

BOWRAL & DISTRICT HOSPITAL REDEVELOPMENT ENVIRONMENTAL ASSESSMENT REPORT SECTION 4.55(1A) MODIFICATION

3 OCTOBER 2019
P0014888
FINAL
PREPARED FOR NSW HEALTH INFRASTRUCTURE

URBIS

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1. INTRODUCTION

1.1. OVERVIEW

This Environmental Assessment Report (**EAR**) has been prepared to support an application to modify State Significant Development (**SSD**) approval 8980 (**SSD approval**) under Section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (**EP&A Act**). This application is referred to as SSD-8980-Mod-1.

This Section 4.55(1A) application is lodged on behalf of NSW Health Infrastructure (**the Applicant**) and seeks to modify the SSD approval as it relates to the redevelopment of the Bowral and District Hospital located at 97-103 Bowral Street, Bowral (**the site**). This EAR has been prepared having regard to the Secretary's Environmental Assessment Requirements (**SEARs**) issued by the NSW Department of Planning & Environment (**the Department**) on 30 January 2018 to the original SSD application.

The objective of the approved redevelopment is to respond to the future service needs of the South Western Sydney Local Health District (**SWS LHD**) and support the increasing health service demands and new models of care being driven by a growing and ageing population. The refurbishment of existing buildings and construction of new facilities will improve the efficiency and effectiveness of service delivery at the Hospital, enhance the functionality and capacity of clinical spaces, and remedy the existing facility.

The Applicant now seeks to modify the SSD approval to capture minor design amendments to Levels 2 and 3 of the approved three-storey inpatient building fronting Bowral Street. The modifications are required to align with NSW Health Infrastructure operational requirements. The modifications are described as:

Level 2 of Approved Inpatient Building

- Additional Level 2 floorspace to accommodate hospital service rooms and back-of-house facilities (including the relocation of the existing Central Sterilising Department, pharmacy, and bathrooms);
- Total of 317.52 sqm additional floorspace;
- Minor changes to roof pitch and building elevations; and
- Minor changes to cladding and façade treatment (including external materials and finishes).

Level 3 of Approved Inpatient Building

- Extend Level 3 floorspace to accommodate plant room and an additional egress point;
- Total of 176.4 sqm additional floorspace;
- Suspended walkway over the roof;
- Roof flues and cowls at roof top level; and
- Minor changes to external materials and finishes.

The modifications relate to upper levels (Levels 2 and 3) of the proposed inpatient building. There are no modifications proposed to the ground plane, landscaping, car parking, or other at-grade or civil works.

1.2. PURPOSE OF THIS REPORT

The purpose of this Environmental Assessment Report is to:

- Describe the site, its surrounding context, and its development approval history;
- Detail the proposed modifications and required amendments to the conditions of the SSD approval);
- Review the proposed modifications against environmental planning instruments and statutory planning provisions relevant to the site and the modifications (including demonstration that the development will remain substantially the same as the development approved under SSD 8980); and
- Assess the environmental impacts of the proposed modifications relative to applicable SEARs issued for the original SSD application and pre-lodgement consultation with the Department.

1.3. SUPPORTING DOCUMENTATION

The following technical documentation and plans support the Section 4.55(1A) application.

Table 1 – Supporting Documentation

Document	Prepared by	Appendix
Revised Architectural Plans	McConnel Smith & Johnson	A
Revised Views and Perspectives	McConnel Smith & Johnson	B
Architectural Design Statement Addendum	McConnel Smith & Johnson	C
Heritage Impact Statement Addendum	Weir Phillips Heritage	D
Civil Engineering Report Addendum	Enstruct Group	E
Hydraulic Services and Integrated Water Management Plan Review	Axis Consulting Group	F
Revised Ecological Sustainable Development (ESD) Statement	Wood & Grieve Engineers	G
Electrical, ICT and Security Services Report	Wood & Grieve Engineers	H
DDA Compliance Statement	Blackett Maguire Goldsmith	I
Waste Management Plan Addendum	Capital Insight	J

2. PROJECT BACKGROUND

2.1. SSD APPROVAL

On 21 February 2018, the Minister for Planning granted consent to State Significant Development 8980 for the redevelopment of the Bowral and District Hospital. Specifically consent was granted for the following:

- Construction of a new 3 storey (plus plant) inpatient building comprising Medical, Mental Health, Acute, Sub Acute, Close Observation, Maternity, Paediatric, and Perioperative units;
- Construction of a new Emergency Department (**ED**);
- Integration of pedestrian links and connections from the new building into existing buildings and support services in retained buildings;
- A reconfigured public and ambulance entry into the ED;
- On-grade car parking and drop-off facilities, and overall improved access and wayfinding;
- Upgrades to IT and engineering services infrastructure to support the Hospital; and
- Associated landscaping works.

As detailed in the Environmental Impact Statement submitted with the original SSD application, the proposed development forms part of a wider program for the delivery of improved healthcare and associated services.

The strategic objectives of the proposed redevelopment of the Hospital are to:

- Build capacity to effectively service growing demands for healthcare;
- Redesign services bringing them closer to people and their communities;
- Improve integration with South Western Sydney Medicare Local;
- Partner with external providers to deliver public health care;
- Enhance service networks and growing centres of excellence;
- Share access to unified information for all the health care team;
- Integrate primary prevention for patients and communities; and
- Embed education and research within service delivery.

The original SSD development application was declared as state significant development because it had a Capital Investment Value (**CIV**) in excess of \$30 million and was for the purpose of a 'hospital' pursuant to Clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011.

Further design development has necessitated the modifications sought by this Section 4.55(1A) application.

2.2. PRE-LODGE MENT CONSULTATION

Consultation has been ongoing with the Department of Planning, Infrastructure and Environment (**DoPIE**), concerning the addition of the CSSD (Central Sterile Services Department) and Pharmacy into a modest addition to the approved redevelopment under SSD8980. It is noted that these are existing services on site that are to be integrated into the proposed modifications.

A scoping report was submitted to DoPIE on 12 September 2019 for review. The Applicant (NSW Health Infrastructure) was subsequently advised that the proposed planning approval pathway for the proposed modifications as detailed in the scoping report was satisfactory (on 16 September 2019).

3. SITE ANALYSIS

3.1. SUBJECT SITE

The site to which this Section 4.55(1A) application relates is described in **Table 2** and identified in **Figure 1**.

Table 2 – Site Description

Component	Description
Address	97-103 Bowral Street, Bowral
Legal Description	Lot 4 in Deposited Plan 858938
Ownership	South Western Sydney Local Health District (SWS LHD)
Site Area	32,485 sqm (excluding the area of the adjacent Southern Highlands Private Hospital – this site is legally described as Lot 4 in Deposited Plan 858938).
Local Government Area	Wingecarribee Shire Local Government Area
Existing Improvements	<p>In its existing form, the site contains a number of hospital buildings, car parking, landscaped gardens, a helipad, and dock and supply facilities.</p> <p>The north-eastern corner of the site, where the proposed development and car park will be located, comprises landscaped areas, an open car park, and a portion of the Clinical Information Department building.</p>

Figure 1 – Site



Source: Google Earth

3.2. BOWRAL AND DISTRICT HOSPITAL

Since its foundation in 1889, the Bowral and District Hospital has served the needs of the South Western Sydney Local Health District population. Having been originally established as a district cottage hospital the Hospital has undergone continued expansion and development and is now a major rural hospital. It provides a wide range acute facilities and community health services, including general medical, obstetrics and gynaecology, paediatric, surgical, orthopaedics, ophthalmology, geriatric, and emergency services. The site currently comprises several interconnected buildings, walkways, parking facilities and landscaped areas.

The Hospital has established relationships with Sydney's teaching and referring hospitals including Liverpool, Fairfield, Bankstown and Campbelltown hospitals.

3.3. SURROUNDING CONTEXT

In terms of its regional context, the site is located 1km south-east of Bowral town centre within the Southern Highlands of NSW. It is approximately 120km south-west of Sydney and 200km north-east of Canberra.

The surrounding context is characterised by a mix of low to medium density residential land uses, allied health facilities, educational establishments, community facilities, and public open space.

Aerial photography of the wider surrounding context is shown in the Figure 2 below.

Figure 2 – Surrounding Context



Source: Google Earth

4. PROPOSED MODIFICATIONS

4.1. OVERVIEW

This Section 4.55(1A) application seeks to modify the SSD approval 8980 to capture the following changes:

Level 2 of Approved Inpatient Building

- Additional Level 2 floor space to accommodate hospital service rooms and back-of-house facilities (including the relocation of the existing Central Sterilising Department, pharmacy, and bathrooms);
- Total of 317.52 sqm additional floorspace;
- Minor changes to roof pitch and building elevations; and
- Minor changes to cladding and façade treatment (including external materials and finishes).

Level 3 of Approved Inpatient Building

- Extend Level 3 floor space to accommodate plant room and an additional egress point;
- Total of 176.4 sqm additional floorspace;
- Suspended walkway over the roof;
- Roof flues and cowls at roof top level; and
- Minor changes to external materials and finishes.

The modifications are identified on the revised architectural plans at **Appendix A** and detailed as follows.

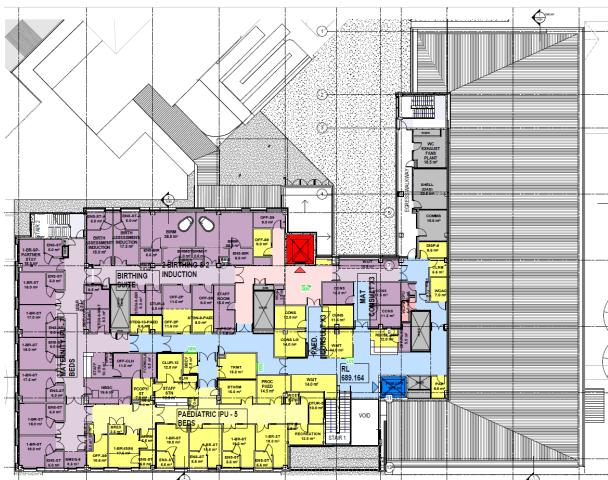
4.2. BUILT FORM

Modifications to Level 2

The additional 317.52 sqm floorspace to Level 2 accommodates hospital service rooms and back-of-house facilities (including the relocation of the existing Central Sterilising Department and pharmacy). The additional built form is set back from the main building line to reduce perceived bulk from the public domain, primarily Bowral Street to the north and residential buildings to the east.

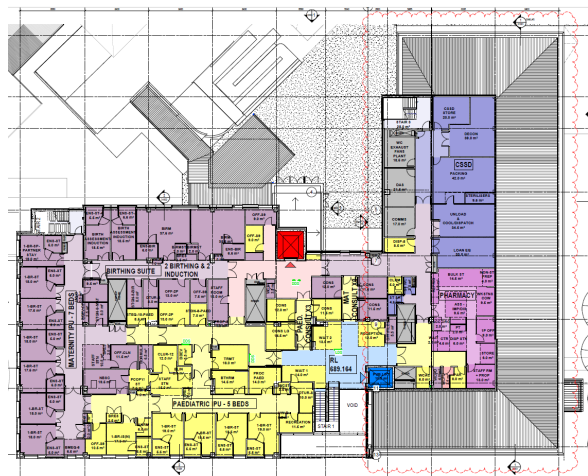
The extracts below provide a comparison between the approved and modified development at Level 2.

Figure 3 – Level 2 (Approved and Modified Development)



Picture 1 – Approved Level 2

Source: MSJ Architects



Picture 2 – Modified Level 2

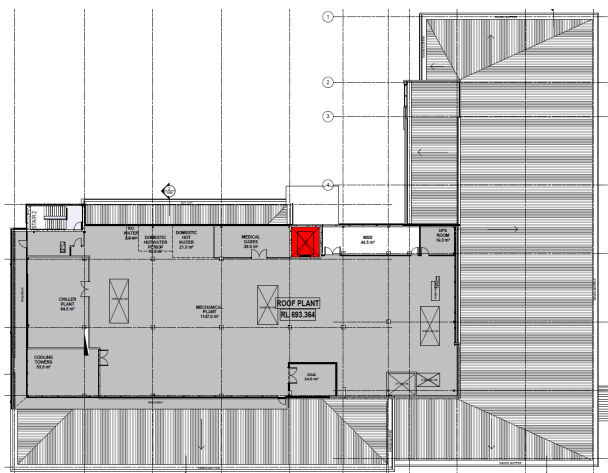
Source: MSJ Architects

Modifications to Level 3

The additional 176.4 sqm floorspace to Level 3 will accommodate a new plant room and fire egress (providing fire egress from the plant room). Modifications to Level 3 include a suspended external walkway.

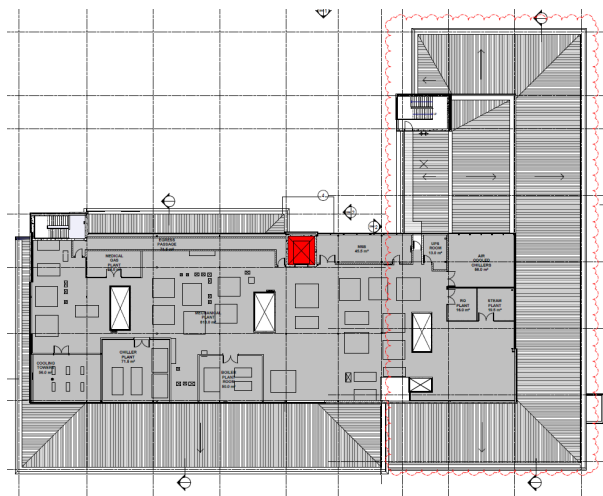
The extracts below provide a comparison between the approved and modified development at Level 3.

Figure 4 – Level 3 (Approved and Modified Development)



Picture 3 – Approved Level 3

Source: MSJ Architects



Picture 4 – Modified Level 3

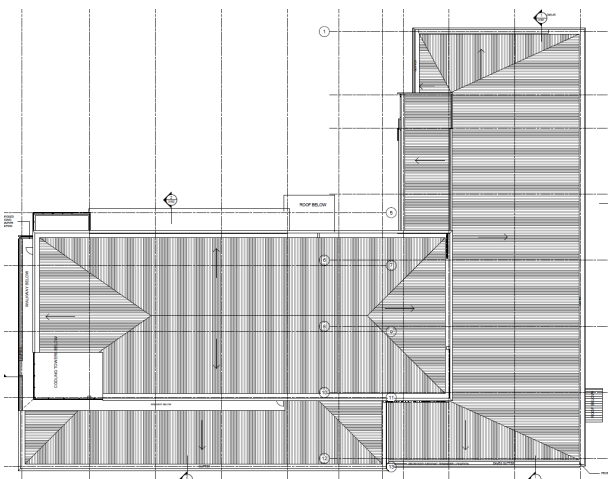
Source: MSJ Architects

Modifications to Roof Level

The modifications necessitate minor changes to the design of the rooftop level, being the inclusion of air cooled chillers on the north-facing façade. Roof flues and cowl are also provided at the roof top level.

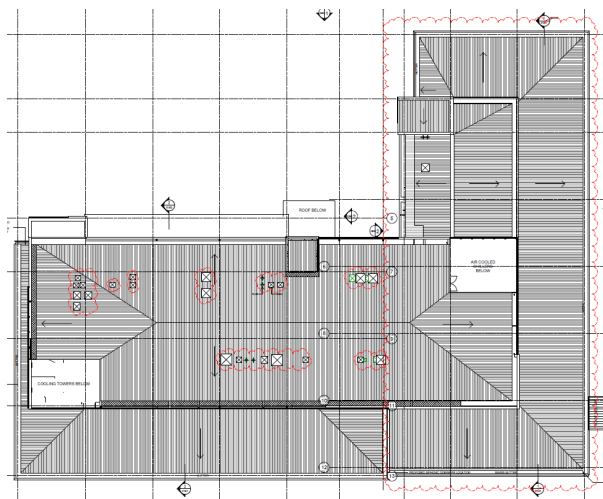
The extracts below provide a comparison between the approved and modified development at roof level.

Figure 5 – Roof (Approved and Modified Development)



Picture 5 – Approved Roof Level

Source: MSJ Architects



Picture 6 – Modified Roof Level

Source: MSJ Architects

4.3. BUILDING HEIGHT

The modifications are contained within the three-storey building form of the approved inpatient building. The modifications do not exceed the maximum building height of the approved development, being 20.3 metres.

Modified, low pitched roofs are proposed to minimize the overall height of the building.

4.4. FLOORSPACE

The modifications to the approved inpatient building will result in an additional floorspace of 317.52 sqm to Level 2 and 176.4 sqm to Level 3. In the context of the approved development, which added 8,159 sqm, the additional floor space created by the changes represents a relatively minor floorspace increase across the site.

4.5. URBAN DESIGN

The Addendum to the Architectural Design Statement (at **Appendix C**) describes the urban design rationale of the proposed modifications. Key urban design principles of the modifications are stated as follows:

- To deliver an environment of high quality standard of rural health care;
- To maintain reduced building mass on the upper levels and on the side fronting Bowral Street;
- To maximise solar access to adjoining residential buildings; and
- To allow light into internal spaces through a row of strip windows on the northern façade of the building.

4.6. ACCESS AND PARKING

The modifications will not result in an intensification of use or requirement for amendments to the approved car parking provision, vehicular access, pedestrian access, bicycle facilities, or construction access.

4.7. LANDSCAPING AND PUBLIC DOMAIN

The modifications do not propose any changes to the approved landscaping concept design.

4.8. TREE REMOVAL

The modifications do not necessitate tree removal beyond that approved by the original development. The implementation of precaution and mitigation measures to protect retained trees will be maintained.

4.9. MATERIALS AND FINISHES

The proposed modifications will incorporate external materials selected from the overall palette of materials and finishes. Selected materials to the main northern façade of Levels 2 and 3 include a mixture of metal cladding, brickwork, and louvres. This will achieve a lighter aesthetic compared to lower masonry levels.

The modifications continue the brick corner and special brick pattern on the north east corner of Levels 2 and 3. This was an important feature of the original approved design and therefore has been maintained.

4.10. SUSTAINABILITY

The Revised Ecological Sustainable Development Statement (at **Appendix G**) details the ecological sustainable development (**ESD**) commitments of the proposed modifications to the approved development.

The modified development will satisfy recognised-industry best practice standards and implement ESD initiatives that relate to:

- Building / environmental management;
- Indoor environment quality;
- Energy / greenhouse gas emissions reduction;
- Potable water reduction;
- Sustainable materials; and
- Land use and ecology.

The Statement details the proposed measures that will be implemented into the modified development in order to minimise the consumption of resources, water (including water sensitive urban design), and energy.

4.11. INFRASTRUCTURE AND UTILITY WORKS

The Electrical, ICT and Security Services Report (at **Appendix H**) describes augmentation and easement requirements of the modifications in terms of the provision of electrical and telecommunications utilities.

In terms of the main electrical supply, the maximum demand of the approved inpatient building (including the modified development at Levels 2 and 3) is estimated at 875kVA. As part of the modified development, a new 1,000kVA padmount substation and associated easements will be provided on the site and has sufficient power capacity to provide the additional power requirements for CSSD and pharmacy.

The generator load of the modified building has been estimated based on the requirements of the NSW Health Engineering Services Guidelines (August 2016). The estimated generator load is 450kVA (427kW).

To accommodate the modifications to Level, the main switchboard has increased in the number of poles to allow it to retain the 30% spare capacity that was provided by the original design to the main switchboard.

As part of the modifications to Level 2, a new Uninterruptible Power Supplies (UPS) system will be utilised as the current system has the capacity to provide the required load in CSSD and pharmacy areas.

The Level 2 modifications will be on the same Power Factor Correction Unit (**PFC**) / Active harmonic filter system and no additional PFC is required.

The modifications require additional cable trays installed to reticulate cables round the expanded area.

The modifications require new building emergency lighting and exit signs to comply with AS/NZS 2293.1.

The modifications will include fixed duress alarm system as required (to be added to the security system).

4.12. SIGNAGE

The modifications do not propose any changes to wayfinding signage or building identification signage.

4.13. REQUESTED AMENDMENTS TO CONDITIONS

The modifications will necessitate amendments to Condition A2 to SSD 8980. These modifications are outlined in **Table 3**, with additions shown in **red** and deletions shown by **strike through**.

Table 3 – Proposed Modifications to Conditions of Consent to SSD 8980

Condition	Amendment																																																
Terms of Consent A2.	<p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p> <p>(b) in accordance with all written directions of the Planning Secretary;</p> <p>(c) generally in accordance with the EIS and Response to Submissions (unless otherwise modified by the modification application);</p> <p>(d) in accordance with the approved plans in the table below:</p> <table><tr><th colspan="4">Architectural Drawings prepared by MSJ Architects</th></tr><tr><th>Dwg No</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>130443-MSJ-AR-DWG-MW03003 130443-MSJ-AR-DWG-MW2-03003</td><td>27 3</td><td>Level 2 Plan</td><td>13/07/18 11/09/19</td></tr><tr><td>130443-MSJ-AR-DWG-MW03004 130443-MSJ-AR-DWG-MW2-03004</td><td>23 3</td><td>Level 3 Plan</td><td>13/07/18 20/09/19</td></tr><tr><td>130443-MSJ-AR-DWG-MW03005 130443-MSJ-AR-DWG-MW2-03005</td><td>11 3</td><td>Roof Plan</td><td>13/07/18 20/09/19</td></tr><tr><td>130443-MSJ-AR-DWG-MW25001 130443-MSJ-AR-DWG-MW2-25001</td><td>4 2</td><td>Overall Sections – Sheet 1</td><td>25/07/18 20/09/19</td></tr><tr><td>130443-MSJ-AR-DWG-MW25002 130443-MSJ-AR-DWG-MW2-25002</td><td>4 1</td><td>Overall Sections – Sheet 2</td><td>25/07/18 20/09/19</td></tr><tr><td>130443-MSJ-AR-DWG-MW25003 130443-MSJ-AR-DWG-MW2-25003</td><td>4 2</td><td>Overall Sections – Sheet 3</td><td>25/07/18 20/09/19</td></tr><tr><td>130443-MSJOAR-DWG-MW20003 130443-MSJ-AR-DWG-MW2-20007</td><td>15 5</td><td>East Elevation – DD</td><td>14/08/18 20/09/19</td></tr><tr><td>130443-MSJOAR-DWG-MW20001 130443-MSJ-AR-DWG-MW2-20005</td><td>15 5</td><td>North Elevation – DD</td><td>14/08/18 20/09/19</td></tr><tr><td>130443-MSJOAR-DWG-MW20002 130443-MSJ-AR-DWG-MW2-20006</td><td>15 5</td><td>South Elevation – DD</td><td>14/08/18 20/09/19</td></tr><tr><td>130443-MSJOAR-DWG-MW20004 130443-MSJ-AR-DWG-MW2-20008</td><td>15 5</td><td>West Elevation – DD</td><td>14/08/18 20/09/19</td></tr></table>	Architectural Drawings prepared by MSJ Architects				Dwg No	Rev	Name of Plan	Date	130443-MSJ-AR-DWG-MW03003 130443-MSJ-AR-DWG-MW2-03003	27 3	Level 2 Plan	13/07/18 11/09/19	130443-MSJ-AR-DWG-MW03004 130443-MSJ-AR-DWG-MW2-03004	23 3	Level 3 Plan	13/07/18 20/09/19	130443-MSJ-AR-DWG-MW03005 130443-MSJ-AR-DWG-MW2-03005	11 3	Roof Plan	13/07/18 20/09/19	130443-MSJ-AR-DWG-MW25001 130443-MSJ-AR-DWG-MW2-25001	4 2	Overall Sections – Sheet 1	25/07/18 20/09/19	130443-MSJ-AR-DWG-MW25002 130443-MSJ-AR-DWG-MW2-25002	4 1	Overall Sections – Sheet 2	25/07/18 20/09/19	130443-MSJ-AR-DWG-MW25003 130443-MSJ-AR-DWG-MW2-25003	4 2	Overall Sections – Sheet 3	25/07/18 20/09/19	130443-MSJOAR-DWG-MW20003 130443-MSJ-AR-DWG-MW2-20007	15 5	East Elevation – DD	14/08/18 20/09/19	130443-MSJOAR-DWG-MW20001 130443-MSJ-AR-DWG-MW2-20005	15 5	North Elevation – DD	14/08/18 20/09/19	130443-MSJOAR-DWG-MW20002 130443-MSJ-AR-DWG-MW2-20006	15 5	South Elevation – DD	14/08/18 20/09/19	130443-MSJOAR-DWG-MW20004 130443-MSJ-AR-DWG-MW2-20008	15 5	West Elevation – DD	14/08/18 20/09/19
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130443-MSJOAR-DWG-MW20004 130443-MSJ-AR-DWG-MW2-20008	15 5	West Elevation – DD	14/08/18 20/09/19																																														

5. STATUTORY PLANNING FRAMEWORK

5.1. ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

Approval for the proposed modifications is sought in accordance with the provisions of Section 4.55(1A) of the EP&A Act. The following assesses the proposed modifications to SSD 8980 against the relevant threshold tests of Section 4.55(1A) and demonstrates that they are substantially the same as approved.

Section 4.55(1A) states as follows:

“(1A) Modifications involving minimal environmental impact

A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:

- (a) it is satisfied that the proposed modification is of minimal environmental impact, and*
- (b) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and*
- (c) it has notified the application in accordance with:*
 - (i) the regulations, if the regulations so require, or*
 - (ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and*
- (d) it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.”*

In relation to Section 4.55(1A)(a), the modifications do not alter the use of the site or represent an intensification of use that would contribute environmental impacts beyond those originally assessed and approved by the Department. Any additional impacts to the site or surrounding land uses will be negligible. Accordingly, the modifications to the approved development will be of minimal environmental impact.

In relation to Section 4.55(1A)(b), the proposed modifications to the SSDA approval will result in substantially the same development as approved (being the redevelopment of the Hospital) for the following reasons:

- The modifications will result in a total of 493.92 sqm additional floorspace to the proposed inpatient building. This represents a relatively minor increase in the context of development across the site;
- The modifications comprise minor design refinements to Levels 2 and 3 of the proposed inpatient building in response to the operational needs and requirements of NSW Health Infrastructure;
- The built form, scale, land use, and appearance will remain substantially the same as approved; and
- The overall environmental impacts of the modified development will remain substantially consistent with the approved development particularly related to acoustic, traffic, and visual impacts.

In relation to Section 4.55(1A)(c) and (d), this application will be notified in accordance with the relevant regulations. The Applicant will address relevant submissions made to the proposed modifications.

Section 4.55(3) states as follows:

“(3) In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15 (1) as are of relevance to the development the subject of the application. The consent authority must also take into consideration the reasons given by the consent authority for the grant of the consent that is sought to be modified.”

Section 8 of this EAR assesses the modifications against relevant considerations under Section 4.15(1).

5.2. BIODIVERSITY CONSERVATION ACT 2016

The original SSDA was supported by waivers from the NSW Department of Planning & Environment (dated 26 February 2018) and NSW Office of Environment & Heritage (dated 8 January 2018) advising that the development was not likely to have any significant on biodiversity values and confirming that a Biodiversity Development Assessment Report was not required. The modifications do not propose any impact on flora or fauna and as such are consistent with this assessment.

5.3. ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2000

This modification application has been prepared in accordance with the relevant State significant development requirements of the Environmental Planning and Assessment Regulation 2000.

5.4. STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Pursuant to Clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011, the original SSD development application was declared as state significant development because it was for the purpose of a 'hospital' and had a CIV in excess of \$30 million.

The modified development remains state significant development.

5.5. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (**Infrastructure SEPP**) aims to facilitate effective infrastructure and services delivery by improving regulatory efficiency through a consistent planning regime and providing greater flexibility in the location of infrastructure and service facilities.

5.5.1. Health Services Facilities

The modifications do not alter the land use of the site which remains as a 'health services facility'.

5.5.2. Traffic Generating Development

The original SSDA was not traffic generating development and did not trigger a requirement for referral to the RMS. Likewise, the proposed modifications do not the threshold for trigger traffic generating development.

5.6. STATE ENVIRONMENTAL PLANNING POLICY NO 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT

State Environmental Planning Policy No 33 – Hazardous and Offensive Development (**SEPP 33**) requires an assessment of hazardous materials, involving a screening method based on the quantities of dangerous goods on a site, to assist in determining if a development is likely to be a potentially hazardous industry.

The modifications do not alter the findings of the SEPP 33 Assessment undertaken as part of the original SSD application. It is considered that the modifications will not result in a land use or operation that is potentially hazardous.

5.7. STATE ENVIRONMENTAL PLANNING POLICY NO 55 – REMEDIATION OF LAND

State Environmental Planning Policy No 55 – Remediation of Land (**SEPP 55**) provides that a consent authority must not consent to carrying out development on land unless it has considered whether the land is suitable (or can be made suitable) for the purpose for which the development is proposed to be carried out.

The SSD application was accompanied by a detailed environmental site investigation that identified potential contamination risks at the site. The investigation was supported by a Remediation Action Plan (**RAP**) which concluded that the site can be made suitable for development if management procedures are implemented. Site remediation works include a contingency plan, a site management plan, and a validation plan.

The modified development does not alter the findings of the detailed environmental site investigation or RAP recommendations. It is considered that the modification application satisfies the provisions of SEPP 55.

5.8. STATE ENVIRONMENTAL PLANNING POLICY NO 64 – ADVERTISING AND SIGNAGE

State Environmental Planning Policy No 64 – Advertising and Signage (**SEPP 64**) seeks to improve the amenity of urban and natural settings by managing the impact of outdoor signage.

The modifications relate to minor alterations and additions to Levels 2 and 3 of the approved inpatient building. There are no changes to the approved wayfinding signage or building identification signage.

5.9. STATE ENVIRONMENTAL PLANNING POLICY (SYDNEY DRINKING WATER CATCHMENT) 2011

Due to the nature and location of the proposed modifications, it is anticipated that the development will remain consistent with State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011.

5.10. WINGECARRIBEE LOCAL ENVIRONMENTAL PLAN 2010

5.10.1. Land Zoning and Permissibility

The site is zoned SP2 (Infrastructure) under the Wingecarribee Local Environmental Plan 2010 (**LEP**). The proposed development was consistent with the objectives of the zone and is permissible with consent.

The modified development does not alter the approved land use for the purpose of a 'hospital'.

5.10.2. Building Height

The modifications are contained within the three-storey building form of the approved inpatient building. The modifications do not exceed the maximum building height of the approved development, being 20.3 metres. It is noted that the flues (as proposed to be roof top level) are excluded from the definition of 'building height'.

Notwithstanding the site is not subject to a maximum building height development standard.

5.10.3. Floor Space

The site is not subject to a maximum floor space ratio control. Notwithstanding, the additional 493.92 sqm floorspace to Levels 2 and 3 of the inpatient building represents a relatively minor increase in the context of the approved development which resulted in a total of 8,159 sqm additional floorspace across the site.

5.10.4. Heritage Conservation

The Addendum to the Heritage Impact Statement (at **Appendix D**) assesses the impacts of the modifications on heritage items within the vicinity of the site, being the Bradman Oval, Grandstand and Museum and Bowral Heritage Conservation Area. The Addendum Statement concludes that the proposed modifications will have no impact on the fabric or historic or social significance of the surrounding heritage items.

5.10.5. Flood Planning

The modifications will have minimal consequential impact on flood risks or flood mitigation measures. The floor area of the approved inpatient building (set above the adjacent PMF flood level) will be unaltered.

5.10.6. Other LEP Provisions

There are no other LEP development standards or provisions relevant to the proposed modifications.

5.11. BOWRAL TOWNSHIP DEVELOPMENT CONTROL PLAN

Clause 11 of SEPP (State and Regional Development) provides that development control plans do not apply to State Significant Development. Accordingly, the Bowral Township Development Control Plan does not apply to this modification application. Notwithstanding, it is considered that the proposed modifications to the approved development would be generally consistent with the desired future character of the site.

6. STRATEGIC POLICIES AND GUIDELINES

The original SSD application was assessed against non-statutory strategic plans and guidelines, including:

- NSW State Priorities;
- South East and Tablelands Regional Plan 2036;
- NSW Long Term Transport Master Plan 2012;
- Future Transport Strategy 2056 and supporting plans;
- Crime Prevention Through Environmental Design (**CPTED**) Principles;
- Planning Guidelines for Walking and Cycling;
- Healthy Urban Development Checklist, NSW Health; and
- Better Placed – An integrated design policy for the built environment of NSW 2017.

The SSD development was assessed as being consistent with the principles and strategic objectives of these plans and guidelines. It is considered that the proposed modifications would remain consistent.

7. ASSESSMENT OF ENVIRONMENTAL IMPACTS

On 30 January 2018, the Department issued SEARs to the original SSD application. The SEARs identified environmental impacts of the development to be assessed and specific key issues through assessment of any such impact. The Department has confirmed that the SEARs issued to the original SSD application do not need to be updated as the modifications do not give rise to substantially different environmental issues.

This section assesses the relevant potential environmental impacts of the modifications to the SSD approval.

7.1. BUILT FORM AND URBAN DESIGN

The modifications to the SSD approval comprise minor changes to the internal and external layout and design of Levels 2 and 3 of the approved inpatient building. The changes have resulted from detailed design refinement and are required to meet specific operational requirements of NSW Health Infrastructure.

The revised upper level building floorplates, façade treatment, and internal changes are substantially the same as the SSD approval. The modifications have negligible impact on the setbacks, siting, height and massing of the approved inpatient building and respond appropriately to the prevailing low density residential locality.

The modifications are contained within the approved three-storey built form (with a roof level plant room) and do not exceed the approved building height of 20.3 metres. The extended floorspace at Level 2 will have a height consistent with the approved Level 2 built form; however it will be read in the context of the approved building massing and will not have a detrimental impact on the quality of the building or site in its context.

The additional massing at Level 2 and 3 is minor in the context of the SSD approval. However the appearance will not be visually obtrusive and will be read in the context of the approved building form. The modified proposal presents an orderly and efficient layout and design with minimal built form impacts.

The external materials and finishes selected for the modified building include a mixture of metal cladding, brickwork, and louvres. The materials continue to provide durability and low maintenance. The selected materials and finishes express the form of the modified building and are sympathetic to the local context. The modifications are consistent with the approved materials palette and appearance of the original building.

7.2. VISUAL IMPACTS

This application is supported by revised perspectives of the modified building (provided at **Appendix B**).

The below provides a visual perspectives comparison between the approved and the modified development.

Figure 6 – Bowral Street Perspective



Picture 7 – Approved Development



Picture 8 – Modified Development

Figure 7 – Northeast (Looking West) Perspective



Picture 9 – Approved Development



Picture 10 – Modified Development

Figure 8 – Northwest Corner (Looking East) Perspective



Picture 11 – Approved Development

Source: MSJ Architects



Picture 12 – Modified Development

Figure 9 – Main Entrance Perspective



Picture 13 – Approved Development



Picture 14 – Modified Development

The modified proposal will result in additional mass to the northern portion of the approved inpatient building. The extension to the upper level floorplates will be perceivable from the public domain (notably Bowral Street). However, the additional massing represents a minor increase in bulk and scale and will be read in the context of the approved building mass. The modified building remains below the maximum 20.3 metres approved building height. Therefore there will be minimal visual impacts from the modifications.

The modifications will result in a development that has a design, scale, and form entirely consistent with the approved development, surrounding prevailing Hospital environment, and the wider context.

The modified development is considered to create a low level of visual impact beyond that created by the original development as approved. The significance of the modified visual impact is considered low.

7.3. ENVIRONMENTAL IMPACTS

The proposed modifications will not create any consequential environmental impacts beyond those assessed and determined as acceptable in the SSD approval in relation to tree removal, landscaping, or biodiversity.

No threatened or endangered species are located on the site due to previous built development.

7.4. TRANSPORT AND ACCESSIBILITY

The modifications will not result in an intensification of use or requirement for amendments to the approved car parking provision, vehicular access, pedestrian access, bicycle facilities, operational servicing, or construction access.

The modifications will have negligible impact on traffic generation, congestion, access, or car parking.

7.5. AMENITY IMPACTS

The minor design and built form modifications to the approved inpatient building will have no material impacts on environmental amenity, in relation to solar access, acoustic impacts, visual privacy, view loss, overshadowing, reflectivity from building façades, acoustic impacts, wind impacts, or heritage. The modified proposal continues to provide a high level of environmental amenity for surrounding residential land uses.

7.6. ECOLOGICALLY SUSTAINABLE DEVELOPMENT

The Revised ESD Statement (at **Appendix G**) assesses the ESD commitments of the modifications with specific reference to ESD requirements identified in the SEARs. It concludes that modified development will satisfy recognised-industry best practice standards through inclusion of the ESD initiatives that relate to:

- Building / environmental management;
- Indoor environment quality;
- Energy / greenhouse gas emissions reduction;
- Potable water reduction;
- Sustainable materials; and
- Land use and ecology.

The Statement details the proposed measures that will be implemented into the modified development in order to minimise the consumption of resources, water (including water sensitive urban design), and energy.

The modifications will incorporate suitable measures to achieve positive environmental outcomes via a combined approach to both the NSWHI Engineering Service Guidelines and the design intent of Green Star.

7.7. HERITAGE

The Addendum to the Heritage Impact Statement (at **Appendix D**) assesses the impacts of the modifications on heritage items within the vicinity of the site, being the Bradman Oval, Grandstand and Museum and Bowral Heritage Conservation Area. The Statement concludes that no component of the modifications will have a detrimental impact on the fabric or historic or social significance of the surrounding heritage items, nor any heritage impact on the wider setting. Further, there will be no impact on the historic significance of the Bowral Heritage Conservation Area, and minimal and acceptable heritage impacts on its wider setting.

Notwithstanding that it is not subject to a heritage listing under relevant statutory planning instruments, the site is considered to have local historical and social significance, with particular note to the pre-World War II buildings contained in the site and associated landscaping. The Addendum Statement assesses the impact of the modified development on local significance and concludes that there will be no unacceptable impacts. Potential adverse heritage impacts will be mitigated by the benefits obtained from the provision of services, noting that the works are vital to continue to serve the residents of Bowral and the surrounding district. The social significance of the site is supported and further developed by the proposal (as modified).

7.8. ACCESSIBILITY

The DDA Compliance Statement (at **Appendix I**) concludes that the modifications can readily comply with Access to Premises Standard 2010 and the accessibility provisions of the Building Code of Australia (BCA). Compliance will be achieved with the BCA deemed-to-satisfy provisions and Performance Solutions.

7.9. SOCIAL AND ECONOMIC IMPACTS

The modified development will have a positive economic and social benefit to the local community through better meeting the operational and design requirements of NSW Health Infrastructure. The development as modified will contribute employment opportunities, facilitate the upgrade and redevelopment of out-dated hospital infrastructure, and improve capacity to provide an enhanced range of health and medical services.

The development as modified will result in significant capital investment in public health and medical services and directly benefit the local Bowral community and the wider South West Sydney Local Health District.

8. SECTION 4.15(1) ASSESSMENT

The following sections assesses the proposed modifications against relevant heads of consideration under Section 4.15(1) of the EP&A Act.

8.1. SECTION 4.15(1)(A) – STATUTORY PLANNING CONSIDERATIONS

Section 4.15(1)(a) requires the consent authority to take into consideration:

“(a) *the provisions of:*

- (i) *any environmental planning instrument, and*
- (ii) *any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*
- (iii) *any development control plan, and*
- (iiia) *any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and*
- (iv) *the regulations (to the extent that they prescribe matters for the purposes of this paragraph),*
- (v) *(Repealed)*

that apply to the land to which the development application relates”

In relation to Section 4.15(1)(a)(i), the proposed modifications have been assessed against all relevant environmental planning instruments as detailed in Section 5 of this report.

In relation to Section 4.15(1)(a)(ii), there are no relevant draft environmental planning instruments.

In relation to Section 4.15(1)(a)(iii), notwithstanding that Clause 11 of State Environmental Planning Policy (State and Regional Development) 2011 states that SSD applications are not subject to assessment against development control plans, it is considered that the modifications are generally consistent with the objectives and requirements of Bowral Township DCP.

In relation to Section 4.15(1)(a)(iiia), there are no planning agreements applicable to the modifications.

In relation to Section 4.15(1)(a)(iv), all relevant regulations have been considered in the preparation of this modification application.

8.2. SECTION 4.15(1)(B) – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS

Section 4.15(1)(b) requires the consent authority to take into consideration:

“(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”*

The potential impacts of the proposed modifications have been assessed in detail in Section 7 of this Report and within the supporting specialist consultant documentation.

Overall the environmental impacts created by the proposed modifications are minor and acceptable in the context of the site and the approved development. The modified proposal to contribute to local employment growth and the provision of first class health facilities for the South Western Sydney Local Health District.

8.3. SECTION 4.15(1)(C) – SUITABILITY OF THE SITE

Section 4.15(1)(c) requires the consent authority to take into consideration:

“(c) *the suitability of the site for the development”*

The land to which the proposed modifications relates is the same site to which SSD 8980 relates and therefore remains suitable for the development as proposed to be modified.

8.4. SECTION 4.15(1)(D) – SUBMISSIONS

Section 4.15(1)(d) requires the consent authority to take into consideration:

“(d) any submissions made in accordance with this Act or the regulations”

Submissions received to the public notification of this modification application must be considered in accordance with the EP&A Act. The Applicant will provide a response to relevant submissions.

8.5. SECTION 4.15(1)(E) – THE PUBLIC INTEREST

Section 4.15(1)(e) requires the consent authority to take into consideration:

“(e) the public interest”

The proposed modifications will result in minor modifications to an approved development that has significant social and economic benefits for the local community. It is anticipated that the modified development will have negligible environmental impacts and will remain in the public interest.

9. CONCLUSION

This Environmental Assessment Report supports an application to modify SSD approval 8980 as it relates to the redevelopment of the Bowral and District Hospital. The proposed modifications relate to minor design amendments to Levels 2 and 3 of the approved three-storey inpatient building. The requirement for design changes has emerged to align with the operational requirements of NSW Health Infrastructure.

Pursuant to Section 4.55 of the EP&A Act, the modified proposal has been assessed as generating minor and acceptable environmental impacts and will result in a development that is substantially the same as the approved development under the original SSD consent.

This Report demonstrates that the proposed modifications will not result in significant impacts in addition to or above those originally assessed and determined by the Department in terms of environmental, economic and social impacts. Accordingly it is recommended that approval be granted to this modification application.

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