



Campbelltown Hospital Redevelopment Stage 2

State Significant
Development
Assessment
(SSD 9241)



January 2019

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Cover photo

Photomontage of the proposal as viewed from the south-west (Source: Response to Submissions 2018)

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Glossary

Abbreviation	Definition
AA	Acoustic Assessment
AHD	Australian Height Datum
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act 2016
BCA	Building Code of Australia
CASA	Civil Aviation Safety Authority
CIV	Capital Investment Value
Consent	Development Consent
Council	Campbelltown City Council
CEEC	Critically Endangered Ecological Community
CDCP	Campbelltown (Sustainable City) Development Control Plan 2015
CLEP	Campbelltown Local Environmental Plan 2015
CNVMP	Construction Noise and Vibration Management Plan
CTMP	Construction Traffic Management Plan
Department	Department of Planning and Environment
DSI	Detailed Site Investigation
EEC	Endangered Ecological Community
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
GA NSW	Government Architect NSW
GTP	Green Travel Plan
LEP	Local Environmental Plan
Minister	Minister for Planning
NSW RFS	New South Wales Rural Fire Service
NPI	Noise Policy for Industry
OEH	Office of Environment and Heritage
Planning Secretary	Secretary of the Department of Planning and Environment
PMF	Probable Maximum Flood
RL	Relative Level

RMS	Roads and Maritime Services
RtS	Response to Submissions
SEARs	Planning Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
TEC	Threatened Ecological Community
TIA	Traffic Impact Assessment



Executive Summary

This report provides an assessment of a state significant development (SSD) application for the Campbelltown Hospital Redevelopment Stage 2 (SSD 9241), located at Therry Road, Campbelltown. The Applicant is Health Infrastructure and the proposal is located within the City of Campbelltown (Council) Local Government Area.

The proposal seeks approval for the construction and operation of Stage 2 of the redevelopment of Campbelltown Hospital. The redevelopment involves the demolition of a number of existing structures, construction of a new 13 storey Clinical Services Building (CSB) with rooftop helipad, a new multi-storey connection (hospital spine) between the main hospital buildings and associated works including alterations to access and parking, tree removal and landscaping.

The proposal has a capital investment value (CIV) of \$598 million and would generate up to 350 construction jobs and 418 full time equivalent operational jobs. The proposal is SSD under clause 14 of the State Environmental Planning Policy (State and Regional Development) 2011, as it is development for the purpose of a hospital with a CIV of more than \$30 million. Therefore, the Minister for Planning is the consent authority.

The application was publicly exhibited for 28 days between 30 August 2018 and 26 September 2018 (inclusive). The Department of Planning and Environment (the Department) received a total of eleven submissions, including ten from public authorities (including Council), and one from the public. No objections were received. An additional six submissions from public authorities (including Council) were received in response to the Applicant's Response to Submissions (RtS).

The key issues raised in the submissions include built form and urban design, traffic, parking, noise and vibration.

The Department has considered the above issues in its assessment along with other impacts. The Department has considered the merits of the proposal in accordance with relevant matters under section 4.15(1), the objects of the *Environmental Planning and Assessment Act 1979*, the principles of ecologically sustainable development, and issues raised in all submissions as well as the Applicant's response to these.

The Department's assessment of the project concludes that:

- the proposed built form and scale is acceptable in the context of the existing development on and surrounding the site, the operational needs of the hospital, the regional importance of the facility and proximity of the site to Campbelltown city centre.
- the surrounding road network has adequate capacity to cater for the expected increase in traffic to the site and proposed changes to the site's access arrangements would be acceptable.
- sufficient car parking would be provided on site to accommodate staff, outpatients and visitors.
- appropriate mitigation measures have been proposed to minimise noise and vibration impacts on surrounding residential properties.

In addition, the proposal would offer significant public benefits in terms of the provision of health care and employment in the Campbelltown / Macarthur region and is consistent with key government strategic plans and policies, including State Infrastructure Strategy 2018-2038, Greater Sydney Regional Plan: A Metropolis of Three Cities and Greater Sydney Commission's Western City District Plan.

The Department concludes the proposal is in the public interest and recommends that the application be approved subject to conditions.



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1. Introduction

This report provides an assessment of a state significant development (SSD) application for the Campbelltown Hospital Redevelopment Stage 2 at Therry Road, Campbelltown (SSD 9241).

The proposal seeks approval for the construction and operation of Stage 2 of the redevelopment of Campbelltown Hospital. The redevelopment involves the demolition of existing structures, construction of a new 13 storey Clinical Services Building (CSB) with rooftop helipad, a new multi-storey connection (hospital spine) between the main hospital buildings and associated works including alterations to access and parking, tree removal and landscaping.

The application has been lodged by Health Infrastructure (the Applicant). The site is located within the City of Campbelltown (Council) local government area (LGA).

1.1 Site description

Campbelltown Hospital (the site) is located approximately 500 metres south-west of Campbelltown central business district (CBD) which itself is located approximately 51 kilometres south-west of Sydney CBD. The hospital campus is approximately 19.33 hectares in size and is bounded by Appin Road to the east, Therry Road to the south and Marsden Park / Parkside Crescent to the west. The location of the site is shown in **Figure 1**.

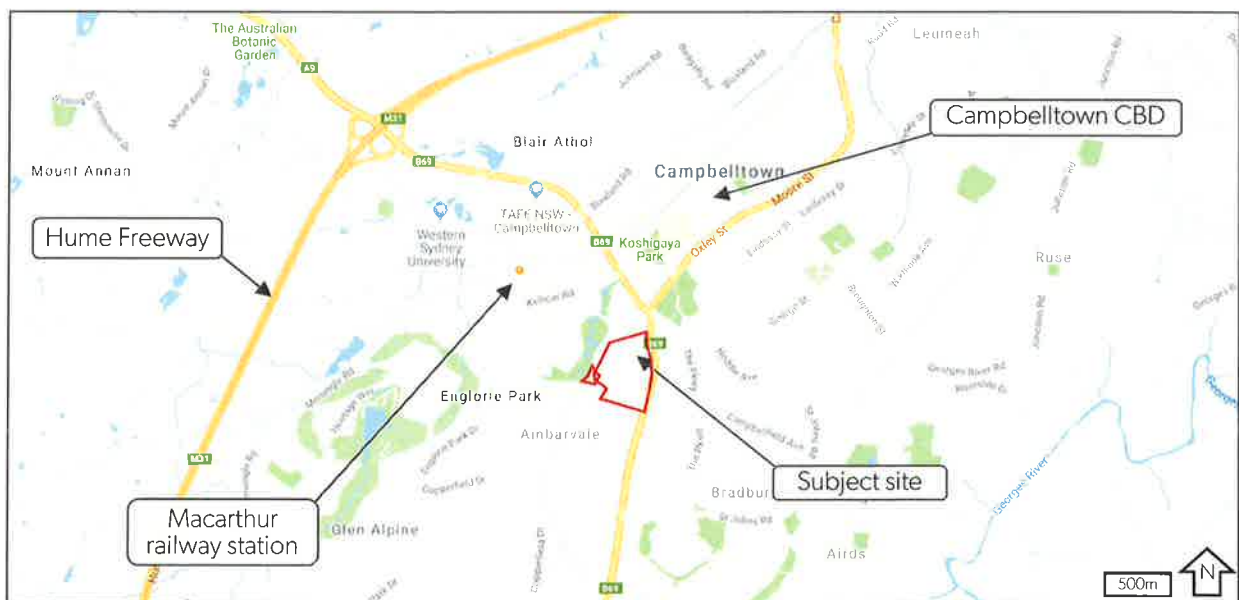


Figure 1 | Regional context map (Base source: Google Maps 2018)

Campbelltown Hospital comprises a 417-bed major metropolitan hospital incorporating a mental health in-patient service and a teaching campus for the Western Sydney University Macarthur Clinical School. The hospital provides a range of emergency, medical, surgical, maternity, intensive care, renal and other health services across the South Western Sydney Local Health District.

The hospital campus contains several interconnected main buildings known as Buildings A, B, C and D, along with several small and associated buildings scattered across the hospital site. The main entry to the hospital is located between Buildings A and B, while the emergency department and emergency drop-off is located at the western end of Building A. A NSW Ambulance station is located to the west of Central Road and south of Parkside Crescent.

An aerial view of the site and surrounds is shown in **Figure 2** and a plan showing the existing buildings and uses on site is shown in **Figure 3**.



Figure 2 | Aerial view of site and surrounds (Source: Nearmap 2018)

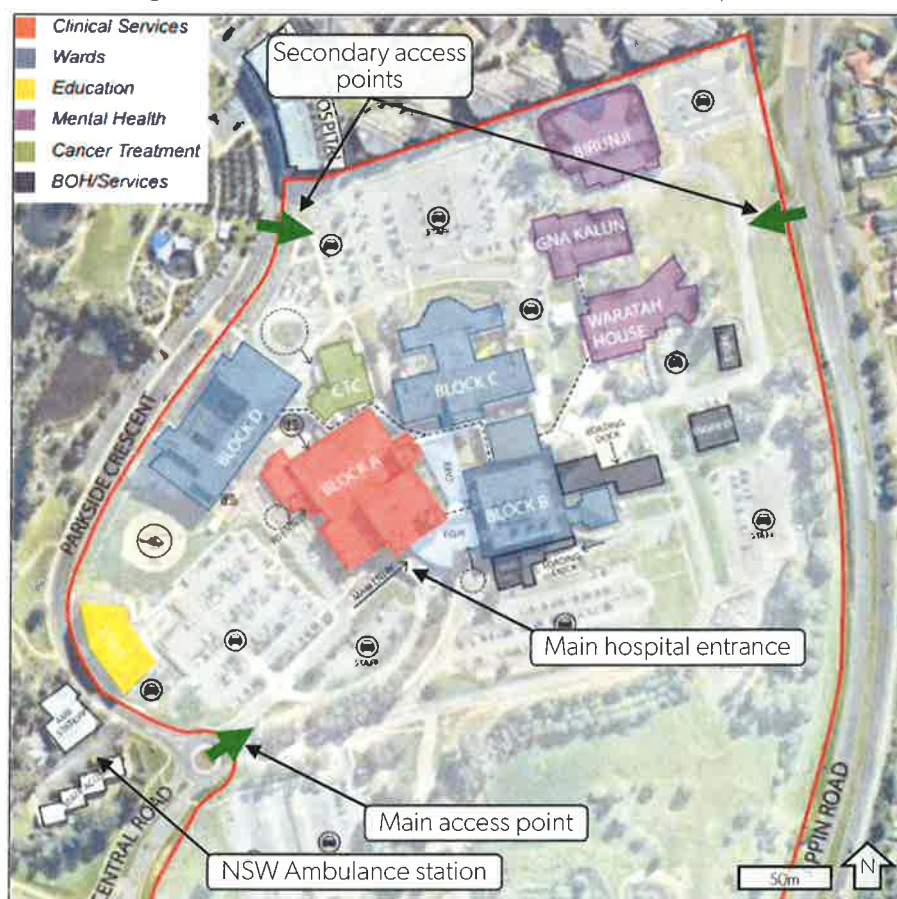


Figure 3 | Existing buildings and uses on site (Source: Applicant's EIS 2018)

The main vehicular access to the site is via Therry Road and Central Road from the south of the site. Secondary access is available from Parkside Crescent in the north-west corner of the site and from Appin Road in the north-east corner of the site. The site itself contains an access road network which connects a series of carparks across the site and the loading dock on the north-eastern side of Building B. At the time of writing this report, the site contained 1456 car parking spaces. A helipad is also located on the western boundary of the site between Building D and the Macarthur Clinical School.

The site generally slopes downward from the south-east corner to the north-west corner of the site. The south-east corner of the site, which is the steepest part of the site, is largely undeveloped, and is grassed with scattered trees.

1.2 Surrounding development

Land to the east and north-east of the site, on the opposite side of Appin Road, and to the south of the site, on the opposite side of Therry Road, is used for low density housing. Marsden Park and medium density housing are located to the west and north-west of the site. Campbelltown Private Hospital and a seniors' living development is located to the north of the site.

Macarthur railway station is approximately 1 kilometre to the west of the site. Several local bus routes service the site, stopping at a bus bay near to the main entrance of the hospital.



2. Project

2.1 Key components and features

The key components and features of the proposal, as refined in the Response to Submissions (RtS), are provided in **Table 1** and are shown in **Figures 4** to **11**.

Table 1 | Main components of the project

Aspect	Description
Project Summary	Construction and operation of Stage 2 of the redevelopment of Campbelltown Hospital involving the demolition of existing structures, construction of a new 13 storey CSB with rooftop helipad, a new multi-storey connection (hospital spine) between the main hospital buildings providing a new connection between the main hospital buildings, and associated works including alterations to access and parking, tree removal and landscaping
Demolition	<ul style="list-style-type: none">• Demolition of low scale elements of Buildings A, B and C to accommodate the new building and proposed hospital spine• Demolition of existing accessways and parking to allow for the new building, access roads and parking
Built form	<ul style="list-style-type: none">• New 13 storey building with two levels partially below ground and a rooftop helipad• New multi-storey weather protected connection (hospital spine) between the new building and existing Buildings A, B and C
Site area	<ul style="list-style-type: none">• Existing hospital campus - 19.33 hectares
Gross floor area (GFA)	<ul style="list-style-type: none">• 58,535 square metres
Uses	<ul style="list-style-type: none">• CSB containing:<ul style="list-style-type: none">○ Emergency department○ Operating theatres○ Intensive care unit○ Mental health unit○ Birthing and speciality care nursery○ Surgical and medical beds○ Helipad facilities○ Ambulance bay
Vehicular access	<ul style="list-style-type: none">• New secondary access road connecting to Therry Road• New access road connecting to Appin Road to replace an existing connection

	<ul style="list-style-type: none"> • New dedicated access road for ambulances providing access to the emergency department ambulance bay
Car parking	<ul style="list-style-type: none"> • 271 at-grade parking spaces to be removed • 52 new at-grade replacement spaces to be provided resulting in a total of 1865 spaces on site, representing an increase of 409 spaces above the number of spaces on site at the time of writing this report
Bicycle parking	<ul style="list-style-type: none"> • 10 existing bicycle parking spaces to be maintained • End-of-trip facilities to be provided
Tree removal and landscaping	<ul style="list-style-type: none"> • 31 trees to be removed • Landscaping to be undertaken at the main entrance, emergency department entrance, adjacent to the hospital spine and along new access roads and car parking
Hours of operation	<ul style="list-style-type: none"> • 24 hours per day, 7 days per week
Jobs	<ul style="list-style-type: none"> • Up to 350 construction jobs and 418 operational jobs
CIV	\$598 million

2.2 Construction works

The main components of construction work include the demolition of a number of existing structures and preparatory earthworks followed by the construction of the new 13 storey building and hospital spine. Works would be undertaken in a way that would allow for the continued operation of the hospital. The buildings and other structures to be demolished are shown in **Figure 4**.

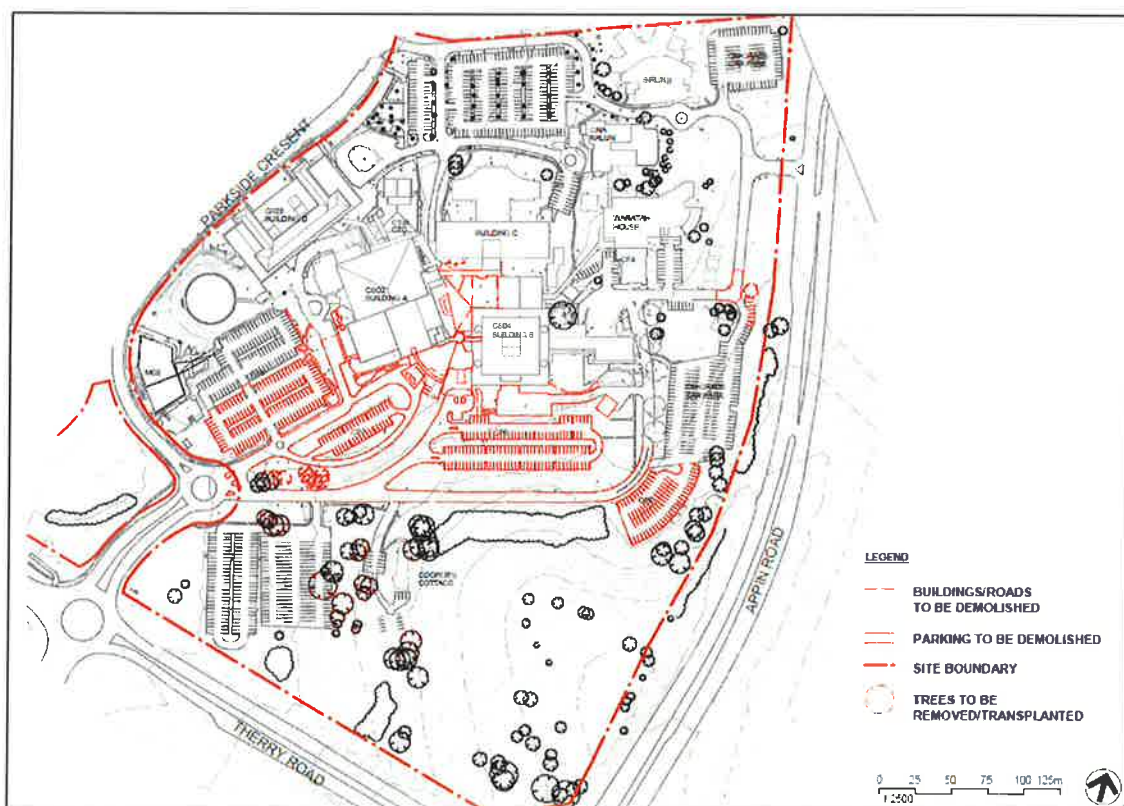


Figure 4 | Demolition plan (Source: Applicant's RfS 2018)

2.3 Physical layout and design

The proposed new building would be located within the centre of the hospital campus, immediately south of existing Buildings A and B. The proposed hospital spine would be constructed to the north of the building, providing a weather protected connection to Buildings A, B and C.

The new main entrance to the hospital is proposed to be located in the centre of the southern elevation of the building immediately south of the hospital spine. The emergency department entrance would be located in the centre of the western elevation of the building with the ambulance bay located in the north-western corner.

A new one-way access road is proposed along the southern side of the building with a public drop-off area and public bus stop immediately adjacent to the main entrance. A pedestrian bridge would be constructed across this road to provide access to at-grade carparks located on the southern side of the road.

A reconfigured emergency department drop-off and carpark would be provided at the western end of the proposed building adjacent to the entrance to the emergency department. The ambulance access road is proposed to run to the north-west of this carpark to the ambulance bay.

The new access to Appin Road would be located in the north-east corner of the site, just south of the existing connection which would be removed. The proposed second access to Therry Road would be located in the south-west corner of the site.

The proposed site layout is shown in **Figure 5** and plans and elevations of the proposed building are shown in **Figures 6 to 11**.

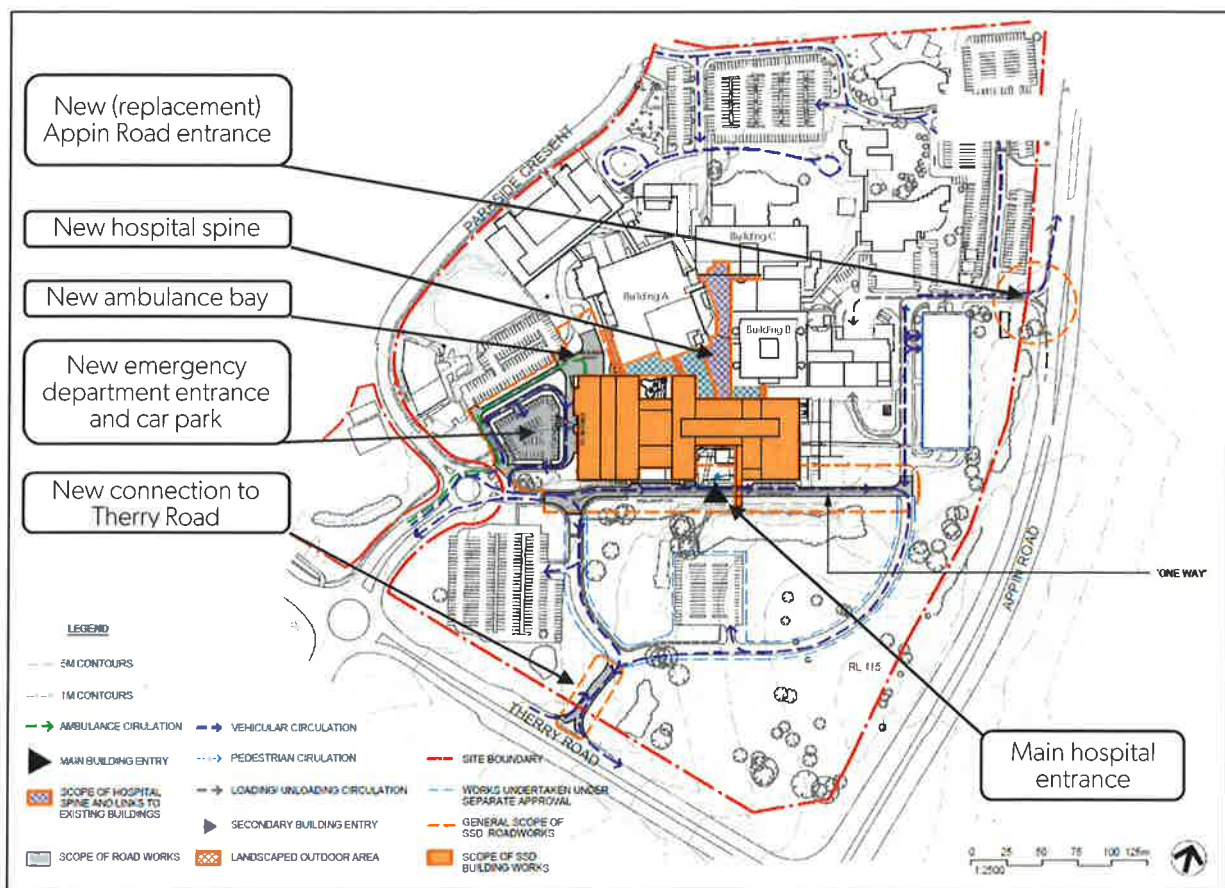


Figure 5 | Proposed site plan (Source: Applicant's RtS 2018)

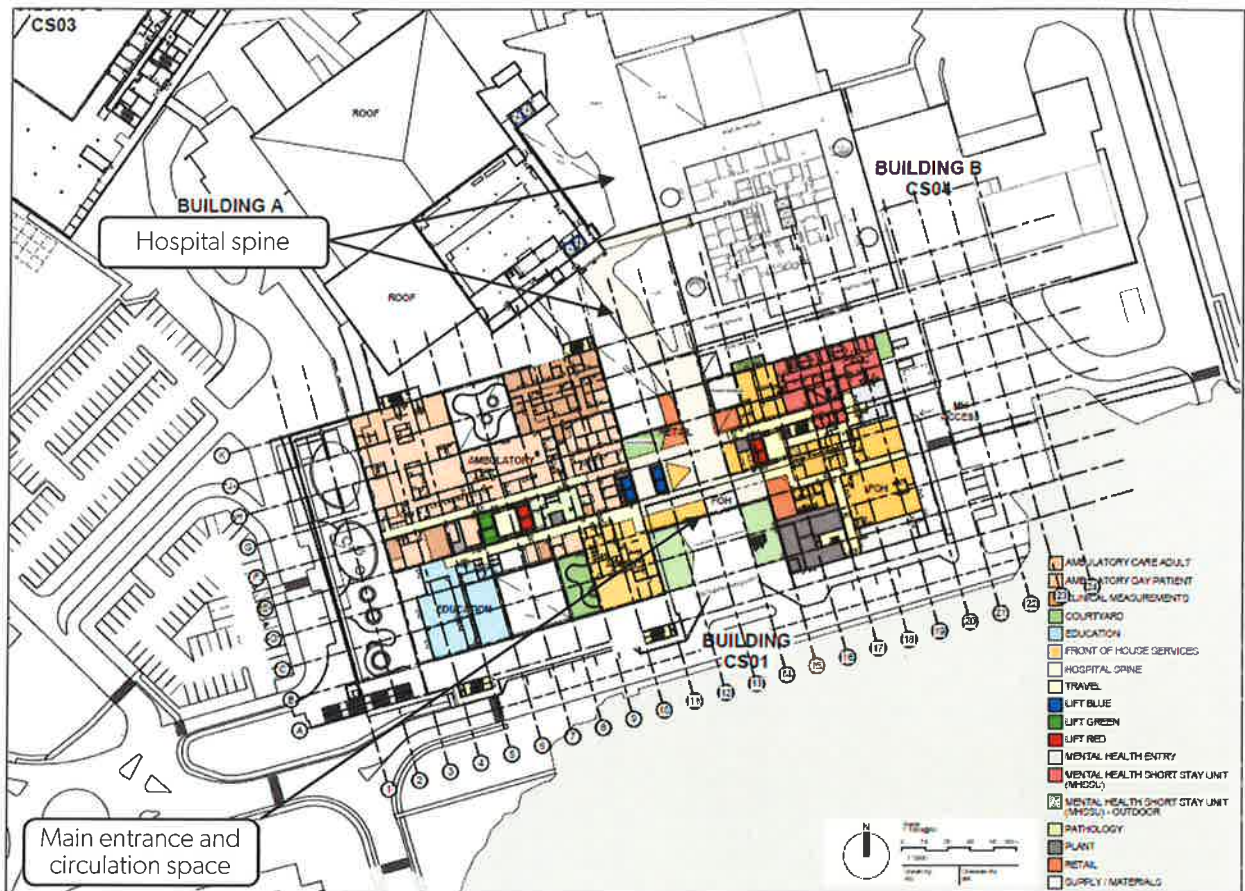


Figure 6 | Level 02 layout plan (Source: Applicant's RtS 2018)



Figure 7 | Southern elevation (Source: Applicant's RtS 2018)



Figure 8 | Western elevation (Source: Applicant's RtS 2018)

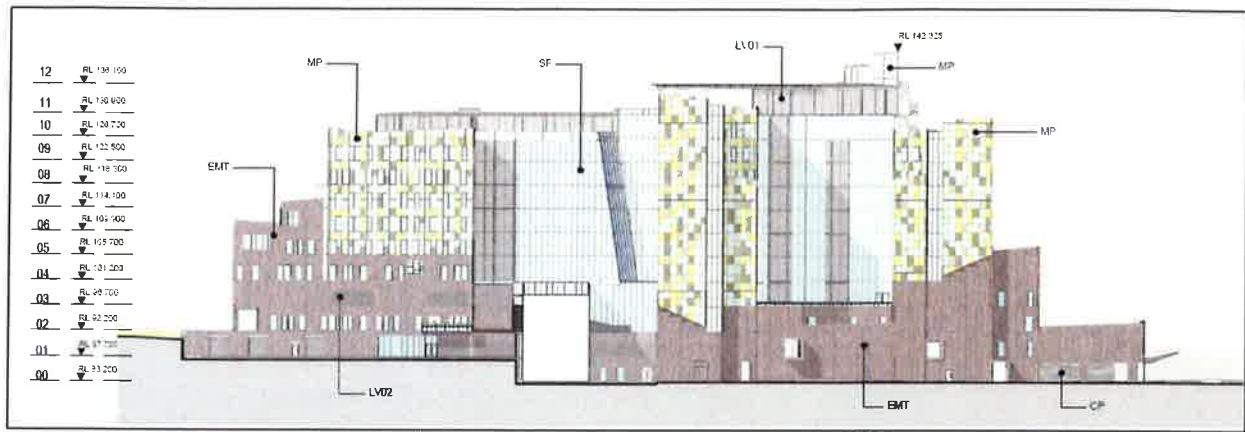


Figure 9 | Northern elevation (Source: Applicant's RtS 2018)

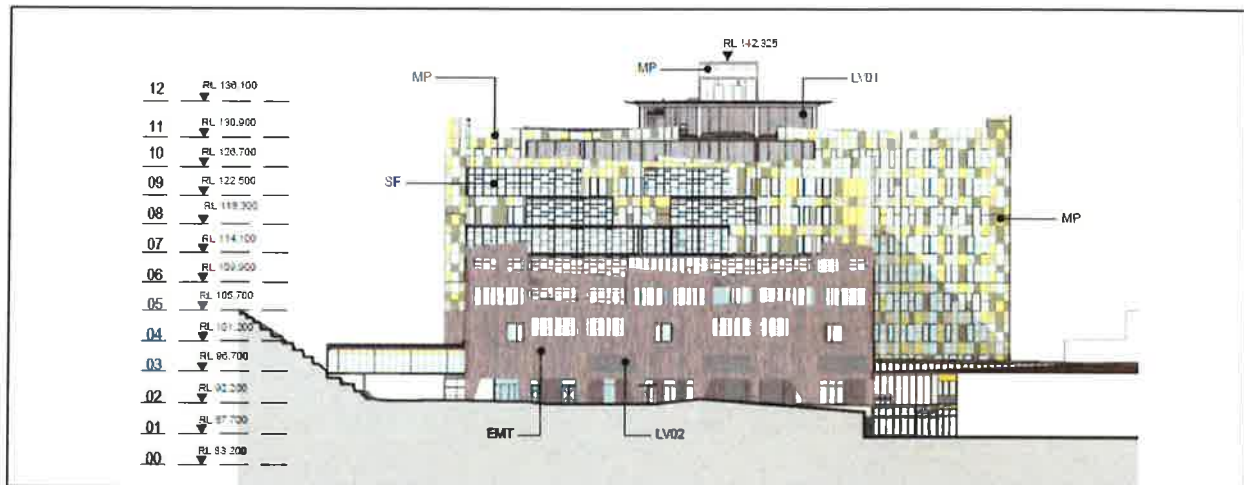


Figure 10 | Eastern elevation (Source: Applicant's RtS 2018)

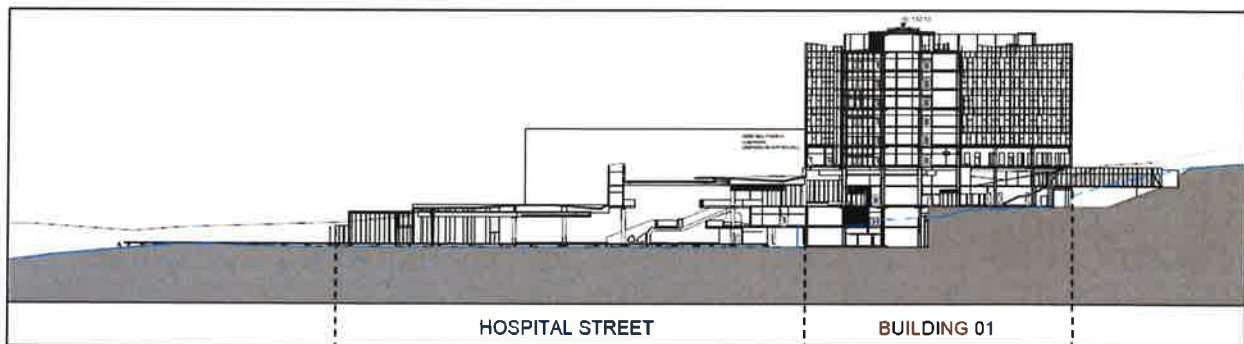


Figure 11 | Section running north-south through proposed building and hospital spine (Source: Applicant's RtS 2018)

2.4 Timing

The construction of the building would be undertaken in a single stage with construction works expected to be completed in 2022.

2.5 Related development

The redevelopment of Campbelltown Hospital is being carried out over several stages with works undertaken under different approval pathways. The existing and proposed works known at the time of writing this report are summarised in **Table 2** and are illustrated in **Figure 12**.

Table 2 | Other works on site and approval pathways

Stage / element	Summary of works	Approval details / status
Stage 1	Acute Health Services Building located in the south-eastern corner of the site between Parkside Crescent and Building A.	An SSD approval (SSD 5003) was issued by the Executive Director Major Projects Assessments, as delegate for the Minister for Planning, on 21 November 2012. The building has since been constructed and is operating on site.
Multi-storey carpark	A multi-storey carpark proposed on the eastern boundary of the site providing 810 additional parking spaces.	Development consent (4141/2017/DA-C) was issued by the Council on 22 August 2018. Construction has commenced on site.
At-grade carparks	Demolition of carparks 5 and 5A in the north-eastern corner of the site and construction of new carparks in the general location as those removed and in the south-western corner of the site.	The works were approved under Part 5 of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act). Works have partly been completed with the remaining works currently underway.
Loading dock & kitchen	Upgrade of the central loading dock and kitchen located on the eastern side of Building B.	The works are to be facilitated under Part 5 of the EP&A Act.
Internal link road	<p>A new east-west internal access road to the south of the main hospital buildings and alterations to car parking, including:</p> <ul style="list-style-type: none"> reconfiguration of the existing at-grade carpark adjacent to the Central Road roundabout. construction of a new at-grade carpark to the south of the new east-west access road. 	The works are to be facilitated under Part 5 of the EP&A Act. The road is expected to be delivered prior to the commencement of construction of the new building proposed in the current SSD application.

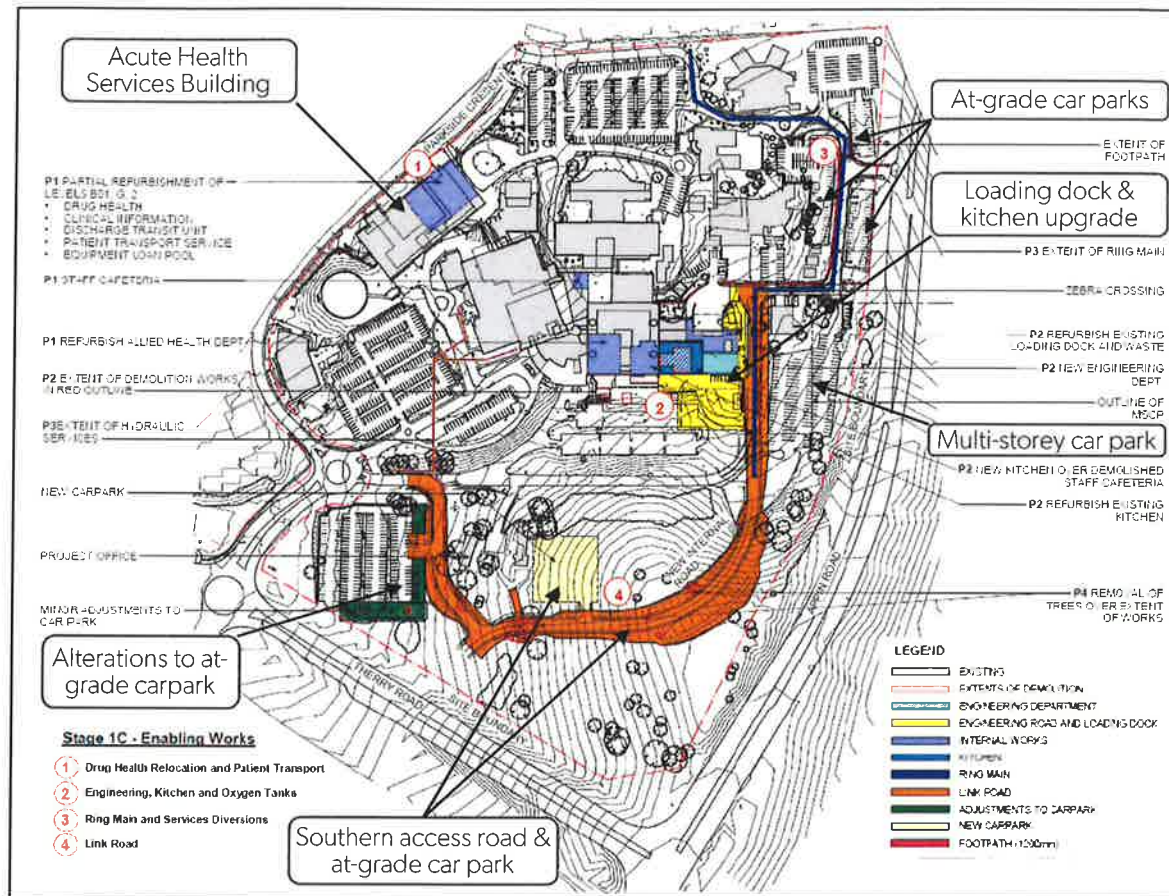


Figure 12: Other works on site (Applicant's RtS 2018)



3. Strategic Context

Campbelltown Hospital is part of the South Western Sydney Local Health District and provides health services to residents in the Macarthur region. The Applicant states that the proposed redevelopment is required to provide capacity to meet the increasing health service demands of a growing and changing population. Campbelltown's population is expected to grow from 163,000 people in 2018 to 273,000 in 2036. This will involve a 144 per cent increase in residents aged over 70 years and a 58 per cent increase in children aged up to 14 years.

The proposal seeks to:

- increase the provision of services to meet the significant growth in population, changing age profile and increase in complexity of disease and poor health in the region.
- improve service access and patient flows.
- address high rates of preventable hospitalisation, particularly through the increase of mental health, maternity, cancer, renal, ambulatory care and outpatient services.
- improve self-sufficiency of the hospital and local health district, particularly regarding the provision of acute medical and surgical services which currently require residents to travel out of the region for 40 per cent of their inpatient care and 50 per cent of surgical care.

The Department considers that the proposal is appropriate for the site given:

- it is consistent with the Greater Sydney Regional Plan: A Metropolis of Three Cities as the development provides new and improved health infrastructure to service Sydney's growing population within an identified strategic centre.
- it is consistent with the vision outlined in the Greater Sydney Commission's Western City District Plan, as it would provide significantly improved health infrastructure with a designated health and education precinct.
- it is consistent with the NSW Future Transport Strategy 2056 as it provides improved health facilities within a strategic centre.
- it is consistent with State Infrastructure Strategy 2018 – 2038: Building the Momentum as it facilitates investment in health infrastructure to support a growing and ageing population.
- it would provide direct investment in the region in the order of \$598 million, which would support up to 350 construction jobs and 418 new operational jobs.



4. Statutory Context

4.1 State significant development

The proposal is SSD under section 4.36 of the EP&A Act (development declared SSD) as the development has a CIV in excess of \$30 million and is for the purpose of a hospital under clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP).

The Minister is the consent authority under section 4.5 of the EP&A Act. In accordance with the then Minister for Planning's delegation to determine SSD applications signed on 11 October 2017, the Executive Director, Priority Projects Assessments may determine this application as:

- the relevant Council has not made an objection.
- there are less than 25 public submissions in the nature of objection.
- a political disclosure statement has not been made.

4.2 Permissibility

The site is located within the SP2 Infrastructure – Health Services Facilities zone under the Campbelltown Local Environmental Plan 2015 (CLEP). A hospital is permissible with consent within the zone. Therefore, the Minister for Planning or a delegate may determine the carrying out of the development.

4.3 Other approvals

Under section 4.41 of the EP&A Act, a number of other approvals are integrated into the SSD approval process, and consequently are not required to be separately obtained for the proposal. In addition, under section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any development consent for the proposal (e.g. approvals for any works under the *Roads Act 1993*).

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

4.4 Mandatory matters for consideration

Environmental planning instruments

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

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

Objects of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent / approval) are to be understood as powers to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at **Table 3**.

Table 3 | Response to the objects of section 1.3 of the EP&A Act

Objects of the EP&A Act	Consideration
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources	The development would ensure the proper management and development of suitably zoned land for the social welfare of the community and state. The improved health care facilities would provide significant social and economic benefits to the community.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development (ESD) (see below).
(c) to promote the orderly and economic use and development of land,	The development would meet the objectives of the zone to provide health infrastructure. The redevelopment of part of the existing hospital campus to intensify the use would also be of economic benefit through job creation and infrastructure investment.
(d) to promote the delivery and maintenance of affordable housing,	Not applicable.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposed development would not result in the loss of any threatened or vulnerable species, populations, communities or significant habitats.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The proposed development is not anticipated to result in any impacts upon built and cultural heritage, including Aboriginal cultural heritage. See Section 6.4 .
(g) to promote good design and amenity of the built environment,	The proposal has been reviewed by the Government Architect NSW (GA NSW) throughout the assessment of the proposed development. The Department considers the application would provide for good design and amenity of the built environment (refer to Section 6).
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The Department has considered the proposed development and has recommended a number of conditions of consent to ensure the development is undertaken in accordance with legislation,

guidelines, policies and procedures (refer to **Appendix C**).

- | | |
|---|--|
| (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State, | The Department publicly exhibited the proposal (Section 5.1), which included consultation with Council and other public authorities and consideration of their responses. |
| (j) to provide increased opportunity for community participation in environmental planning and assessment. | The Department publicly exhibited the proposal (see Section 5.1), which included notifying adjoining landowners, placing a notice in newspapers and displaying the proposal on the Department's website and at Council during the exhibition period. |

Ecologically sustainable development

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

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

The development proposes ESD initiatives and sustainability measures in accordance with the NSW Health Engineering Services Guidelines which will target a 4 Star Green Star equivalency rating. This will include consideration of:

- reduced energy use targeting a 10 per cent improvement on National Construction Code – Section J energy efficiency standards.
- passive design strategies, demand management and life-cycle sustainability and maintenance implications.
- water conservation measures, including highly efficient water fittings and fixtures, water recycling and rainwater harvesting.
- use of locally-sourced, low-energy or recycled materials.

The Department has considered the proposed development in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the proposed development. To ensure that appropriate ESD measures are incorporated into the proposed development, the Department has recommended conditions requiring certification of a minimum 4 Green Star rating from the Green Building Council Australia or adoption of ESD measures equivalent to an accredited rating scheme to the satisfaction of the Planning Secretary. Subject to these conditions, the proposed development is consistent with ESD principles as described in Appendix Y of the Applicant's EIS, which has been prepared in accordance with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

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

Environmental Planning and Assessment Regulation 2000

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

Planning Secretary's Environmental Assessment Requirements

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

Section 4.15(1) matters for consideration

Table 4 identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided for in **Section 6** (Assessment) and relevant appendices or other sections of this report and EIS, referenced in the table.

Table 4 | Section 4.15(1) matters for consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	The application satisfactorily complies. The Department's consideration of the relevant EPIs is provided in Appendix B of this report.
(a)(ii) any proposed instrument	The application satisfactorily complies with the relevant draft EPIs (see Appendix B).
(a)(iii) any development control plan (DCP)	Under clause 11 of the SRD SEPP, DCPs do not apply to SSD. Notwithstanding this, consideration has been given to relevant DCPs at Appendix B .
(a)(iiia) any planning agreement	Not applicable.
(a)(iv) the regulations <i>Refer Division 8 of the EP&A Regulation</i>	The application satisfactorily meets the relevant requirements of the EP&A Regulation, including the procedures relating to applications (Part 6 of the EP&A Regulation), public participation procedures for SSD and Schedule 2 of the EP&A Regulation relating to EIS.
(b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	The impacts of the proposed development have been appropriately mitigated or conditioned - refer to Section 6 .
(c) the suitability of the site for the development	The site is suitable for the development as discussed in Sections 3, 4 and 6 .
(d) any submissions	Consideration has been given to the submissions received during the exhibition period. See Sections 4 and 5 .
(e) the public interest	The proposed development is in the public interest. Refer to Section 6 .

Biodiversity Conservation Act 2016

Under section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act), SSD applications are to be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

The impact of the proposal on biodiversity values has been assessed in the BDAR accompanying the EIS and considered in **Section 6** of this report.

5. Engagement

5.1 Department's engagement

In accordance with Schedule 1 of the EP&A Act, the Department publicly exhibited the application for a period of 28 days from 30 August 2018 until 26 September 2018. The application was exhibited at the Department and on its website, at the NSW Service Centre and at Council's office.

The Department placed a public exhibition notice in the Campbelltown Macarthur Advertiser on 29 August 2018 and notified adjoining landholders and relevant state and local government authorities in writing. The Department representatives visited the site to provide an informed assessment of the development.

The Department has considered the comments raised in the public authority and public submissions during the assessment of the application (**Section 6**) and / or by way of recommended conditions in the instrument of consent at **Appendix C**.

5.2 Summary of submissions

The Department received a total of eleven submissions, comprising 10 submissions from public authorities, including Council, and one submission from the public. No objections were received. A summary of the issues raised in the submissions is provided in **Section 5.3** and **5.4** and copies of the submissions in **Appendix A**.

5.3 Public authority submissions

A summary of the issues raised in the public authority submissions is provided at **Table 5** below and copies of the submissions in **Appendix A**.

Table 5 | Summary of public authority submissions to the EIS exhibition

Council

Council advised that it strongly supports the proposal and offered the following comments:

- The expansion of the hospital would bring significant social and economic benefits to the community that would be a catalyst project that would give significant weight to the revitalisation of Campbelltown CBD and reinforce its identity as the metropolitan centre of the Campbelltown / Macarthur and wider southern region.
- The proposal is in line with Council's recent strategic planning for the area including Re-imagining Campbelltown CBD, particularly with regard to the area becoming a leading centre of health services, medical research and medical technology activity.
- Built form and its relationship with the surrounding green and rolling hills, achievement of architectural excellence and sustainable development is extremely important to Council.
- The use of sustainable strategies is strongly encouraged.
- The proposal has been carefully considered and has addressed many complex and competing matters on the site including customer experience, access and service requirements.
- Whilst the building would be larger in proportion that would be expected for the site, the design has resulted in a proportioned built form response.

-
- Treatment of facades and materials proposed for the three main building elements is supported, however some of the proposed elements are not readily apparent in the detail provided in the EIS. It is recommended that façade design be revised with more emphasis on vertical elements particularly for the finger points of the building in order to facilitate a hierarchy of façade treatment. The proposed night time lighting is integral to this.
 - It is noted that while the building would be in the order of 10-12 stories, the actual building height would be more akin to an 18 storey building due to higher floor heights proposed.
 - Given the overall height, the building would dominate the landscape. Façade treatment is therefore of considerable importance and should be in line with the community's desire for inclusion of green walls and design elements that soften the buildings impact in the landscape.
 - The night time treatment (i.e. lighting) of the building should not draw the viewer's eye to the overall bulk and scale. Instead, it should seek to establish the building as an important place identifier in the night time landscape, that can be celebrated by its individuality in a night time backdrop while being respectful of the sensitive suburban and rolling hills environment. Further engagement with Council on the design is therefore requested.

Air Services Australia

Air Services Australia advised that the proposal would not affect relevant airspace procedures or communication, navigation or surveillance facilities.

Civil Aviation Safety Authority (CASA)

CASA offered the following comments / recommendations:

- The site is located outside of the obstacle limitation surfaces for Camden Aerodrome.
- The Applicant should consider CASA and International Civil Aviation Organization guidance in relation to the proposed helicopter landing site and consult with helicopter operators in relation to the proposed design and the ongoing operation of the existing helipad on site during construction works.

Environment Protection Authority (EPA)

EPA made the following comments / recommendations:

- Contaminated land investigations undertaken as part of the EIS do not meet the requirements of EPA sampling guidance – further investigations are therefore recommended having regard to the number of samples undertaken on site and the depth of samples.
- The proposed extended construction hours for weekday mornings and Saturdays are not supported on the basis of the justification provided in the EIS - standard construction hours should therefore apply.
- Appropriate arrangements should be implemented during construction and operation with regard to:
 - investigation and management of potential site contamination following demolition of existing structures.
 - management of asbestos and other hazardous (including clinical) waste.
 - noise management.
 - erosion, sediment and dust controls.
 - management of on site emergency back-up generators and fuel storage systems.
 - radiation control associated with medical equipment and therapies.
 - implementation of sustainability measures.

Endeavour Energy

Endeavour Energy advised that it is aware of the proposed development and is working with the Applicant with regard to connection to the electricity supply network.

Office of Environment and Heritage (OEH)

OEH made the following comments / recommendations:

- Conditions be imposed in relation to unexpected finds of Aboriginal objects or ancestral remains.
- The BDAR did not include an assessment of Serious and Irreversible Impacts as required in the Biodiversity Assessment Method (BAM).
- Surveys carried out to determine the presence of *Pimelea spicata* (Spiked Rice-flower) on site were not undertaken at a time when specimens would be easily found.
- Additional flood modelling identified for the Stage 2 detailed studies, including utilising TUFLOW and Council's updated flood model, should be undertaken in early planning stages to inform decision-making.
- An emergency response plan should be prepared to manage floods larger than the 1 per cent average exceedance probability (AEP) up to the probable maximum flood (PMF).

Heritage Division

The Heritage Division noted that there are no items listed on the State Heritage Register within the site or within the vicinity of the development works which may be impacted by the proposal. A condition was recommended in relation to procedures if unexpected archaeological relics are found on site.

NSW Rural Fire Service (NSW RFS)

The NSW RFS made the following recommendations:

- Water, electricity and gas must comply with sections 4.13 and 4.2.7 of Planning for Bush Fire Protection 2006 (NSW RFS).
- A bush fire evacuation and emergency management plan should be prepared for the hospital.

Roads and Maritime Services (RMS)

RMS advised that the traffic impact assessment report submitted with the EIS should give further consideration to a number of matters, including consideration of other developments in the area, need for road improvement works as a result of the proposed development, internal circulation patterns, light and heavy vehicle movements, car parking provision, positioning of the Appin Road entry connection and proposed RMS upgrades to the Narallen Road / Appin Road intersection.

RMS also provided recommended conditions setting out design requirements for the proposed connection to Appin Road, including replacement of the proposed acceleration lane with a high-angle exit.

Transport for NSW (TfNSW)

TfNSW made the following comments / recommendations:

- Information is requested in relation to proposed internal road widths and capacity of these to accommodate bus services as proposed in the EIS.

- Wayfinding strategies be implemented to assist with the increase in mode share of walking and cycling to the site by staff, outpatients and visitors.
- A construction management plan be developed to ensure pedestrian movements are maintained or appropriately diverted where affected by works.

5.4 Public submissions

The one public submission received considered that the expansion of the hospital is very positive for the region. Concern however was raised in relation to perceived inadequate car parking provision on the site and the failure of the proposal to include the construction of a multi-storey carpark. A copy of the submission may be viewed at **Appendix A**.

5.5 Response to Submissions

Following the exhibition of the application the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised in the submissions.

On 12 November 2018, the Applicant provided an RtS (**Appendix A**) on the issues raised during the exhibition of the proposal. This included the following:

- Amended Architectural Plans
- Amended Landscape Plans
- Amended Design Summary
- Form, Massing and External Fabric Principles Statement
- Wayfinding Strategy
- Access and Circulation Information
- Flood Mitigation advice
- Amended BDAR
- Parking Study and Traffic Assessment
- Arts Strategy and Community Engagement Framework.

The amended plans incorporated the following:

- a general reconfiguration and reduction of the building footprint as a result of design development in consideration of the hospital service requirements and functional layouts.
- an increase in building height from relative level (RL) 140.25 (57 metres) to RL 142.32 (59.09 metres).
- refinements to the external façade of the building including:
 - changes in the horizontal material break up of building form.
 - simplification of the material palette.
- revisions to the carpark and access arrangements to the west and south of the proposed building, including the:
 - retention of part of the existing carpark to the north-west of the proposed building.
 - redesign of the new emergency department carpark, drop-off and ambulance bay access road.
 - removal of the proposed at-grade carpark to the south of the proposed building from the scope of works included the SSD application.
 - revision of access and car parking configuration works proposed to the south of the building under separate approval processes.

The changes to the proposed parking and access arrangements means that the proposed development, as revised in the RtS, includes the removal of 271 at-grade parking spaces and provision of 52 replacement spaces. Consequently, the proposed revised development will result in a total of 1865 spaces on site when other changes to parking on site, proposed under separate approval processes, are considered. This represents an increase of 409 spaces above the number of spaces on site at the time of writing this report.

The RtS was made publicly available on the Department website and was referred to the relevant public authorities. An additional six submissions were received from public authorities, including Council. A summary of the issues raised in the submissions is provided at **Table 6** and copies of the submissions may be viewed at **Appendix A**.

Table 6 | Summary of public authority submissions to the RtS

Council

Council advised that it had no further comments to make in relation to the application.

Air Services Australia

Air Services Australia advised that the revised building height would not impact any sector or circling altitude, any instrument approach or departure procedure for Camden Airport. Nor would the proposal affect communication, navigation or surveillance facilities.

EPA

The EPA made reference to its original comments in relation to the proposed increased construction hours and advised that the Department should ensure that the accepted construction hours are appropriately justified and controls are implemented to minimise noise.

OEH

OEH:

- acknowledged the updated BDAR and advised that no further comments were made in relation to biodiversity.
- recommended the implementation of an unexpected finds procedure in relation to Aboriginal cultural heritage.
- noted the updated flood modelling and recommended the preparation of an emergency response management plan for flood events larger than the 1 per cent AEP.

RMS

RMS raised no further comment in relation to the application.

TfNSW

TfNSW noted the Applicant's advice in relation to the accommodation of bus services within the proposed road network and requested that the Applicant liaise with TfNSW on planned bus movements when these are known.



6. Assessment

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

- built form and urban design.
- traffic and parking.
- noise and vibration.

Each of these issues is discussed in the following sections of this report. Other issues taken into consideration during the assessment of the application are discussed at **Section 6.4**.

6.1 Built form and urban design

The Applicant advises that the proposed design was developed in consideration of the project objectives to:

- provide a world class acute health facility which will become a civic focus for the community and the people of the South Western Sydney Local Health District.
- achieve efficiencies and flexibility for operation and function and longer-term expansion strategies.
- facilitate contemporary models of patient centred care.
- enhance communication between the multidisciplinary staff team and optimise clinical outcomes in a secure and safe environment.

The Applicant advises that a master planning process was undertaken to inform the siting of the proposed building, which was selected to create an integrated clinical zone centred on Buildings A to C, while the operational needs of the hospital informed the overall form and height of the building.

The proposed building would be 13 storeys (59.09 metres) in height including two partial basement levels and rooftop helipad. This would be located immediately to the south of Buildings A and B and be integrated into the core hospital facilities (Buildings A to C) through the construction of a multi-level hospital spine. Landscaped areas and courtyards would also be incorporated, including along the hospital spine, involving planting, public seating areas and sculpture elements.

In response to the exhibition of the EIS, Council advised that it supported the proposal and provided comments in relation to the proposed built form. Council advised that whilst the building would be larger in proportion than would be expected for the site, it considered that the design has resulted in a proportioned built form response. As the proposed building would dominate the landscape, Council advised that consideration of the façade treatment is of paramount importance. In this regard, Council advised that the design should be revised with more emphasis on vertical elements, particularly the finger points of the building, to facilitate a hierarchy of façade treatment. This should seek to soften the buildings impact in the landscape.

Following consideration of the EIS, the Department and GA NSW also raised a number of queries in relation to the treatment of the bulk and scale of the building, including facade composition and materials.

In response to the comments made, the Applicant submitted revised plans as part of the RtS as well as additional information explaining the proposed design. The revised plans and additional information detailed:

- an overall reduction in the mass of the building and an increase in building height of 2.09 metres.

- a new façade treatment for the building incorporating a change in the horizontal material breakup of the building form. This includes three bands and four material types to achieve the vertical stratification of the overall built form using glass reinforced concrete, porcelain tiles and anodised aluminium sheet. The Applicant advises that this approach has been informed by remnant Cumberland Plain Woodland which is a prominent feature in the locality comprising:
 - Sub-basement (Levels L00 and L01) incorporating reinforced glass fibre cement of shale tonal colouring with recessed punched openings.
 - Podium (Levels L02 to L05) incorporating solid and textural materials, comprising varying profiled porcelain tiles of metallic glazed earthy tonal colouring, with recessed punched openings.
 - Tower (Levels L06 to L13) incorporating lighter materials with a strong emphasis of the vertical, comprising aluminium sheeting and striation of colouring from silver grey greens to eucalyptus greens at the buildings crown, with vertical flush faced openings.
- further design detail of the proposed main hospital entrance and circulation spine.

The revised façade treatment is shown in **Figures 13** and **14**. An image of the proposed main hospital entrance is shown in **Figure 15** and spine in **Figure 16**.

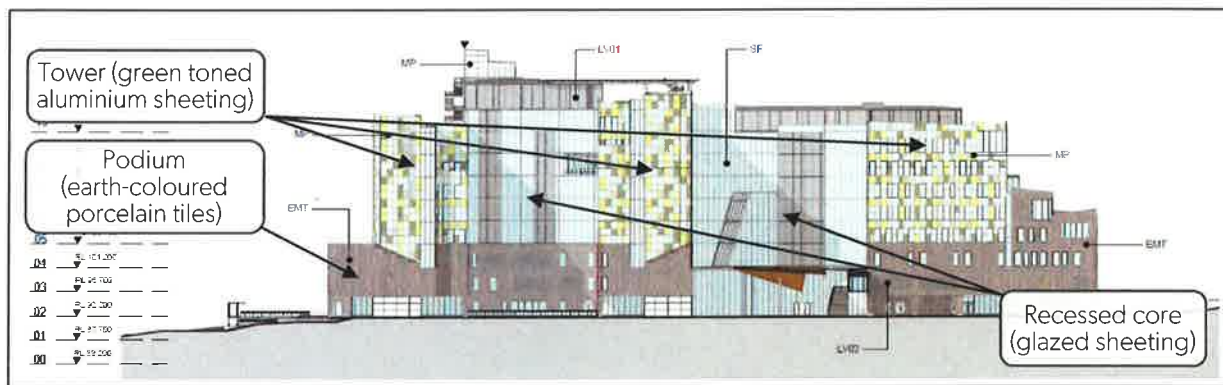


Figure 13 | Southern (revised) elevation (Source: Applicant's RtS 2018)

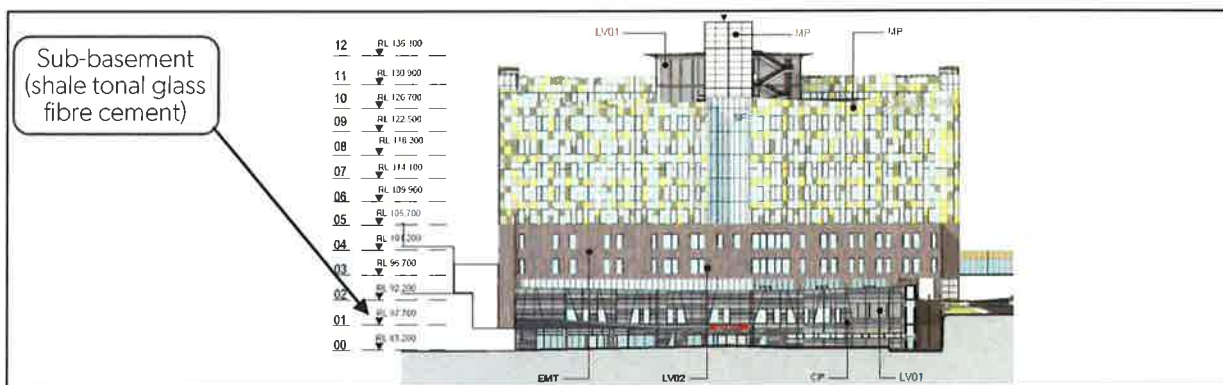


Figure 14 | Western elevation (Source: Applicant's RtS 2018)



Figure 15 | Main entrance (Source: Applicant's RtS 2018)



Figure 16 | Internal view of hospital spine (Source: Applicant's RtS 2018)

The RtS was referred to Council which advised that it had no further comments in relation to the proposal.

The Department has reviewed the comments made by Council and the information provided by the Applicant in the RtS and has considered the revised design within the context of the surrounding built form. Whilst recognising that the proposed building would be taller than the existing surrounding development, the Department concludes the proposal would be acceptable on the following basis:

- the building would be located within the centre of the large hospital site with extensive setbacks to the site boundaries, meaning that the building will be viewed within the context of the wider hospital site, with existing buildings and landscaping offering a visual transition to the taller built form.

- the taller and more prominent built form is appropriate given the importance of the hospital as a facility of regional significance and the sites proximity to the Campbelltown city centre.
- the proposed design incorporates architectural design features to provide visual interest and minimise the massing of the building, including modulation, articulation and the incorporation of materials, colours and finishes that reflect the natural environment.
- the proposal would have acceptable amenity impacts as surrounding residential properties are sufficiently separated from the proposed building and overshadowing would not extend outside of the site (see **Section 6.4**).
- the proposal elevates the presence of the hospital in the locality with a more easily identifiable main entrance, improved wayfinding and high standard central circulation area connecting the main hospital buildings.
- the built form is consistent with typical hospital building design that maximises efficiency through vertical alignment of functions and services, and modulates the building to reduce the visual mass.
- the larger form allows for the consolidation of services in a fit-for-purpose building with improved connections to existing hospital buildings that would allow for improved standard of care and functionality of the site.
- the site is not subject to a maximum building height control or maximum floor space ratio under the CLEP.

Night time lighting

Council advised that the night time architectural response is considered to be of equal importance to the daytime response. Council considered that subtle and distinct lighting solutions should be implemented that do not draw the viewer's eye to the outline and scale of the building. Rather, the lighting should be sympathetic to the sensitive suburban and rolling hills environment that the building sits within.

In the RtS, the Applicant advised that it is willing to prepare a lighting strategy for the building in consultation with Council. The Department accepts the comments made by Council and has recommended a condition requiring a lighting strategy to be prepared for the building in consultation with Council.

6.2 Traffic and parking

Operational traffic

The EIS included a Traffic Impact Assessment (TIA) which considered the traffic and parking impacts of the proposal, including the potential increase in traffic as a result of the proposal and the impact of the proposed new access points onto Appin Road and Therry Road.

The TIA calculated the estimated increase in trips on the surrounding network based on the proposed increase in parking numbers on site. This was done as previous traffic studies undertaken at the site have shown that the number of trips to the hospital are governed by the availability of parking on the site. The analysis estimated that there would be 470 additional trips in each of the two daily peak periods at the site (7am to 8am and 3:30pm to 4:30pm) identified through traffic surveys. The distribution of these trips across the various hospital access points was determined using survey data and professional judgement with regard to the expected changes to traffic movements following the completion of the proposed multi-storey carpark on site and additional connection to Therry Road.

The impact of the increase in trips on the surrounding road network was considered through a SIDRA analysis of key intersections in proximity to the site. The intersections investigated are shown in **Figure 17**.



Figure 17 | Intersections assessed in SIDRA Analysis (Source: Nearmap 2018)

The analysis examined the existing and future Level of Service (LOS) at each intersection. LOS is an indicator of the performance of an intersection based on the average delay of vehicles travelling through the intersection. This grades performance from A (good operation with delays of less than 14 seconds) to F (extra capacity required with delays in excess of 70 seconds). The results of the analysis are summarised in **Table 7**.

Table 7 | Results of SIDRA intersection analysis

Intersection	Peak period	Existing delay (seconds)	Proposed delay (seconds)	Existing LOS	Proposed LOS
Therry Road / Central Road Roundabout	AM	8.2	9.0	A	A
	PM	16.3	20.3	B	B
Parkside Crescent / Central Road Roundabout	AM	5.3	6.2	A	A
	PM	6.2	7.0	A	A
Parkside Crescent Access	AM	2.0	2.3	A	A
	PM	1.2	1.4	A	A
Appin Road Access	AM	0.5	0.7	A	A
	PM	0.5	1.0	A	A
Therry Road / Appin Road	AM	14.3	18.6	A	B
	PM	17.8	25.8	B	B
Proposed Therry Road Access	AM	N/A	0.5	N/A	A
	PM	N/A	0.5	N/A	A

The analysis found that all intersections currently perform well with spare capacity, having a rating of LOS A or B. It also found that while the proposal would increase the level of traffic through these intersections, the proposal would not reduce the performance (LOS) of all but one of the intersections. Whilst it was found that the performance of the intersection of Therry Road and Appin Road would reduce in the morning peak period from LOS A to B, the analysis noted that B still represents a good performance with acceptable delays and spare capacity. The TIA therefore concluded that the proposal would not have any significant adverse impacts on the performance of the surrounding road network.

To limit the impact of the proposed development, the TIS included a Green Travel Plan (GTP), which examined the existing travel patterns of staff and identified potential measures to encourage staff to travel to the site by public transport, bicycle or foot. The GTP found existing low levels of non-car based trips to the site. The GTP did however find that the provision of end-of trip facilities would encourage a small percentage of local resident staff to travel by bicycle or foot.

Following exhibition of the EIS, RMS raised a number of queries in relation to the TIA, including the need for consideration of other nearby development, cumulative impacts and need for road improvement works. Council did not raise any concerns in relation to traffic impacts in its submission and traffic was not raised in the public submission.

The Applicant provided a response to the RMS comments in the RtS, confirming that the proposal would not have any significant adverse impacts on the road network and that no road improvements were required outside of the site. The RtS was referred to RMS which advised that it had no further comments in relation to the proposal.

The Department has considered the TIA, agency comments and the Applicant's RtS. Although the development would result in a minor reduction to the LOS of the intersection of Therry Road and Appin Road, this and all other surrounding intersections would continue to have a high level of performance. The proposal would also incorporate measures to reduce car dependency where possible in the context of the use. On this basis, the Department is satisfied that the local road network could reasonably accommodate traffic generated by the development. The Department has recommended conditions to require a detailed GTP to be prepared prior to the commencement of occupation to give effect to proposed mitigations.

Construction traffic

A Preliminary Construction Traffic Management Plan (Preliminary CTMP) was submitted with the application. Construction vehicles would include small vehicles, delivery trucks and heavy rigid vehicles (from 6.4 metre semi rigid vehicles to 18 metres heavy rigid vehicles) including utes, tip trucks, concrete agitators and concrete pumps. Articulated vehicles, including 18 metre 'truck and dog' and 19 metre semi-trailers, are anticipated to be used for material collections and deliveries. Special oversized vehicles are also likely to be required such as cranes. The Preliminary CTMP noted that the SSD construction works are likely to coincide with the other construction works on site, including the proposed multi-deck carpark (see **Figure 12** for a plan showing the location of the multi-deck carpark).

The anticipated access routes are shown in **Figure 18** with Appin Road being the main access point. These utilise collector or regional roads and avoid use of local roads.

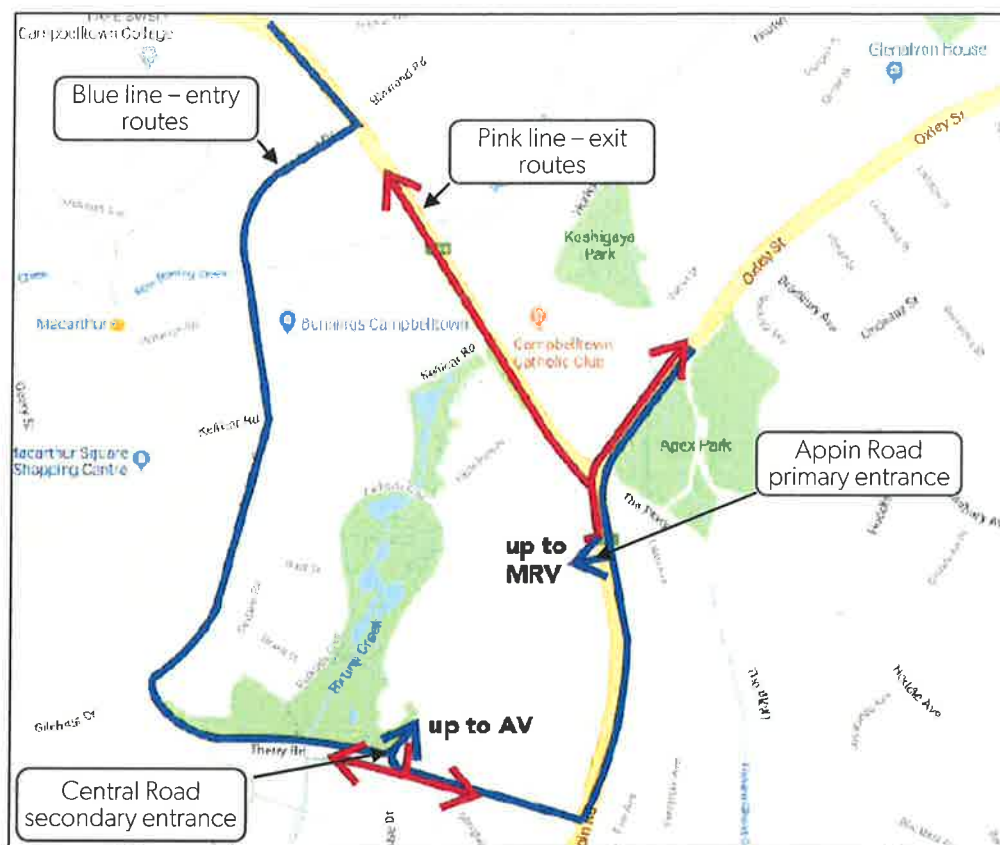


Figure 18 | Proposed construction vehicle routes (Source: Applicant's EIS 2018)

The Preliminary CTMP anticipates that external work zones would not be required as delivery and construction vehicles would be accommodated within the site and that construction vehicles would not interrupt existing traffic flows within the area.

The Department is satisfied that construction traffic can be adequately managed during construction of the development. The Department has recommended a condition requiring the preparation of a detailed Construction Traffic and Pedestrian Management Plan prior to commencement of works to ensure that impacts on the surrounding street network are minimised.

Access

The proposal includes changes to the road (and parking) layout within the site, including a new emergency drop-off area, ambulance bay access road and one-way road with drop-off and bus stop at the main entrance on the southern elevation of the new building. The proposal also includes the construction of new left-in and left-out accesses to the external road network, including to Appin Road (replacing the existing access) and Therry Road. No changes are proposed to the existing loading bay located on the eastern side of Building B as part of the SSD works.

The TIA noted that the proposed changes would provide for efficient traffic distribution across the site and the access points would improve performance of existing intersections by distributing traffic across a greater number of available routes.

In response to the exhibition of the EIS, RMS provided recommended conditions requiring changes to the design of the proposed Appin Road access. TfNSW also requested confirmation that the proposed internal road network would be designed to accommodate bus movements.

The Applicant accepted the RMS requirements in the RtS and confirmed that the internal road network would be designed to satisfactorily accommodate bus movements. The Applicant requested that the RMS design requirements be imposed through conditions of consent.

The Department has considered the TIA and agency comments and is satisfied that the revised access arrangements are acceptable for the site and would not result in any adverse traffic impacts. The Department has recommended conditions requiring the road works to be designed in accordance with RMS, TfNSW and Council requirements.

Operational parking

The proposal, as modified in the RtS, includes the removal of 271 parking spaces and provision of 52 replacement spaces at the western end of the proposed building. A number of changes to on site parking are also underway or proposed outside of the current SSD application (see **Section 2.5**). These changes include the provision of a new 810 space multi-deck carpark along the eastern boundary of the site and at-grade parking at several other locations on the site. The Applicant advises that these changes are to be completed prior to the occupation of the building proposed in this SSD application. Overall, the proposal, in combination with other parking works on site, would result in a total of 1865 parking spaces across the hospital campus. This represents an increase of 409 spaces from the number of spaces on site at the time of writing this report.

The TIA included in the EIS set out the expected parking demand of the proposed development, informed by a parking study that was not included in the EIS. The Department therefore required the Applicant to provide a copy of the parking study following exhibition of the EIS. The Department also required the Applicant to respond to the concern raised in the public submission that the proposal did not include the construction of a multi-level carpark.

The Applicant's RtS confirmed that the wider redevelopment of the hospital included the construction of a multi-storey carpark to cater for staff, outpatients and visitors. The RtS also included a copy of the parking demand study which was undertaken in October 2017 to inform future planning of the site. This examined the existing parking demand (and travel mode share) at the site and estimated future increased demand resulting from the expansion of the hospital, including in the proposed development.

The RMS Campbelltown (Sustainable City) Development Control Plan 2015 does not provide a car parking rate for public hospital uses. The parking study therefore estimated future parking demand based on the travel mode share identified at the site and the projected increase of staff, beds and outpatient visits. Overall, the study estimated a future demand for 1797 spaces in the year 2021/22 at the completion of the proposed development.

The Department has considered the TIA included in the EIS and parking study provided with the RtS, and notes that Council, RMS and TfNSW did not raise any concerns relation to the provision of on site parking. On the basis that 1865 spaces would be provided on the campus at the completion of the proposed development, the Department is satisfied that the parking demand arising from the proposed development would be appropriately accommodated on site.

The Department has recommended a condition requiring evidence to be submitted to the Certifying Authority that 1865 parking spaces have been provided on site prior to the occupation of the proposed building. In addition, the Department has recommended a condition requiring a parking demand study to be undertaken within 12 months of the occupation of the proposed building to verify that parking demand is as anticipated. Where it is found that demand is greater than that anticipated, measures are to be recommended to manage the existing demand, improve utilisation of on site parking and / or provide additional parking facilities on site.

The Department notes that the parking study:

- calculated future demand on the assumption of a 3 per cent, 8 per cent and 10 per cent reduction in staff travel to the site by car (through the implementation of GTP measures) from the time of the study in 2017 to 2021/22, 2026/27 and 2031/32 respectively.
- recommended that measures be implemented to encourage staff to park in designated staff parking areas to reduce instances of staff reducing spaces available to outpatients and visitors in the main public car parks.
- recommended that wayfinding be provided to improve awareness of parking options on site and reduce outpatients and visitors circulating in full car parks when spaces are available elsewhere on the site.

The Department has recommended conditions to give effect to these assumptions and recommendations.

Construction Parking

In the EIS, the Applicant advised that parking would not be available on site for construction workers. Instead, carpooling and use of sustainable transport options would be encouraged, including through the provision of safe on site storage for tools by tradespeople.

Following exhibition of the EIS, the Department required the Applicant to outline specific measures to mitigate the potential impacts of construction parking given the proposed lack of parking on site. In response, the Applicant advised in the RtS that the use of on site parking, including new on site parking provided under separate approvals, would be explored. In addition, the potential to utilise car parking at nearby external sites (with the relevant landowner's agreement), including on Council land, would be investigated.

The Department is satisfied that construction parking can be adequately managed during construction subject to a recommended condition requiring the preparation of a Construction Worker Transportation Strategy prior to commencement of works. This must include the provision of sufficient parking for construction workers and the implementation of associated management arrangements to monitor and manage any construction parking issues that occur.

6.3 Noise and vibration

The proposed development has the potential to cause adverse noise and vibration impacts on surrounding properties during construction and operation as a result of construction activities, operational plant and equipment and increased traffic in the area.

The EIS included an Acoustic Assessment (AA) which considered the potential impacts of on site noise and vibration sources on the closest residential and adjoining health-facility receivers. These included the residential properties on the eastern side of Appin Road (R2 and R3), southern side of Therry Road (R4) and on the western side of Marsden Park (R5), as well as the private hospital (R6) and seniors living development (R1) to the north of the site. Impacts to users of Marsden Park (R7) were also considered.

Attended and unattended noise monitoring was undertaken to quantify the existing acoustic environment at the site and near to the sensitive receiver locations. Noise monitoring locations are shown in **Figure 19**.



Figure 19 | Location of noise monitoring locations (Source: Applicant's RtS 2018)

Construction Impacts

The Interim Construction Noise Guideline (DECCW, 2009) (ICNG) outlines the process of establishing noise management levels (NMLs) to minimise construction noise impacts on sensitive receivers. The AA determined the NMLs for each sensitive receiver based on the measured background noise levels for standard hours (7am to 6pm) and outside standard hours. These are shown in **Table 8**.

Table 8 | Construction Noise Management Levels

Receiver	Hours	Noise Affected Level - dB(A)Leq(15min)	Highly Noise Affected Level - dB(A)Leq(15min)
R1 - Seniors living development	Standard hours	55	75
	Outside standard hours	48	53
R2 - East of Appin Road - North	Standard hours	64	75
	Outside standard hours	49	54
R3 - East of Appin Road - South	Standard hours	55	75
	Outside standard hours	40	45
R4 - South of Therry Road	Standard hours	61	75
	Outside standard hours	47	52
R5 - West of Marsden Park	Standard hours	56	75
	Outside standard hours	45	50
R6 - Private hospital to the north of site	Standard hours	43 (internal level)	-
	Outside standard hours	45 (internal level)	-
R7 - Marsden Park	Standard hours	60	-
	Outside standard hours	60	-

The assessment then modelled the predicted noise levels having regard to the equipment and plant likely to be used during the varying construction phases (2A – Enabling and early works, 2B – Main works preparation and 2C – main works) for the proposed building. The results of the modelling are shown in **Figure 20**.

Location	Noise management level, $L_{Aeq}(15 \text{ min})$ dB(A)		Predicted sound level, $L_{Aeq}(15 \text{ min})$ dB(A)		
	Noise affected	Highly noise affected	Scenario 1 (Stage 2A)	Scenario 2 (Stage 2B)	Scenario 3 (Stage 2C)
Standard hours					
R1	55	75	66	37	50
R2	64	75	75	53	56
R3	55	75	70	58	59
R4	61	75	68	62	58
R5	56	75	67	59	55
R6	45 ¹	-	50 ²	30 ²	25 ²
R7	60	-	49	41	37
Outside standard hours					
R1	48	53	56	37	50
R2	49	54	75	53	56
R3	40	45	70	58	59
R4	47	52	68	62	58
R5	45	50	67	59	55
R6	45 ¹	-	50 ²	30 ²	25 ²
R7	60	-	49	41	37

Note:
1 – internal noise level
2 – predicted sound pressure level includes -10 dB adjustment accounting for external-to-internal noise reduction (assuming window partially open)




 Predicted sound pressure level ≤ noise affected level
 Noise affected level < predicted sound pressure level ≤ highly noise affected
 Highly noise affected < predicted sound pressure level

Figure 20 | Predicted noise levels at receiver locations (Source: Applicant's EIS 2018)

The modelling found that noise affected levels are likely to be exceeded at the boundaries of the sensitive receivers and that there would be periods where properties are highly noise affected. The AA noted that the predicted noise levels would only be experienced for limited periods of time when works are occurring and that all feasible and reasonable work practices would be implemented to reduce impacts.

The AA also examined the potential impacts of the construction works on sensitive receivers due to vibration having reference to relevant NSW and international guidelines. This found that the proposal would not be likely to have adverse impacts on sensitive receivers from vibration because of the large separation distances available between the construction area and the closest sensitive receivers.

Overall, the AA recommended that a detailed Construction Noise and Vibration Management Plan (CNVMP) be prepared prior to the commencement of works and that this include mitigation measures such as:

- adherence to the standard approved working hours as much as possible and close management of work outside of those hours.
- location of noisy stationary plant as far away as possible from sensitive receivers.
- use of site sheds and other temporary structures, screens or hoarding to limit noise exposure.
- sealing of openings in the building prior to commencement of internal works to limit noise emission.
- selection of low-noise construction equipment and work methods.

- design of construction methodology or programme so that noisy activities occur concurrently where one noisy activity would mask a less noisy activity, or, at different times where more than one noisy activity would significantly increase the noise.

In its submission on the EIS, the EPA made the following recommendations:

- intra-day respite periods should be implemented for works identified in the ICNG as particularly annoying and intrusive.
- construction vehicles should not arrive outside of the approved construction hours.
- a safety risk assessment should be undertaken to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.

Further EPA comments in relation to the proposed construction hours are addressed below.

The Department supports the mitigation measures proposed in the AA as well as those recommended by the EPA. The Department acknowledges that a development within an established urban environment would likely result in some noise impacts and as such, has recommended conditions to ensure noise is minimised where practicable.

Construction hours

The EIS proposes the following construction hours:

- Monday to Friday inclusive: 6.30am to 6pm.
- Saturday: 7am to 3pm.
- no work on Sundays and public holidays.

These times includes additional hours above the standard hours provided in the ICNG, including an extra 30 minutes on weekday mornings, an extra hour on Saturday mornings and two extra hours on Saturday afternoons.

In response to exhibition of the EIS, EPA advised that it did not support the proposed increased construction hours on the basis of achieving improved productivity as set out in the EIS. The EPA therefore recommended that standard construction hours should apply.

Following the exhibition of the EIS, the Department required the Applicant to provide further justification for the requested hours along with specific measures to address the potential noise impacts as a result of these works.

In the RtS, the Applicant advised that the additional time in the morning is required to enable non-noisy preparatory actions to occur to minimise these clashing with early hospital shift staff. Noise intensive equipment and processes would not be permitted during this time. The extra time on Saturday afternoon is proposed to reduce the overall construction timeframe to the benefit of the local and wider community, by delivering the project more quickly.

The Applicant noted that the extension to Saturday afternoon was shorter than the construction hours approved in the local development consent issued for the multi-level carpark (which allows work to continue to 5pm) and advised that work would in the extra hours would be required to comply with the outside standard hours controls set out in the AA.

The RtS was referred to the EPA which advised that the Department should ensure that the accepted construction hours are appropriately justified and controls are implemented to minimise noise.

The Department has considered the AA included in the EIS, additional information provided in the RtS, EPA comments and construction hours approved for other major works on the site. The Department concludes that the Applicant's proposed construction hours are acceptable on the following basis:

- the additional half hour on weekday mornings and hour on Saturday mornings would allow preparatory works to occur without disrupting the hospital shift-change and would not involve significant noise generating activities.
- the additional hours on Saturday afternoons would be less extensive than the hours approved in the SSD consent for the Stage 1 redevelopment works and local consent for the multi-storey carpark on the site.
- the relatively large size of the site and location of the proposed building within the centre of the site offers large setbacks to nearby sensitive receivers.
- appropriate controls are proposed, including those applying to outside standard hours in the AA, to ensure that impacts on surrounding residents are minimised.

The Department has recommended conditions to require the abovementioned mitigation measures to be implemented including the preparation of a CNVMP prior to the commencement of works.

Operational Impacts

The AA considered operational noise against the relevant provisions of the Noise Policy for Industry (EPA, 2017) (NPI). This indicated that mechanical plant and equipment may have a noise impact, however noted that the separation distance to offsite receivers is advantageous and provides a fundamental safeguard to those locations.

A detailed assessment was not included in the AA as the plant and equipment to be used had not yet been finalised. The AA therefore recommended that a detailed assessment be undertaken once plant and equipment has been selected and that a variety of mitigation measures be adopted where necessary to achieve compliance with project specific noise levels determined having regard to NIP criteria. Potential measures included:

- procurement of quiet plant and equipment.
- installation of acoustic attenuators for air discharge and air intakes of plant and equipment.
- use of acoustically lined and lagged ductwork.
- installation of acoustic barriers between plant and equipment and sensitive neighbouring premises.
- partial or complete acoustic enclosures over plant and equipment.

The AA concluded that the proposed development would be capable of achieving compliance with the project specific noise levels subject to this approach.

The EPA did not make any specific comments in relation operational noise in its submission following exhibition of the EIS.

The Department has considered the findings and recommendations in the AA and concludes that the noise impacts of the proposed development can be appropriately managed. The Department has recommended conditions of consent requiring:

- a detailed operational noise and vibration assessment to be prepared prior to the commencement of construction (excluding demolition) which demonstrates that noise associated with plant and equipment would not exceed the project specific noise levels identified in the AA.
- noise monitoring to verify that operational noise levels do not exceed the project specific noise levels identified in the AA.

- the provision of noise attenuating measures should noise monitoring identify exceedance of the project specific noise levels identified in the AA.

6.4 Other Issues

The Department's consideration of other issues is provided at **Table 9**.

Table 9 | Department's assessment of other issues

Issue	Discussion	Findings / Recommended Conditions
Flooding and drainage	<p>The site is located immediately east of the Birunji Creek and is located within the catchment of the creek.</p> <p>The EIS included an investigation of the flood potential of the site and potential impacts on the development. The investigation confirmed that:</p> <ul style="list-style-type: none"> the site is currently subject to minor flooding from local overland flows in a 1 per cent AEP event. flooding from overland flows, with mitigation, would generally be less than 0.1 metres deep around the proposed building. flood mitigation would be provided through amplification of the on site stormwater network. the low flood potential means that the proposed building is not considered to be flood affected and flood planning levels would not be required. the proposed development is not anticipated to increase flooding impacts on private property. a detailed stage 2 flood study would be carried out incorporating Council's updated flood study which would consider the PMF for the site and confirm flood management options. <p>In its submission to the EIS, OEH advised that additional investigations / modelling should be undertaken at an early stage using Council's updated flood study to inform controls for the proposed development including any flood planning level.</p>	<p>The Department is satisfied that the Applicant has demonstrated that the site is not affected by significant flooding. The Department has recommended conditions requiring:</p> <ul style="list-style-type: none"> the provision of evidence that flood mitigation measures have been implemented on site. an emergency response plan is prepared for the site.

The Applicant subsequently undertook further investigations / modelling as part of the RtS utilising Council's updated flood model. This confirmed the outcomes of the initial investigations of the 1 per cent AEP. It also confirmed that flooding is to be managed through the incorporation of a detention basin and tank on the site as well as the upgrade of the capacity of stormwater drainage through the site, including alongside roadways. The RtS noted that the upgrade of stormwater pipelines and the provision of the on site detention would be provided under other approval processes and do not form part of the SSD application. These works would be completed prior to the completion of the SSD works.

The additional investigations also identified that while existing external access roads to the health precinct would be cut in the PMF, the hospital would be minor flood affected.

The RtS was referred to OEH which noted the above advice. OEH recognised that the proposed new connection to Appin Road and Therry Road would offer a non-flood affected route out of the site in a PMF event. It was also recommended that an emergency response plan be prepared for flood events above the 1 per cent AEP in consultation with Council and the NSW State Emergency Service.

Contamination

A detailed site investigation (DSI) was included in the EIS. This involved a review of land use history of the site and previous contamination investigations undertaken in relation to the site. Testing of soil samples was also undertaken in conjunction with geotechnical investigations.

Testing identified that heavy materials were found to have concentrations below the relevant criteria and no asbestos was reported. Overall the DSI concluded that the risk of contamination on site is low and that the site is suitable for the continued use as a hospital.

In its submission to the exhibition of the application, EPA noted that the number and depth of samples tested was less than that

The Department has reviewed the DSI and additional information provided in the RtS, and is satisfied that the Applicant has adequately demonstrated that the site is suitable for ongoing use as a hospital as required by SEPP 55. The Department has recommended a condition to require a Site Audit Report and Section A Site Audit Statement to be issued prior to the commencement of construction in order to verify the suitability of the site.

The Department has also considered the EPA's advice and accepts the recommendations in relation to procedures for unexpected finds. The

recommended in EPA guidelines and that updated groundwater testing had not been undertaken. The EPA also provided recommendations in relation to further investigations to be undertaken following the demolition of existing buildings, appointment of a site auditor if contamination is found, and preparation of an unexpected finds procedure.

The Applicant provided more information in its RtS which explained the methodology taken in determining the scope of sampling undertaken.

The RtS was referred to EPA which advised that is had no further comments to make in relation to contamination issues.

Department has recommended conditions to give effect to these requirements.

The Department has also recommended a condition requiring the Applicant to undertake works in accordance with *Protection of the Environment Operations (Waste) Regulation 2014* and consult with SafeWork NSW if any asbestos waste is to be handled and / or disposed of.

Tree removal	<p>An arboricultural report was included with the EIS. This assessed 148 trees located within the proximity of the proposed building and associated car parking and access road works.</p> <p>The report concluded that 31 trees would need to be removed to accommodate the proposed works, including:</p> <ul style="list-style-type: none"> • one tree of high retention value. • 28 trees of medium retention value. • two trees of low retention value. <p>The bulk of the trees to be removed are located within the footprint of the proposed building or to its immediate south. Three trees are to be removed on the eastern boundary of the site in proximity of the proposed connection to Appin Road.</p> <p>Tree removal was not raised as a concern by Council or the public submitter.</p>	<p>The Department accepts that tree removal is necessary to accommodate the proposed building in proximity to the existing hospital facilities.</p> <p>The Department notes that the bulk of the tree removal is located within the centre of the site in proximity to trees to be retained and proposed replacement planting involving in the order of 87 trees on the site. On this basis, it is considered that the proposal would not have an adverse effect on amenity and would maintain the landscape character of the site.</p> <p>The Department has recommended conditions in relation to protection of trees to be retained and the implementation of proposed landscaping.</p>
Biodiversity	<p>A BDAR was included with the EIS. This identified that the proposal impacts on two Threatened Ecological Communities (TEC) listed under the BC Act, including Cumberland Plain Woodland which is a Critically Endangered Ecological Community (CEEC) and River-flat Eucalypt Forest which is an Endangered Ecological Community (EEC).</p> <p>The BDAR set out the measures taken to avoid, minimise and mitigate impacts to the vegetation</p>	<p>The Department notes the conclusions of the BDAR and the advice provided by OEH.</p> <p>The Department is satisfied that the biodiversity impacts of the proposal would be appropriately offset by the offset strategy set out in the BDAR. The Department has recommended conditions requiring the implementation of the offset strategy,</p>

and species habitat present within the site. It concluded that the unavoidable impacts of the proposal include the removal of 0.12 hectares of Cumberland Plain Woodland, with six ecosystem credits required to offset this impact. In addition, it concluded that the proposal is unlikely to have any Serious and Irreversible Impacts due to the small area and poor condition of Cumberland Plain Woodland to be impacted.

In response to the exhibition of the EIS, OEH queried the timing of surveys undertaken for flora species on the site. It also advised that the Serious and Irreversible Impacts assessment had not been undertaken in accordance with OEH's BAM. The Applicant provided an amended BDAR in the RtS which was forwarded to OEH for consideration.

OEH subsequently advised that it noted that the BDAR had been updated to include a detailed assessment of Serious and Irreversible Impacts and that it had no further comment.

including the retiring of the specified ecosystem credits.

Bush fire

Part of the hospital precinct is mapped as bush fire prone in the Campbelltown Bush Fire Prone Land Map. The proposed building is not however located within the buffer and is approximately 150 metres from the mapped bush fire prone vegetation.

A bush fire requirements statement was included in the EIS. This noted that the proposed building would be more than 100 metres from the mapped vegetation and that the vegetation itself is not of sufficient dimensions or size to be a significant threat. No bush fire protection measures were recommended having regard to the requirements of Planning for Bush Fire Protection 2006 (NSW RFS).

The NSW RFS raised no objection to the proposal and has recommended bush fire protection measures to be implemented. These include the provision of utilities in accordance with NSW RFS requirements and the preparation of an emergency management plan for the hospital.

The Department notes the bush fire assessment included in the EIS and the advice provided by the NSW RFS.

The Department is satisfied that appropriate bush fire protection measures are proposed for the development. The Department has recommended conditions to require implementation of the suggested bush fire protection measures.

Sediment, Erosion and Dust	<p>A preliminary construction management plan was included with the EIS. This proposed the preparation of an erosion and sediment control plan to contain sediment within the site and prevent soil erosion. Proposed measures include the diversion of clean runoff away from works areas and collection and treatment of sediment affected runoff before discharge from the site. Measures are also proposed to control dust, such as watering down of roads and stockpiles, covering of haulage trucks and stockpiles, and monitoring of weather conditions on site.</p> <p>The EPA recommended that appropriate sediment, erosion and dust control measures be implemented during works to minimise the impacts of the proposal.</p>	<p>The Department has recommended conditions requiring the preparation of a final detailed construction management plan prior to the commencement of construction works on the site. This must set out all reasonable measures to prevent adverse impacts on surrounding landowners and the environment.</p>
Hazardous / dangerous goods and waste	<p>The EIS included an assessment of the hazardous / dangerous goods and waste to be managed in the proposed development.</p> <p>The assessment determined that the proposal would not involve hazardous / dangerous goods and waste that is not already managed by the existing hospital operations.</p> <p>Overall, the assessment concluded there is a low to medium risk associated with the proposed development, noting that the hospital would be operated below the screening thresholds for further investigation.</p>	<p>The Department has recommended conditions to ensure that hazardous / dangerous goods and waste is managed in accordance with relevant standards and that appropriate control measures and safeguards are implemented.</p>
Development contributions	<p>The Campbelltown Local Infrastructure Contributions Plan 2018 sets out development contribution requirements that apply within the Campbelltown LGA. This provides that development comprising public infrastructure to be carried out by or on behalf of any public authority is exempt from the provisions of the Plan.</p>	<p>The Department notes that the proposed development is not subject to contributions under the Campbelltown Local Infrastructure Contributions Plan 2018.</p> <p>The Department considers that no additional conditions or amendments are necessary.</p>
Aboriginal cultural heritage	<p>An Aboriginal cultural heritage archaeological survey report was included in the EIS. This included an archaeological survey of the site and consultation with Aboriginal stakeholders. The report concluded that there was limited potential for historical heritage values to be</p>	<p>The Department has reviewed the EIS and advice provided by OEH. The Department is satisfied that the proposal is unlikely to result in significant impacts on Aboriginal heritage and that the likelihood of</p>

	<p>impacted by the proposal and that no Aboriginal sites are registered on the site. An unexpected finds protocol was recommended.</p> <p>In its submission to the exhibition of the EIS, OEH recommended procedures for unexpected finds of Aboriginal objects or ancestral remains.</p>	<p>recovering Aboriginal items of significance is low.</p> <p>The Department has recommended conditions setting out procedures to be implemented if unexpected Aboriginal objects or ancestral remains are found.</p>
Non-Aboriginal heritage	<p>The Heritage Division has advised that there are no items listed on the State Heritage Register within the site or within the vicinity of the development works which may be impacted by the proposal. A condition was recommended in relation to procedures if unexpected archaeological relics are found on site.</p>	<p>The Department notes the advice of the Heritage Division and has recommended a condition setting out procedures to be implemented if unexpected archaeological relics are found on site.</p> <p>The Department is satisfied that the proposed development would not have adverse impacts on non-Aboriginal heritage.</p>
Overshadowing, privacy and view loss	<p>The EIS included an assessment of potential overshadowing, privacy and view loss impacts of the proposal. This concluded that the proposal would not result in any adverse impacts on nearby residential properties given:</p> <ul style="list-style-type: none"> the size of the site and large setbacks provided between the building and the nearest residential properties. the proposed building would represent an evolution of the existing built form on site. the building would not interrupt any significant views. 	<p>The Department is satisfied that the proposed building would not have overshadowing or privacy loss impacts on surrounding properties given the large setback of the proposed building from nearby residential properties. Furthermore, the proposed building would not detrimentally affect any existing significant district views.</p>
Airspace protection / Helicopter operations	<p>CASA advised that the site is located outside of the obstacle limitation surfaces for Camden Aerodrome. Air Services Australia further advised that the proposal would not affect relevant airspace procedures or communication / navigation / surveillance facilities.</p> <p>The amended building design included in the RtS involved an increase in height of approximately two metres. The RtS was therefore referred to CASA and Air Services Australia. Air Services Australia advised that the</p>	<p>The Department has recommended conditions requiring the existing and future helicopter operations to be reviewed and revised during construction works and following the completion of the proposed building.</p> <p>The Department has also recommended a condition requiring the Applicant to provide details of the proposed helicopter flight paths to Council. This would allow Council to consider the need for appropriate airspace protections to facilitate</p>

revised height would not have any additional impacts.

ongoing helicopter operations at the site.

The proposal includes the installation of a new helipad on the roof of the proposed building. This would replace the existing ground level helipad on the western boundary of the site.

CASA advised that it does not have oversight of helicopter landing sites but referenced Civil Aviation Advisory Publication 92-2(2) which provides guidelines for the establishment and operation of onshore helicopter landing sites.

An aviation report was included in the EIS to consider the impacts of the proposal on helicopter operations at the site. This noted that the transition to a rooftop location for the helipad would increase the safety of flight operations. It also noted that flight paths would largely replicate the existing flight paths to the site which run to the north-west and south-east.

The report advised that helicopter operations may be impacted during construction works for the proposed building. A review of these operations is recommended once the construction methodology is known.

6.5 Public Interest

The proposal is considered to be in the public interest as it would provide the following public benefits:

- the provision of modern health facilities consistent with best practice guidelines and current standards for health care.
- the delivery of additional health care facilities to support the growing and ageing population of the region.

The proposal would generate up to 350 construction jobs and 418 full time equivalent operational jobs. The proposal would also address state priorities as it would provide improved health infrastructure to meet Sydney's growing population. The Department therefore concludes that the proposal is in the public interest.

7. *Evaluation*

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

The proposed development is consistent with the objects of the EP&A Act (including ESD) and is consistent with the State's strategic planning objectives for the site as set out in the Greater Sydney Regional Plan: A Metropolis of Three Cities and the Greater Sydney Commission's Western City District Plan as it would create jobs and provide for better access to health care services. The proposal would provide significant public benefit to the local and regional community through the provision of increased and improved health services for an identified strategic centre.

The proposed development is suitable for the site and would not result in any significant adverse environment or amenity impacts and would provide an appropriate built form for the site. The Department has recommended conditions to manage the impacts of the proposal during construction and operation.

The proposal is considered to be in the public interest as it would provide public benefits, including:

- the provision of modern health facilities consistent with best practice guidelines and current standards for health care.
- the delivery of additional health care facilities to support the growing and ageing population of the region.
- delivery of up to 350 new construction jobs and 418 full time equivalent operational jobs.

The Department concludes the impacts of the development are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved subject to conditions.



8. Recommendation

It is recommended that the Executive Director Priority Projects Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant consent to the application.
- **agrees** with the key reasons for approval listed in the notice of decision.
- **grants consent** for the application in respect of Campbelltown Hospital Redevelopment Stage 2 (SSD 9241).
- **signs** the attached development consent and recommended conditions of consent (see **Appendix C**).

Recommended by:

Jason Maslen

Senior Planning Officer

Social and Other Infrastructure Assessments

Recommended by:

Karen Harragon

Director

Social and Other Infrastructure Assessments



9. Determination

The recommendation is **Adopted** / **Not adopted** by:

David Gainsford

Executive Director

18/2/19

Priority Projects Assessments



Appendices

Appendix A- List of Documents

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows.

1. Environmental Impact Statement
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9241
2. Submissions
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9241
3. Applicant's Response to Submissions
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9241

Appendix B- Statutory Considerations

ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

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

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

- State Environmental Planning Policy (State & Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
- Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP)
- Campbelltown Local Environmental Plan 2015 (CLEP).

COMPLIANCE WITH CONTROLS

SRD SEPP

Table B1 | SRD SEPP compliance table

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

Infrastructure SEPP

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

The Department has consulted and considered the comments from the relevant public authorities (refer to **Sections 5** and **6** of the report). The Department has included suitable conditions in the recommended conditions of consent (see **Appendix C**).

SEPP 33

SEPP 33 provides clear definitions of hazardous and offensive industries and aims to facilitate development defined as such and to ensure that in determining developments of this nature, appropriate measures are employed to reduce the impact of the development and require advertisement of applications proposed to carry out such development. A preliminary hazard analysis is required if the development is identified as a potentially hazardous or potentially offensive development, having regard to the screening thresholds set out in supporting guidelines.

The EIS included an assessment of the hazardous / dangerous goods and waste to be managed in the proposed development. The assessment determined that the proposal would not involve hazardous / dangerous goods and waste that is not already managed by the existing hospital operations. Overall, the assessment concluded there is a low to medium risk associated with the proposed development noting that the hospital would be operated below the screening thresholds for further investigation. On this basis, the Department is satisfied that a preliminary hazard analysis is not required.

With regard to the disposal and transporting of hazardous / dangerous goods and waste, the Applicant advises that the hospital has existing procedures in place and this would be undertaken by regulated contractors in accordance with standard safety procedures for each product. The Department is therefore satisfied that the transport of goods and waste would be appropriately managed.

SEPP 55

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application. The EIS included a detailed site investigation of the site which concluded that the risk of contamination is low and that the site is suitable for the continued use as a hospital.

The Department has considered the EIS and advice provided by the Environmental Protection Authority and is satisfied that the site is suitable for the continued use as a hospital as required by SEPP 55. See **Section 6.4** for further details.

Draft Remediation SEPP

The Draft Remediation SEPP retains the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment. Additionally, the provisions of the Draft Remediation SEPP require that:

- all remediation work that is to be carried out without development consent is to be reviewed and certified by a certified contaminated land consultant.
- remediation work be categorised based on the scale, risk and complexity of the work.

- environmental management plans relating to post-remediation management of sites or ongoing operation, maintenance and management of on site remediation measures (such as a containment cell) be provided to council.

The Department is satisfied that the proposal will be consistent with the objectives of the Draft Remediation SEPP.

CLEP

The CLEP aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Campbelltown LGA. The CLEP also aims to conserve and protect natural resources and foster economic, environmental and social well-being.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the CLEP and those matters raised by Council in its assessment of the development (refer to **Section 5**). The Department concludes the development is consistent with the relevant provisions of the CLEP. Consideration of the relevant clauses of the CLEP is provided in **Table B2**.

Table B2 | Consideration of the CLEP

CLEP	Department Comment/Assessment
Clause 2.1 Zone	The site is included in the SP2 – Infrastructure: Health Services Facilities zone. A hospital is a permitted use within the zone.
Clause 4.3 Building height	The site is not subject to a height limit.
Clause 4.4 Floor Space Ratio	The site is not subject to a floor space ratio limit.
Clause 5.10 Heritage conservation	The site does not contain nor is near to any sites of local heritage significance. Nor is the site or surrounding land included in a heritage conservation area.
Clause 7.1 Earthworks	The earthworks associated with the proposed development include excavation to accommodate the proposed building (which includes two levels partially belowground) and the adjoining access road within the sloping site. The excavation works are not anticipated to result in any significant impacts to drainage or soil stability. Additionally, the site is not located in proximity to any identified areas of archaeological sensitivity environmentally sensitive areas. The earthworks are not expected to result in any unreasonable impacts and appropriate mitigation measures are proposed to manage impacts, including management of dust, noise and erosion and sediment control during construction.
Clause 7.2 Flood Planning	See Section 6.4 for consideration of flooding and drainage on the site.
Clause 7.10 Essential Services	All essential services are available to the development. The Department has recommended conditions of consent that require services to be connected to the development prior to the commencement of aboveground works.

Clause 7.18 Access to or from public roads

The EIS included an assessment of the impacts of the proposal on traffic flow and safety on the road network surrounding the site. This concluded that the surrounding road network has capacity to accommodate the anticipated increase in traffic associated with the proposed development. In addition, the proposed additional road connections into the site will distribute traffic flow and impacts of the proposal.

The application was referred to Council and RMS who advised that it had no objections to the proposal. The Department has recommended conditions of consent to give effect to access road design requirements specified by RMS. See **Section 6.2** for further details.

Other policies

In accordance with Clause 11 of the SRD SEPP, development control plans do not apply to state significant development. Notwithstanding this, the objectives of relevant controls under the Campbelltown (Sustainable City) Development Control Plan 2015, where relevant, have been considered in **Section 6** of this report.

Appendix C- Recommended Instrument of Consent