multi storey car park to the south of the new Stage 1 building. This DA was approved by the Sydney West Joint Regional Planning Panel (JRPP) on 2 August 2012, and was recently completed and opened.

Other works that have recently been approved under Part 5 of the *Environmental Planning and Assessment Act (EP&A Act)* including:

- The addition of a 20 bed sub-acute mental health facility at the Blacktown Hospital campus; and
- Civil works including services diversions, minor building relocations, demolition, parking areas, internal road works and access works, tree removal and preparatory site works to enable the existing hospital to continue functioning during the construction program.

Description of proposed development

This SSD application will seek consent for the Stage 2 Expansion of the Blacktown Campus of the BMDH in two (2) stages. The first stage of the works involves early preparatory works, including bulk excavation to facilitate the second stage, which includes construction of the new 6 to 7 storey Acute Services Building (ASB), refurbishment of the existing (c.2000) hospital building and construction of the Hospital Street extension. Draft Architectural Drawings prepared by Jacobs have been provided for information purposes (see attached).

The Stage 2 Expansion will be undertaken with careful planning and sequencing of works to enable the development to proceed whilst the existing Hospital continues to function, and to maintain services and safety for patients, visitors and staff. This is the same approach taken for the completed Stage 1 Redevelopment works.

Strategic context and need for the development

Need for the Redevelopment

The NSW Government is planning for continuing rapid population growth of over 2% per annum within the Blacktown LGA for the foreseeable future. The impact of this growth on local health care services is compounded by the growth in the older population and associated increase in patient acuity and complexity. The following outlines the strategic need for the Stage 2 Redevelopment works at BMDH:

Population Growth

The Blacktown LGA is projected to experience significant increases to 2026 and beyond, increasing from 348,847 people in 2011 to 428,485 people in 2026. When considered in context of the regional growth expected in other WSLHD LGAs, this alone reinforces the need for BMDH to increase capacity and capability to support its role in managing local and District health service demand.

Aging Population

The number of people aged 65 years and above is projected to almost double from 27,955 people in 2011 to 55,699 people in 2026, highlighting the need for the volume and type of health services to adapt to the changing dynamics of the population.

Increase in demand

A 102.4% increase in the total number of acute separations at BMDH from 27,284 (in 2011/12) to 52,217 (in 2026/27), with the total number of bed days increasing from 112,956 to 200,263 over the same period.

Critical Care projections

Critical Care (emergency and intensive care), Surgical and Women's and Newborn Care are areas which will experience an increase in the projected levels. Demand is being placed on hospitals to optimise the critical functional relationships between these services, including Maternity and Imaging services to ensure value for money and future sustainability.

Cancer services

The WSLHD has highlighted the need to address key service enhancements that are integral to supporting the provision of a comprehensive cancer care service within its delineated role for the WSLHD. This includes requirements for Surgical Oncology and Endoscopy at Blacktown Hospital.

Ambulatory Service

There is an increasing need to enhance the existing and enable more ambulatory service deliver models, particularly to improve the care experience of patients with chronic conditions.

Changing needs of the population

Patient mix and evolution of models of care have and will change in the future. There is a need to highlight efforts to enhance the various transitions of care that individual patients may experience across the care continuum. Associated with this, is achieving optimal utility from the new capacity that is being delivered in the BMDH Stage 1 Expansion and realising the expected benefits of new and innovative models of care aimed at streamlining the care of patients with chronic disease, avoiding presentations to Emergency Department and enhancing the care experience for patients and carers.

Strategic Planning Context of the Stage 2 Expansion

The expansion of the BMDH is a high priority of the NSW Government, NSW Department of Health, and WSLHD. The proposal aligns with the current policy and planning context at District and State levels that support the BMDH Stage 2 Expansion. This includes the strategic directions of the NSW Government, NSW Ministry of Health, WSLHD, and Commonwealth Government for future delivery of healthcare services. Particular State strategies that the proposal aligns with or will assist in delivering include:

- NSW Government 2021 A Plan to make NSW Number One (*NSW Government*)
 - Goal 11 - Keeping people healthy and out of hospital
 - Goal 12 - Providing world class clinical services with timely access and effective infrastructure.
 - Goal 19 – Invest in critical infrastructure
- NSW State Health Plan towards 2021 (*Health NSW*)
 - Key Directions:
 - Keeping people healthy
 - Providing world class clinical care
 - Delivering truly integrated care
 - Strategies:
 - Supporting and developing our workforce
 - Supporting and harnessing research and innovation
 - Enabling e-Health
 - Designing and building future-focused infrastructure

- A Plan for Growing Sydney (*Department of Planning and Environment*)
 - Direction 1.11: Deliver Infrastructure. Action 1.10.3: Plan For Expansion of Health Facilities To Service Sydney's Growing Population
 - Western Central Subregion – Priorities
 - Support hospital-related land uses and infrastructure around Blacktown Hospital
- Infrastructure Strategy (*Infrastructure NSW*)
 - The Strategy identifies the clear need for ongoing planned and systematic investment and management of health infrastructure.
 - Identifies proposed major works at Blacktown / Mt Druitt / Westmead hospitals.

Planning context

Environmental Planning and Assessment Act 1979

Part 4 Division 4.1 of the EP&A Act establishes the assessment framework for SSD. Section 83B provides for staged development applications. Under Section 89D the Minister for Planning is the consent authority for SSD and Section 78A(8A) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the Policy provides that:

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

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

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

Other Planning Policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SSD application:

- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55);
- State Environmental Planning Policy (Infrastructure) 2007; and
- State Environmental Planning Policy No 33—Hazardous and Offensive Development.

Local Environmental Plans

Blacktown Local Environmental Plan 1988 (LEP 1988) is the applicable current local planning instrument for the site and establishes the relevant land uses and other development standards for the site. Blacktown's comprehensive LEP (draft LEP 2013) was due to be gazetted in mid-2014 and will replace LEP 1988. It is understood the draft instrument is currently with the Department of Planning & Environment for completion and gazettal.

As the comprehensive LEP is imminent, both the current and draft planning controls will need to be considered for the SSD application. For the purpose of the SEARs request, an overview of the current and draft controls is provided in **Table 1**.

Table 1 – Existing and draft planning controls

Blacktown LEP 1988	Draft Blacktown LEP 2013
Zoning	
The sites are zoned No 5 (a) (Special Uses—Hospital).	The sites are zoned SP1 Health Services Facility.
The objectives of this zone specifically relate to identifying land which is currently used by public authorities, organisations and the Council to provide certain community facilities and services including hospitals.	The objectives of this zone are to provide for special land uses that are not provided for in other zones.
Development for the purpose of hospitals and purposes normally associated with and ancillary to hospitals is permissible under the zoning.	Development for the purpose shown on the Land Zoning Map (i.e. Health Services Facility), including any development that is ordinarily incidental or ancillary to development for that purpose; Flood mitigation works; Recreation areas; Roads.
Height	
N/A – there is no height control.	N/A – there is no height control.
Floor Space Ratio	
N/A – there is no FSR control.	N/A – there is no FSR control.

The campus is not mapped as being affected or impacted by any of the following Under Blacktown LEP 1988:

- Flooding (either local or mainstream); or
- Bushfire.

Similarly, the campus is not mapped as being affected or impacted by any of the following under Draft Blacktown LEP 2013:

- Land Reservation Acquisition;
- Heritage;
- Terrestrial Biodiversity;
- Key Sites; or
- Active Street Frontages.

The site is identified on Council's Design Excellence map under draft BLEP 2013, and so the design excellence provisions under Clause 7.9 as it is presently proposed will apply to the construction of new buildings, as well as external alterations to existing buildings. The Design Excellence clause aims to deliver a high standard of architectural and urban design and will consider the architectural design, materials and detailing of the proposed development in the context of the immediate and surrounding area.

Preliminary impact identification and risk assessment

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

Traffic and Parking

Traffic generation and impacts in and around the site: Traffic analysis will be undertaken to determine the appropriate access arrangements for the site, in addition to analysis of parking demand.

Contamination

Preliminary assessments show that there is a low to medium likelihood of contamination within the development zone of the hospital site. An assessment against SEPP 55 will be submitted with the DA.

Noise and Vibration

An analysis of the construction and operation noise will require careful consideration of impacts upon the amenity of residential uses nearby. An acoustic and vibration assessment will be submitted with the future DA.

Archaeology and Heritage

The Stage 1 DA was accompanied with an archaeological assessment which confirmed that there are no items of State or local heritage significance on the site. Further, no issues were raised by the local Aboriginal Community during consultation for the Stage 1 works which were undertaken in accordance with OEH guidelines.

Request for Secretary's Environmental Assessment Requirements

On the basis that the proposal falls within the criteria identified in Schedule 1 of the State and Regional Development SEPP, Health Infrastructure formally request that the Department of Planning and Environment issue the SEARs to facilitate the preparation of the Environmental Impact Statement to accompany a Staged Development Application for the proposal described above.

If you require any additional information please contact Leoné McEntee on 9978 5420 or 0410 432 505.

Yours sincerely
Health infrastructure



Sam Sangster
Chief Executive

