

28 March 2018

Ms Carolyn McNally
Secretary
Department of Planning and Environment
320 Pitt Street,
Sydney, NSW, 2000

Dear Ms McNally

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

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) the purpose of this letter is to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed Campbelltown Hospital Redevelopment (CHR) Stage 2. This request is made by Health Infrastructure (HI) as proponent for the proposed redevelopment. To support this request, outlined below is an overview of the proposed development, the statutory context, and the key likely environmental and planning issues associated with the proposal. Draft architectural plans have been prepared by Billard Leece Partnership and are available at **Attachment A**.

1.0 Background

The Clinical Services Plan for Macarthur to 2031 identified the need for the expansion of the existing hospital services and development of the hospital campus to operate as a complete tertiary affiliated Principal Referral Hospital. This is based on significant population growth in the Campbelltown-Macarthur region, which continues to put unprecedented increases in demand for health services.

Stage 1 of the Hospital Redevelopment was approved under SSD 5003 on 21 November 2012 for the following development:

- construction of a new six level Acute Health Services building;
- construction of a new covered walkway linking the new Acute Health Services building, Campbelltown Hospital main entry, Block A, Block B and Block C;
- new patient drop off zone, six visitor parking spaces and service vehicle access from Parkside Crescent; and
- new landscaped entry driveway, internal landscaped courtyards and new communal café.

Stage 1 was completed in early 2016. Since then a development application for a seven (7) storey car park on site has been made and is currently under assessment by Campbelltown City Council.

Health Infrastructure
ABN 89 600 377 397

This application is for the proposed Stage 2 works.

1.1 Need for the Redevelopment

1.1.1 Government Commitment

In May 2017, the South Western Sydney Local Health District (SWSLHD) Board approved the Campbelltown Hospital Redevelopment Stage 2 project as the number one Capital Works Priority over the next 10 years. The Asset Strategic Plan identified the Project as a single stage development to be delivered within the 2017-2026 planning horizon to address the rapid population growth and future role of Campbelltown Hospital within the SWSLHD network.

On 17 June 2017, it was announced the NSW Government will deliver a \$632 million upgrade for the Campbelltown Hospital Redevelopment Stage 2 (CHR) in the upcoming 2018 State Budget, including a boost to paediatrics and mental health services.

1.1.2 Vision for Services

The SWSLHD long term Vision for Services for its hospital network is 'Leading Macarthur to Better Health'.

Campbelltown Hospital is pivotal to the Macarthur Health Neighbourhood which incorporates Camden Hospital and Oran Park Integrated Health Hub, in delivering an increased health care service to treat its community locally.

1.1.3 The Case for Change

The case for change aligns with the NSW Government's commitment to invest in the CHR Project to address the key drivers for change including:

- Significant growth in population, age profile (0-14 and 70+ cohorts), complexity and incidence of disease and poor health;
- Health issues associated with the higher than state average health status indices and rates of preventable hospitalisation;
- Increase in clinical services demand to address patient needs in particular for mental health, paediatrics, maternity, emergency services, surgical and cancer services;
- Need to increase the role delineation level (Tertiary Hospital Level 6) of the Hospital including range and complexity of clinical services to meet demand for local community and wider health network; and
- Provision of additional capability and capacity through enabling health infrastructure and technologies to address the significant projected growth in population and related health service needs, deliver innovative models of care, and develop a capable and effective workforce to meet the health challenges in Macarthur over the coming years.

1.1.4 Service Delivery Priorities

The CHR Project needs to address the Clinical Services Plan (CSP), Core Clinical Service Development Directions and Key Infrastructure Priorities to 2026/27 and provide the foundation for service development and subsequent investment to 2031 and beyond.

The case for change underscores the need for expanded and enhanced health infrastructure to support the development of services and meet the needs of the community in line with the determined clinical service priorities and the SWSLHD Hospital Network and the Sydney Children's Hospital Network.

The agreed clinical service priorities were collaboratively identified through the planning phase and are aligned to the CSP and the case for change. The CHR Project will deliver the core services to ensure Campbelltown Hospital achieves the required Tertiary Hospital Level 6 with the range and complexity of clinical services delivered to the local community and broader network to meet the projected growth of the Macarthur region.

The core services include:

- Core services:
 - Operating and Procedural Suites
 - Intensive Care
 - Nuclear Medicine
 - Radiology / Interventional
 - Anaesthetics and Recovery
- Emergency Services, including Psychiatric Emergency Care Centre
- Paediatric including:
 - Medical, Surgical and Ambulatory
 - Adolescents and Youth Health Services
- Maternity, Sydney Children's Hospital Network and Neonatal Services
- Acute Mental Health Services integration, notably:
 - Child/Adolescent inpatient services with Paediatrics
 - Acute Youth integration and operational connections
 - Acute Adult with gender specific capacity
 - Establish a new Older Persons Mental Health capacity
 - A new Civil Secure Unit.

2.0 The Site

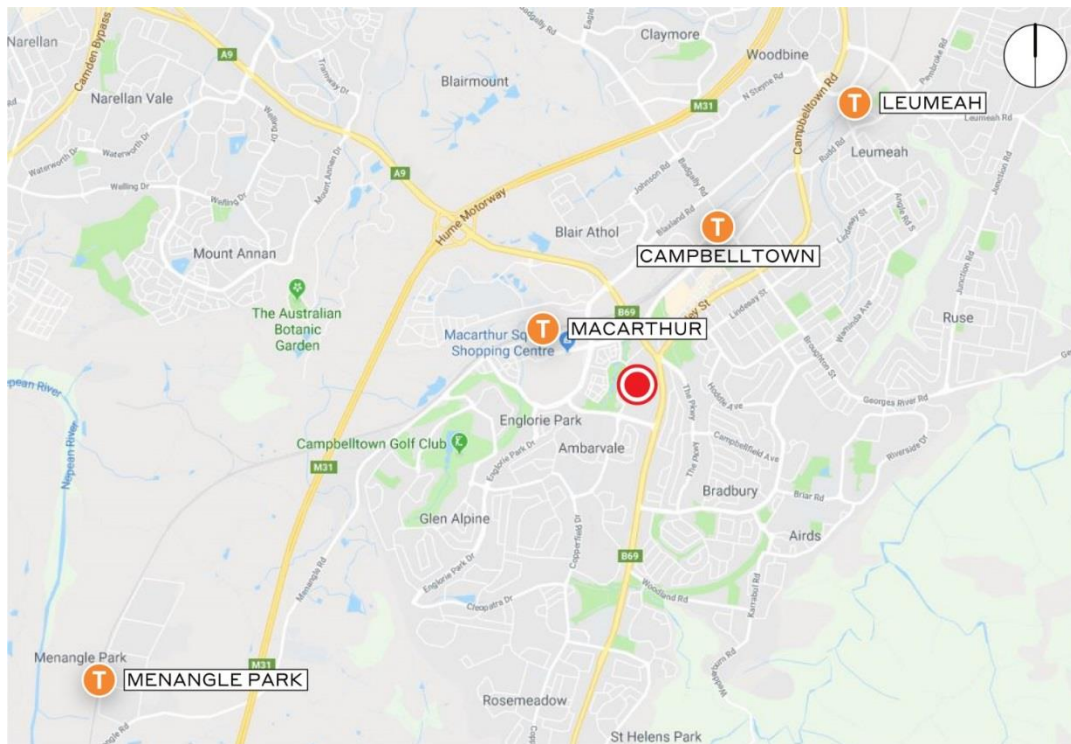
The Campbelltown Hospital site is located within the Campbelltown Local Government Area, approximately 51km southwest of Sydney's Central Business District. The site is serviced by and is in close proximity to transport services, and key road networks links including the M5 South Western Motorway, which provides a direct link to the airport and the M7 Westlink Motorway.

The hospital site is located in proximity to Campbelltown and Macarthur railway stations, the closest station being Macarthur approximately 1.3km north west of the Hospital site. Refer to Figure 1 for locational context.

The site is bounded by Campbelltown Private Hospital and a seniors living development to the north; Parkside Crescent and Marsden Park to the west; and arterial roads Appin Road and Therry Road to the east and south respectively.

Marsden Park is public open space with a large open water body / riparian system that is situated between the Hospital site and low to medium density dwellings located west and southwest of Marsden Park.

The Macarthur Square retail precinct is within walking distance from the Hospital's north-west boundary. The University of Western Sydney Campbelltown campus is located further north of Macarthur Station, which provides a tertiary facility for education and research linked to the hospital.



 The Site

Figure 1 Locational Context

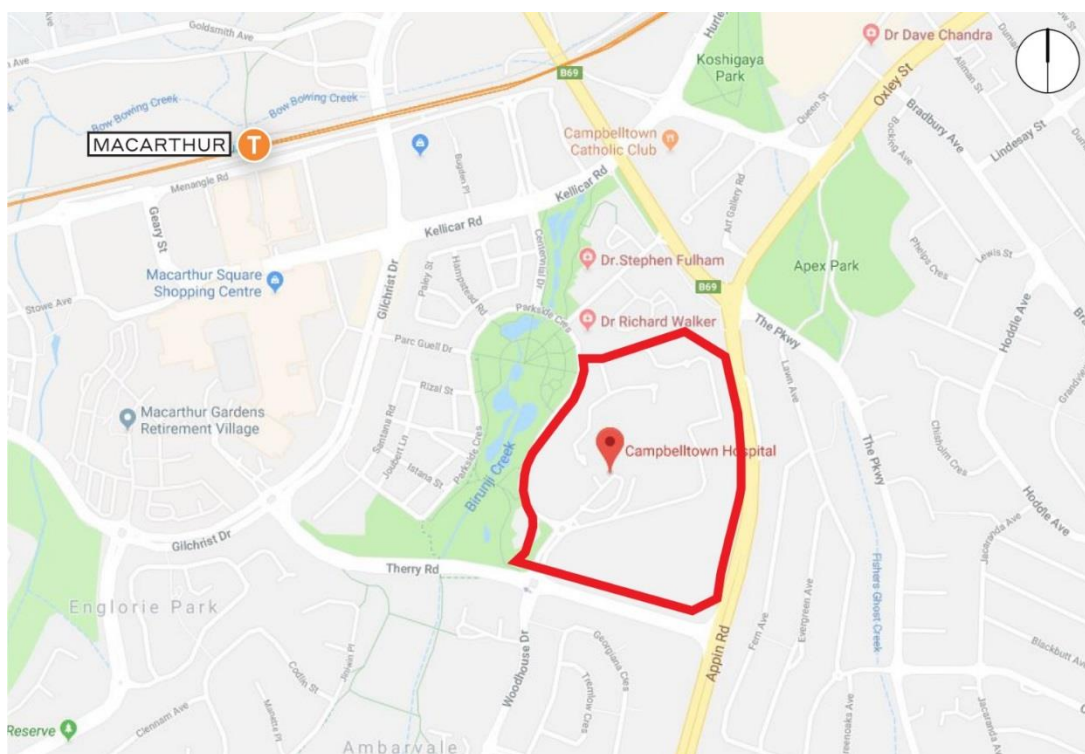
Source: Ethos Urban and Google Maps

To the south and east of the hospital site, on the opposite side of Therry and Appin Roads, is an area of established low scale residential dwellings. Thomas Reddall High School is within the residential development area to the south of the site.

The site has an approximate area of 19.33 hectares, and slopes from the south-east corner to the north-west corner. The steepest part of the site is the south-east corner bounded by Appin and Therry Roads and the existing main entry to the south-east corner of the site. Refer to **Figure 2** for a site plan.

The land is owned by NSW Department of Health. The site is legally described as Lot 6 of DP 1058047.

Campbelltown and Camden Hospitals are the primary public healthcare facilities for residents in the Macarthur region. They provide a range of services including cardiology, maternity, gynaecology, palliative care, paediatrics, mental health, respiratory and stroke medicine, surgery and emergency medicine and aged-care services.



 The Site

Figure 2 Site Plan

Source: Ethos Urban and Google Maps

3.0 Description of proposed development

The SSD application will seek consent for the following work:

- Demolition of Building C, Gna Kalun, Waratah House and part of the front of house areas;
- Construction of a new 11 storey Clinical Services Building to provide:
 - New emergency department;
 - New main hospital entry and drop off;
 - Helipad facilities; and
 - A range of operating suites and facilities for use by ICU, maternity, paediatrics, surgical and mental health.
- Refurbishment of existing buildings, including:
 - Block A: Partial demolition and repurposing;
 - Block B: Partial demolition and shell space fit-out, back of house refurbishment;
 - Block D: Partial demolition and shell space fit-out;
 - Cancer Therapy Centre expansion;
- Construction of new internal access roads and links, including clinical link between Building 1 and D;
- Construction of new 'Hospital Street' and associated landscaping.

Draft Architectural Drawings prepared by Billard Leece Partnership have been provided for information purposes (see **Attachment A**).

4.0 Planning context

4.1 State Environmental Planning Policy (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the Policy provides that State Significant Development includes:

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

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

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

4.2 Environmental Planning and Assessment Act 1979

The Act establishes the assessment framework for SSD. Under Section 4.38 of the Act the Minister for Planning is the consent authority for SSD. Section 4.12(8) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

4.3 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) aims to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development. The BC Act replaces the *Threatened Species Conservation Act 1995* (TSC Act) as the key piece of legislation that identifies and protects threatened species, populations and ecological communities in NSW.

There are several obligations placed on HI in relation to the Proposal. HI must consider threatened species, populations, ecological communities, habitat, key threatening processes, offsets and recovery plans in fulfilling its statutory responsibilities.

It is noted that the site is located within an established urban area of Campbelltown. It is generally cleared of vegetation with a few open grassed areas.

4.4 Other State planning policies

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

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

4.5 Local Environmental Plan

4.5.1 Permissibility

The site is zoned SP2 Infrastructure (Health Services Facility) under the *Campbelltown Local Environmental Plan 2015* (CLEP 2015). Development for the purpose shown on the Land Zoning Map (i.e. health services facility – which includes hospitals) including any development that is ordinarily incidental or ancillary to development for that purpose is permitted with consent under the CLEP 2015.

Clause 57(1) of the *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) allows a health services facility to be permissible in any of the prescribed zones listed in the ISEPP. SP2 is a Prescribed Zone in the ISEPP and therefore permissible with consent.

4.5.2 Zone Objectives

The objectives of the SP2 zone under the CLEP 2015 are:

- To provide for infrastructure and related uses.
- To prevent development that is not compatible with or that may detract from the provision of infrastructure.
- To encourage activities involving research and development.
- To optimise value-adding development opportunities, particularly those associated with research.
- To provide for the retention and creation of view corridors.
- To preserve bushland, wildlife corridors and natural habitat.
- To maintain the visual amenity of prominent ridgelines.

The proposed hospital redevelopment is capable of demonstrating consistency with these objectives.

4.5.3 Height and FSR

There are no maximum Floor Space Ratio or building height controls applying to the site under the CLEP 2015.

4.5.4 Heritage

There are no heritage items applying to the site under the CLEP 2015.

4.5.5 Environmental Constraints

The site is not mapped as having any environmental constraints under the CLEP 2015.

5.0 Overview of likely environmental and planning issues

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

5.1 Traffic and Parking

Traffic analysis will be undertaken to determine the appropriate access arrangements for the site in addition to analysis of parking demand and provision.

5.2 Noise and Vibration

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

5.3 Geotechnical, Contamination and Hazardous Materials

A geotechnical investigation of the site will be undertaken where new buildings are proposed. Recommendations for the substructure of the buildings will be considered in the detailed design of the buildings and will be addressed. Any validation requirements relating to ground conditions to ensure the site is suitable for the intended use will be adopted.

Relevant investigations will be undertaken in accordance with SEPP 55 – Remediation of Land, Managing Land Contamination – Planning Guidelines, and SEPP 33 – Hazardous and Offensive Development. The assessment against the SEPPs will be submitted with the SSD Application.

5.4 Biodiversity

Section 7.9 of the *Biodiversity Conservation Act 2016* requires that an EIS submitted with an SSD application be accompanied by a *biodiversity development assessment report* 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 site has previously been cleared and does not contain any significant vegetation. As such, a waiver is being sought in conjunction with this application from the requirement to prepare a Biodiversity Development Assessment Report for the development.

5.5 Built form

Whilst the site has no maximum height or FSR control, the proposed scheme will be the subject of a merit assessment with regard given to the siting, height and massing of the proposed development in the context of the surrounding landscape.

5.6 Infrastructure and servicing

Consultation will be undertaken with all relevant service providers in relation to any required capacity augmentation of existing services to the site.

6.0 Consultation

In preparing the EIS, consultation will be undertaken with at least the following stakeholders:

- Campbelltown City Council;
- Transport for NSW;
- Roads & Maritime Services; and
- Surrounding landowners and the community.

7.0 Conclusion

The purpose of this letter is to request the SEARs for the preparation of an EIS for the Campbelltown Hospital Redevelopment Stage 2. The proposed development will enable the continuation of the redevelopment of the Campbelltown Hospital, and will further support and strengthen the medical services and health care provided in the growing Campbelltown-Macarthur region.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS.

Yours sincerely

A handwritten signature in black ink, appearing to read "AS" followed by a stylized flourish.

Sam Sangster
Chief Executive