

17 April 2019

Mr Jim Betts  
Secretary  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2000

*Attn: Ms Teresa Gizzi*

Dear Ms Gizzi,

**Stage 2 of the Hornsby Ku-ring-gai Hospital (SSD 8647) - Proposed amendment to condition B17 Storage and Handling of Waste – Section 4.55 (1A) Application**

Approval was granted for Stage 2 of the Hornsby Ku-ring-gai Hospital Redevelopment on 30 May 2018, and included condition B17 – requiring the provision for separate storage and collection of organic food waste at the Hospital. This condition cannot be met by the Hospital, because there is no service that collects or separates food waste from the hospital. Waste services for all hospitals within the Northern Sydney Local Health District (NSLHD) operate under a single LHD wide contract. There is currently no provision for separate storage and collection of organic/ food waste at Hornsby Hospital, or any hospital within the NSLHD.

Food waste at hospitals across the LHD has been significantly reduced because food for patients is typically no longer prepared on-site. Healthshare NSW Food Services has been actively working to reduce food waste across all public Hospitals. On this basis, there is no proposal to change the waste services contract LHD wide.

Attached are the Generic Waste Stream Guidelines in use at Hornsby Hospital and across the LHD (**Attachment A**). These outline the recycling which is undertaken. Currently they are using a co-mingled recycling system, but there is a project underway to move towards a dry-mix recycling system before Stage 2 comes on line. In accordance with the submitted EIS submitted with SSD 8647, operational waste generated by the Stage 2 SSD project will be managed in accordance with the Northern Sydney Local Health District's Environmental Management Plan (EMP) and will comply with NSW Health's *Waste Management Guidelines for Health Care Facilities Policy Directive 132 updated January 2005*.

It is noted that EPA, in their Agency submission to SSD 8647 (**Attachment B**) included the following recommendation: *The proponent be required to identify and implement **feasible** and **reasonable** opportunities for the reuse and recycling of waste, including food waste.*

On this basis, it is requested that Condition B17 is amended to delete the requirement for separate storage and collection of organic/ food waste from SSD 8647, as it is both unnecessary and not feasible to implement.

### **Proposed Modification**

In order to effect this change, condition B17 in the approval needs to be amended as outlined below:

#### **Storage and Handling of Waste**

*B17. The building plans and specifications must demonstrate, for the approval of the Certifying Authority that an appropriate area will be provided within the premises for the storage of garbage bins, recycling containers and all waste and recyclable material generated by the premises. Requirements of these storage areas must:*

- a) Ensure all internal walls of the storage area are rendered to a smooth surface, coved at the floor/wall intersection, graded and appropriately drained with a tap in close proximity to facilitate cleaning;*
- b) Include provision for the separation and storage, in appropriate categories, of material suitable for recycling;*
- c) ~~Include provision for separate storage and collection of organic/ food waste~~*

#### **Substantially the Same**

The proposed modifications will have a minimal environmental impact and the proposed development will remain “substantially the same” development for which SSD Consent No 8647 was granted. The development retains the key elements of the original consent, with the description, use, nature, bulk and scale, and intensity of the development remaining unchanged.

#### **Assessment**

Section 4.55(1A) of the EP&A Act states that a consent authority may modify a development consent if “it is satisfied that the proposed modification is of minimal environmental impact”. Under Section 4.55(3) the consent Authority must also take into consideration the relevant matters to the application referred to in Section 4.15(1) of the EP&A Act. The planning assessment of the proposed modified development remains generally unchanged with respect to the relevant matters under Section 4.15(1).

The Environmental Impact Statement (EIS) submitted with the SSDA addressed compliance with the following relevant strategic and statutory plans and principles:

- Environmental Planning and Assessment Act 1979 (EP&A Act);
- Environmental Planning and Assessment Regulation 2000 (EP&A Regulation);
- Biodiversity Conservation Act 2016;
- Biodiversity Conservation (Savings and Transitional) Regulation 2017;
- State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP);
- State Environmental Planning Policy (Infrastructure) 2007 (SEPP Infrastructure);
- State Environmental Planning Policy 55 – Remediation (SEPP 55);
- State Environmental Planning Policy No 64–Advertising and Signage;
- State Environmental Planning Policy (Vegetation in Non – Rural Areas) 2017;
- Hornsby Local Environmental Plan 2013 (HLEP 2013);
- NSW Long Term Transport Master Plan 2012;

- Crime Prevention Through Environmental Design (CPTED) Principles;
- A Plan for Growing Sydney;
- NSW State Priorities;
- Sydney's Cycling Future 2013;
- Sydney's Walking Future 2013;
- Sydney's Bus Future 2013;
- Greater Sydney Commission's Draft North District Plan;
- Hornsby Development Control Plan 2013; and
- Healthy Urban Development Checklist, NSW Health.

The EIS submitted with the original SSDA in conjunction with the Response to Submissions (RtS) and additional information provided addressed a variety of environmental impacts. The development as proposed to be modified remains generally consistent with respect to the environmental impacts previously assessed.

Health Infrastructure (HI) are of the view that the consent that was granted remains substantially the same development and that the proposed modification is minor and will have minimal environmental impact on the receiving environment. On that basis, HI look forward to the Department's consideration and determination of this application. If you have any questions or wish to discuss any element of the Application, please contact Rachel Mitchell on 0438 220 252.

Yours sincerely  
**Health Infrastructure**



**Leone McEntee**  
Manager, Planning

**Att:**

- A Generic Waste Stream Guidelines
- B EPA Submission dated 13 December 2017