



Northern Beaches Health Service Redevelopment
A new wave in healthcare

Northern Beaches Hospital

Stage 1: Concept Design, Site Clearance & Preparatory Works

Appendix A

Director General's Environmental Assessment Requirements



Planning & Infrastructure

19 June 2013

Mr Sam Sangster
Chief Executive
Health Infrastructure
PO Box 1060
NORTH SYDNEY NSW 2059

Attention: Leoné McEntee

Contact: Peter McManus
Phone: 02 9228 6316
Fax: 02 9228 6540
Email: peter.mcmanus@planning.nsw.gov.au
Our ref: SSI 13_5982
File: 13/09196-1

Dear Mr Sangster

DGRs for Northern Beaches Hospital, Frenchs Forrest [SSI 13_5982]

Please find attached a copy of the Director General's environmental assessment requirements (DGRs) for the preparation of the Environmental Impact Statements (EIS) for the Northern Beaches Hospital staged infrastructure application (SSI 13_5982). These requirements have been prepared in consultation with relevant government agencies based on the information you have provided to date.

I have also attached a copy of the government authorities' comments for your information. Notwithstanding, please be aware that the department is still awaiting endorsed comments from a joint submissions being prepared by the Roads and Maritime Services and Transport for NSW, which when received will be forwarded separately.

Please be advised that the DGRs have been prepared to reflect the proposed staging of the development, including requirements for the Concept Proposal, including Stage 1 site clearance and preparatory works and separate requirements for Stage 2 for the construction of the Northern Beaches Hospital. Please note that the Director-General may alter these requirements at any time.

If you do not lodge an EIS for the proposal within 2 years, you must consult further with the Director General in relation to the preparation of the EIS.

Prior to exhibiting the EIS that you submit for the proposal, the department will review the document in consultation with the relevant agencies to determine if it addresses the requirements in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.

I would appreciate it if you would contact the department at least two weeks before you propose to submit your EIS. This will enable the department to:

- confirm the applicable fee (see Division 1AA, Part 15 of the *Environmental Planning and Assessment Regulation 2000*); and
- determine the number of copies (hard-copy and CD-ROM) of the EIS that will be required for reviewing purposes.

If your proposal is likely to have a significant impact on matters of National Environmental Significance, it will require an approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval would be in addition to any approvals required under NSW legislation and it is your responsibility to contact the Department of Sustainability, Environment, Water, Population and Communities to determine if an approval under the EPBC Act is required (<http://www.environment.gov.au> or 6274 1111).

Your contact officer for this proposal, Peter McManus, can be contacted on 02 9228 6316 or via email at peter.mcmanus@planning.nsw.gov.au. Please mark all correspondence regarding the proposal to the attention of the contact officer.

Yours sincerely



Heather Warton

Director

Metropolitan and Regional Projects North
as delegate for the Director General

Director General's Environmental Assessment Requirements

Section 115Y of the *Environmental Planning and Assessment Act 1979*
Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSI 13_5982 (Concept Proposal, including Stage 1)
Infrastructure Project	<p>Staged development of the Northern Beaches Hospital, including:</p> <ul style="list-style-type: none"> • Staged infrastructure application that sets out the concept proposal for the site; and • Stage 1 site clearance and preparatory works, including biodiversity management.
Location	Frenchs Forest Road West, Frenchs Forest
Proponent	Health Infrastructure
Date of Issue	19 June 2013
General Requirements	<p>The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000.</p> <p>Notwithstanding the key issues specified below, the EIS must include an environmental risk analysis to identify the potential environmental impacts associated with the infrastructure.</p> <p>Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> • adequate baseline data; • consideration of potential cumulative impacts due to other development in the vicinity; and • measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment.
Key issues	<p>The EIS for the staged infrastructure application for the Northern Beaches Hospital, including Stage 1, must address the following specific matters:</p> <p><i>Northern Beaches Hospital Concept Proposal:</i></p> <ol style="list-style-type: none"> 1. Statutory and Strategic Context <ul style="list-style-type: none"> • Consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments. • Address the relevant planning provisions, goals and strategic planning objectives in the following: <ul style="list-style-type: none"> ○ NSW 2021; and ○ Draft Metropolitan Strategy for Sydney to 2031. 2. Concept Proposal Built Form and Urban Design <ul style="list-style-type: none"> • Integration of the development with existing built form through the establishment of appropriate development controls including: <ul style="list-style-type: none"> ○ gross floor area ○ building footprints ○ height and massing/building envelopes • Indicative plans and elevations for the concept proposal to detail design, height, density, bulk and scale, setbacks of the proposal in relation to the surrounding development, topography and streetscape. • Consideration of the overall site layout, axis, vistas and connectivity, open

spaces and edges, interface with the public domain, primary elements and gateways.

3. Amenity

Preliminary analysis of perceived amenity impacts including noise and vibration, solar access, privacy and analysis of significant views and vistas that would be impacted by the concept proposal.

4. Transport and Accessibility

Undertake an assessment of the traffic impact of the concept proposal, with particular regard to:

- existing road capacity, traffic conditions, expected impacts, including consideration of any additional requirements at times when Wakehurst Parkway is flooded
- road and intersection upgrade requirements, including options to offset the impact of the future hospital development on the road network
- determine the adequacy of the development to meet the future demand for increased public transport services
- daily and peak traffic movements and impacts on intersections
- access arrangements to and within the site, including the appropriateness of the location of the main access point
- delivery, servicing and loading arrangements
- pedestrian and bicycle linkages to and within the site
- access for emergency vehicles.

5. Flora and Fauna

- Address impacts on flora and fauna, including known and potentially occurring threatened species, populations and endangered ecological communities, including Duffys Forest EEC, and their habitats, in accordance with DECC's Biodiversity Survey and Assessment: Guidelines for Developments and Activities (2004). Any steps taken to mitigate or offset any identified impacts to the environment should also be detailed in the EIS.
- The EIS should include a detailed survey (using a variety of survey methods by a suitably qualified person) for the threatened flora and fauna likely to be present on the site.

6. Bushfire

A bush fire hazard assessment and report that addresses the requirements of clause 44 of the Rural Fires Regulation 2008 and the requirements for Special Fire Protection Purpose Development as detailed in Planning for Bush Fire Protection 2006 guidelines.

7. Staging

Details regarding the staging of the proposed development.

8. Aboriginal Heritage

The EIS shall address Aboriginal Heritage in accordance with the Draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation 2005 and Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010, where relevant.

9. Heritage

A statement of significance and an assessment of the impact on the heritage significance of any heritage items and/or conservation areas should be undertaken in accordance with the NSW Heritage Manual, where relevant.

10. Contamination

Demonstrate the site is suitable for the proposed land use in accordance with State Environmental Planning Policy No.55 – Remediation of Land.

	<p>11. Drainage Prepare a Stormwater Management Strategy and Plan that addresses drainage associated with the proposal, including stormwater and drainage infrastructure and any augmentation requirements and incorporating water sensitive urban design principles, water harvesting techniques with particular attention to the issue of on site retention/detention. Stormwater drainage should be designed to avoid any adverse impacts on downstream properties.</p> <p>12. Utilities In consultation with relevant agencies the EIS shall address the existing capacity and any augmentation requirements of the development for the provision of utilities including staging of infrastructure through the preparation of an Infrastructure Management Plan.</p> <p>13. Hazards A description of the proposed storage, use and management of any hazardous materials and measures to be implemented to manage hazards and risks associated with the storage.</p> <p>Stage 1 Site Clearance and Preparatory Works:</p> <p>14. Noise and Vibration Identify and provide a quantitative assessment of the main noise and vibration generating sources and activities during stage 1 site clearance and preparatory works. Outline measures to prevent, control, minimise and mitigate noise and vibration impacts on surrounding occupiers of land, including The Forest High School.</p> <p>15. Transport and Accessibility</p> <ul style="list-style-type: none"> • Detail proposed car parking arrangements, including parking requirements for Stage 1 Site Clearance and Preparatory Works. • Provide accurate details of daily vehicle movements and assess the impacts of the traffic generated on the local road network, including impact on nearby intersections and any potential need for upgrade or road works (if required). <p>16. Sediment, Erosion and Dust controls Prepare a Soil and Water Management Plan that details measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles.</p> <p>17. Servicing and Waste</p> <ul style="list-style-type: none"> • Preparation of a Waste Management Strategy that identifies, quantifies and classifies the likely waste streams to be generated during Stage 1 Site Clearance and Preparatory Works and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. • Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site.
Plans and Documents	<p>The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents.</p> <p>In addition, the EIS must include the following:</p> <ul style="list-style-type: none"> • A Quantity Surveyors Certificate; • Details of full-time construction and operational jobs; • Concept Proposal Drawings; • Site Survey Plan, showing existing levels, location and height of existing

	<p>and adjacent structures/buildings and boundaries;</p> <ul style="list-style-type: none"> • Site Analysis Plan; • Stormwater Concept Plan; • Concept Shadow Diagrams; • View Analysis/Photomontages; • Preliminary Construction Management Plan, inclusive of a Preliminary Construction Traffic Management Plan;
Consultation	<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners.</p> <p>In particular you must consult with:</p> <ul style="list-style-type: none"> • Warringah Council; • Roads and Maritime Services; • Transport for NSW; • Office of Environment and Heritage • Environment Protection Authority; • Air Services Australia; • NSW Rural Fire Service; • Local Aboriginal Land Council and stakeholders; and • Local Heritage Group/s, where relevant. <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the infrastructure has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	<p>If you do not lodge an EIS for the infrastructure within 2 years of the issue date of these DGRs, you must consult further with the Director-General in relation to the preparation of the EIS.</p>

ATTACHMENT 1

Technical and Policy Guidelines

The following guidelines may assist in the preparation of the Environmental Impact Statement. This list is not exhaustive and not all of these guidelines may be relevant to your proposal.

Many of these documents can be found on the following websites:

<http://www.planning.nsw.gov.au>

<http://www.bookshop.nsw.gov.au>

<http://www.publications.gov.au>

Policies, Guidelines & Plans

Built Form and Urban Design	Warringah Design Guidelines (Public Spaces) 2013 (Warringah Council)
Flora and Fauna	Threatened species assessment guidelines (OEH)
Ecologically Sustainable Development	NSW Health's Engineering Services and Sustainable Development Guidelines (TS11)
Noise	NSW Industrial Noise Policy (EPA) Interim Construction Noise Guidelines (DECC) Assessing Vibration: a technical guideline (DECC)
Transport	Guide to traffic generating development (RMS) Planning guidelines for walking and cycling EIS Guidelines – road and related facilities (DP&I)
Sediment, Erosion and Dust Control	Managing Urban Stormwater – Soils & Construction Volume 1 2004 (Landcom) Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA)

Director General's Environmental Assessment Requirements

Section 115Y of the *Environmental Planning and Assessment Act 1979*
Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSI 13_5982 (Stage 2)
Infrastructure Project	<p>Staged development of the Northern Beaches Hospital, including:</p> <ul style="list-style-type: none"> • bulk excavation works and sub-level car park; • construction of a new six to ten storey hospital building with approximately 70,000 sqm of gross floor area providing emergency, critical care, operating theatres, acute inpatient, maternity and neonatal, paediatrics and adolescents, mental health care services, ambulatory services, clinical and other support services and associated administrative services; • staff, patient and visitor car parking; • external site works, including landscaping and pathways; • utility services amplification works.
Location	Frenchs Forest Road West, Frenchs Forest
Proponent	Health Infrastructure
Date of Issue	19 June 2013
General Requirements	<p>The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000.</p> <p>Notwithstanding the key issues specified below, the EIS must include an environmental risk analysis to identify the potential environmental impacts associated with the infrastructure.</p> <p>Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> • adequate baseline data; • consideration of potential cumulative impacts due to other development in the vicinity; and • measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment.
Key issues	<p>The EIS for the staged infrastructure application for the construction of the Northern Beaches Hospital must address the following specific matters:</p> <ol style="list-style-type: none"> 1. Statutory and Strategic Context <ul style="list-style-type: none"> • Address the statutory provisions applying to the development contained in all relevant environmental planning instruments. • Address the relevant planning provisions, goals and strategic planning objectives in the following: <ul style="list-style-type: none"> ○ NSW 2021; and ○ Draft Metropolitan Strategy for Sydney to 2031. 2. Built Form and Urban Design <ul style="list-style-type: none"> • Address the height, bulk and scale of the proposed development within the context of the locality, including the existing The Forest High School and adjoining residential development. • Address design quality, with specific consideration of the overall site layout, interface with public infrastructure, axis, vistas and connectivity, open spaces and edges, primary elements, gateways, façade, rooftop,

mechanical plant, massing, setbacks, building articulation, materials, choice of colours, including an assessment against the Crime Prevention Through Environmental Design Principles.

- Provide details demonstrating the relationship with the staged infrastructure approval.

3. Amenity

The EIS must include an assessment of amenity impacts, solar access, acoustic impacts, privacy, servicing requirements, significant views and vistas and wind impacts. A high level of environmental amenity for land uses adjacent must be demonstrated.

4. Ecologically Sustainable Development (ESD)

Detail how the development will incorporate ESD principle.

5. Noise and Vibration

- Identify and provide a quantitative assessment of the main construction and operational noise and vibration generating sources and activities.
- Outline measures to prevent, control, minimise and mitigate noise and vibration impacts on surrounding occupiers of land, including The Forest High School.
- Consideration of feasible and reasonable operational noise mitigation and management measures, including noise barriers, location of emergency services vehicle access, loading dock and waste collection activities and location and operation of mechanical plant equipment.

6. Transport and Accessibility (Construction and Operation)

- Detail proposed access arrangements to the hospital, including augmentation requirements and intersection upgrade treatments, the type and size of vehicles accessing the site, and measures to mitigate any associated pedestrian, cycle or traffic impacts.
- Prepare a Transport Accessibility Study that addresses the following:
 - the proposed access and parking provisions, including an assessment of car parking supply and compliance with the relevant Australian standards and parking codes;
 - demonstrates how users (including workers) of the development will be able to make travel choices that support the achievement of State Plan targets;
 - details existing pedestrian and cycle movements within the vicinity of the site and determine the adequacy of the proposal to meet the likely future demand for increased public transport and pedestrian and cycle access;
 - describe measures to be implemented to promote sustainable means of transport including public transport usage and pedestrian and bicycle linkages, including the provision for bicycle parking, end of trip facilities and preparation of a workplace travel plan as part of a travel demand strategy; and
 - estimate the total daily and peak hour trips generated by the proposed development, including accurate details of the current and future daily vehicle movements and assess the impacts of the traffic generated on the local road network, including intersection capacity and any potential need for upgrading or road works (if required), having regard to local planning controls.

7. Flora and Fauna

Address impacts on flora and fauna, including threatened species, populations and endangered ecological communities and their habitats and steps taken to mitigate any identified impacts to protect the environment.

8. Bushfire

A bushfire hazard assessment and report that addresses the requirements of clause 44 of the NSW Rural Fires Regulation 2008 and the requirements for Special Fire Protection Purpose Development as detail in Planning for Bush Fire Protection 2006 guidelines.

9. Heritage

A statement of significance and an assessment of the impact on the heritage significance of any heritage items, and/or conservation areas should be undertaken in accordance with the guidelines in the NSW Heritage Manual, where relevant.

10. Aboriginal Heritage

The EIS shall address Aboriginal Heritage in accordance with the Draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation 2005 and Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010, where relevant.

11. Utilities

- In consultation with relevant agencies the EIS shall address the existing capacity and any augmentation requirements of the development for the provision of utilities including staging of infrastructure through the preparation of an Infrastructure Management Plan.
- Prepare an Integrated Water Management Plan detailing any proposed alternative water supply, proposed end users of potable and non-potable water, demonstration of water sensitive urban design and water conservation measures.

12. Flooding

Preparation of a emergency response plan to manage floods up to the probable maximum flood (PMF) event level, including details of shelter-in-place arrangements, an assessment of isolation possibility and impacts from the proposed development on the capacity or operation of existing local evacuation routes, and consideration of a flood free access to or from the site in extreme flood events.

13. Drainage

A Stormwater Management Strategy and Plan that addresses drainage associated with the proposal, including stormwater and drainage infrastructure incorporating water sensitive urban design principles, water harvesting techniques with particular attention to the issue of on-site retention/detention and be designed to avoid any adverse impacts on downstream properties.

14. Sediment, Erosion and Dust controls

Prepare a Soil and Water Management Plan that details measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles.

15. Servicing and Waste

Preparation of a Waste Management Strategy that identifies, quantifies and classifies the likely waste streams to be generated during future stages for Hospital Construction Works and operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site.

16. Hazards

A description of the proposed storage, use and management of any hazardous materials and measures to be implemented to manage hazards and risks associated with the storage.

Plans and Documents	<p>The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents.</p> <p>In addition, the EIS must include the following:</p> <ul style="list-style-type: none"> • A Quantity Surveyors Certificate; • Details of full-time construction and operational jobs; • Site Analysis Plan; • Site Survey Plan, showing existing levels, location and height of existing and adjacent structures/buildings and boundaries; • Architectural drawings; • Landscape Plan; • Shadow Diagrams; • Stormwater Concept Plan; • View Analysis/Photomontages; • Preliminary Construction Management Plan, inclusive of a Preliminary Construction Traffic Management Plan; and • Geotechnical and Structural Report.
Consultation	<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners.</p> <p>In particular you must consult with:</p> <ul style="list-style-type: none"> • Warringah Council; • Roads and Maritime Services; • Transport for NSW; • Office of Environment and Heritage • Environment Protection Authority; • Air Services Australia; • NSW Rural Fire Service; • Local Aboriginal Land Council and stakeholders; and • Local Heritage Group/s, where relevant. <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the infrastructure has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	<p>If you do not lodge an EIS for the infrastructure within 2 years of the issue date of these DGRs, you must consult further with the Director-General in relation to the preparation of the EIS.</p>

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**Warringah
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12 June 2013

Mr Peter McManus
Metropolitan and Regional Projects North
NSW Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Peter

Director General's Requirements – Northern Beaches Hospital

Thank you for providing the opportunity to comment on the draft Director General's Requirements (DGRs) for the Northern Beaches Hospital.

The DGRs have been reviewed and whilst they contain a comprehensive list of matters that the proponent will be required to address, there is a need to emphasise that consideration must be given to the broader impacts of the hospital. It is important that the broader local and regional impacts are fully considered and addressed, not just those impacts which are likely to occur in direct vicinity of the development (as prescribed in the draft DGRs). In our opinion, the consideration of these impacts in the preparation of the Environmental Impact Statement (EIS) and the integration of the proposed development with the existing built form and transport networks is seen as critical.

It is requested that the DGRs be amended to include the following:

Key Issues:

Transport and Accessibility:

- The traffic solution needs to be strongly integrated with the hospital design (including future stages). For this reason, the EIS must provide detailed information on future stages to allow for a realistic and thorough assessment to be undertaken on the impacts of the development on the existing road network. Frenchs Forest Road is noted as being a primary access point and is a local (Council owned) road and further discussion is required on the likely upgrades that will be required.
- The traffic solution should not be limited to the intersections immediately surrounding the hospital; the scope needs to be wider to include Warringah Road / Forest Way and Warringah Road / Allambie Road.
- If the local road network is called upon to carry additional traffic volumes during and after construction, the structural capacity of those roads must be assessed and augmentation works identified where required.

- The DGR's for Transport and Accessibility, as specified under the Future Stages – Hospital Construction section, should also be considered as part of the Staged Infrastructure Application.
- The DGRs should specify that the EIS must identify and develop options to offset the impact of the development on the road network, ensuring that the level of delay is improved.
- The DGRs should specify that the EIS must clearly identify all proposed changes to existing infrastructure including proposed upgrades.

In light of the above key issues, it recommended that the DGRs stipulate that Council must be consulted during the preparation of the traffic study and prior to the preparation of the EIS.

In addition to the above-mentioned traffic and accessibility DGRs, it is recommended that 'workers' be added to the DGR relating to travel choices in preparing the Transport Accessibility Study, as follows:

*"demonstrates how users (**including workers**) of the development will be able to make travel choices that support the achievement of State Plan targets".*

Built Form and Urban Design (Part 2):

It is recommended that a requirement be added to ensure that the proposed urban form and the interface with public infrastructure be considered. The built form and urban design should comply with the principles contained within the "Warringah Public Spaces Design Guidelines 2013." A detailed visual impact analysis must be undertaken for all buildings up to 10 storeys.

Flora and Fauna (Part 5):

It is requested that the DGRs be amended to include the following:

The concept proposal is to demonstrate that the following have been considered:

- *The site has significant biodiversity value, in that it is a known and potential habitat for threatened species and ecological communities, and is part of an important wildlife corridor. A large portion of this site contains intact vegetation constituting Duffys Forest Endangered Ecological Community which is listed under the Threatened Species Conservation Act 1995. The site contains known and potential habitat for a range of other threatened species including Tetratheca glandulosa, Pimelea curviflora var. curviflora, Lasiopetalum joyceae, Epacris purpurascens var. purpurascens and Isoodon obesulus obesulus (Southern Brown Bandicoot). Recently, Cercartetus nanus (Eastern Pygmy Possum) and Ninox strenua (Powerful Owl) have been recorded in vegetation adjacent or contiguous to the site. It is recommended that best practice survey techniques are undertaken, including the use of nest box survey for Cercartetus nanus.*

In addition to the above, the proponent should identify the actions required to avoid, mitigate and offset biodiversity loss, including the management of the retained Duffy's Forest EEC within Blinking Light Reserve and the adjoining road reserve.

Future Stages - Hospital Construction Works:

It is noted that the conceptual plans show "future development" and further clarity is required to be provided (as part of Stage 1) to allow the development proposal to be considered holistically.

It is requested that the following be incorporated into the 'Future Stages - Hospital Construction Works' section (Part 13):

"The concept proposal is required to demonstrate that the following has been considered:

Council Stormwater Drainage infrastructure (i.e. pits and pipes) are located at both the Southern and Northern ends of the Bantry Bay Road proposed road closure. These pits and pipes will require decommissioning and additional stormwater drainage upgrade works will be required at these intersection locations with Frenchs Forest Rd and Warringah Rd".

Plans & Documents:

It is requested that the following be incorporated into the Plans and Documents section:

- *A Biodiversity Management Plan; detailing strategies to manage the vegetation on site and any offsetting arrangements need to be included with the EIS. This is to include confirmation from OEH that the Biobanking Assessment Methodology has been applied appropriately in relation to any proposed BioBanking or Offset strategies.*

Policies, Guidelines & Plans

It is requested that the following be incorporated into the Policies, Guidelines & Plans and section:

- Warringah Development Control Plan 2011
- Warringah Pedestrian Access & Mobility Plan 2011
- Warringah Public Spaces Design Guidelines 2013
- Warringah Bike Plan 2010
- Warringah's Engineering Specifications for Civil Works (Aus-Spec)
- Warringah Aquatic Centre (draft) Masterplan 2013
- Warringah Natural Area Survey
http://www.warringah.nsw.gov.au/environment/natural_area_survey.aspx
- Warringah Local Habitat Strategy
http://www.warringah.nsw.gov.au/publications/documents/LocalHabitatStrategyWEB_000.pdf
- Building over or adjacent to constructed Council drainage systems and easements: PAS-PL 130 http://www.warringah.nsw.gov.au/pdf/Policies/PAS-PL_130.pdf

- Bushland: ENV-PL 005
<http://www.warringah.nsw.gov.au/publications/documents/ENV-PL005BushlandPolicy.pdf>
- Environmental Sustainability: STR-PL 830
http://www.warringah.nsw.gov.au/pdf/Policies/STR-PL_820.pdf
- Water Sensitive Urban Design: STR-PL 820
http://www.warringah.nsw.gov.au/pdf/Policies/STR-PL_820.pdf

Consultation:

It is noted that the proponent is required to consult with Council in the preparation of the EIS. Council strongly supports this requirement.

Further Consultation after 2 years:

Council supports the 2 year period, as specified in the draft DGRs.

Thank you again for providing the opportunity to comment on the draft DGRs. I trust the information provided is of assistance. Should you require further information, please contact Mike Haynes, Manager Strategic Planning on (02) 9942 2746.

Yours faithfully



David Kerr
Group Manager Strategic Planning

Chris Wilson
Executive Director
Development Assessment Systems & Approvals
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

CC: Peter McManus

**REQUEST FOR DIRECTOR GENERALS REQUIREMENTS (DGRs)
THE NORTHERN BEACHES HOSPITAL (SSI 13_5982), FRENCHS FOREST**

Dear Mr Wilson,

Thank you for your Department's request via email dated 31 May 2013 for Transport for NSW to provide input into the draft Director Generals Requirements (DGRs) for the subject proposal.

Transport for NSW has reviewed the draft DGRs together with the submitted Concept Plans for the above proposal. Transport for NSW supports the contents of the draft DGRs but would like your Department to consider the following additional requirements to be addressed by the proponent in the preparation of the Environmental Assessment :

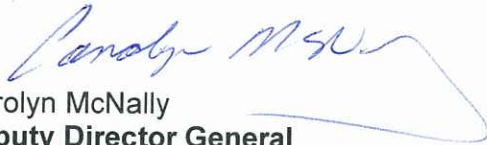
- Determine how the site will integrate with the existing and future transport network including the following:
 - Ensure safe and efficient access within the site and to the transport network for users of all transport modes
 - Access arrangements to and within the site, including the appropriateness of the location of the main access point
 - Access for emergency vehicles, including any additional requirements at times when Wakehurst Parkway is flooded
 - Delivery, servicing and loading arrangements
- Prepare a Workplace Travel Plan for the site as part of a Travel Demand Management Strategy to reduce demand for access to the site by private car, encourage access by sustainable travel modes and contribute to meeting State Plan travel targets
- Adequacy of bicycle parking and associated end of trip facilities in the design of the hospital
- Assessment of parking supply and strategy to manage the impacts of hospital parking on the surrounding road network
- Preparation of a construction management plan; including the provision of a traffic

management plan for all demolition/construction activities, detailing vehicle routes, number of trucks, hours of operation and traffic control measures

Transport for NSW would appreciate the opportunity to meet with representatives of both Health Infrastructure and your Department to clarify the aforementioned requirements and responsibilities during the preparation of the specialist studies for the current and any subsequent Staged Infrastructure Application for the abovementioned site.

Should you have any questions regarding this matter, please contact Aleks Tancevski on 8202 2811 or Aleks.Tancevski@transport.nsw.gov.au

Yours sincerely,



Carolyn McNally
Deputy Director General
Planning and Programs

20-6-13



Office of Environment & Heritage

Your reference SSI 13_5982
Our reference: DOC13/25643

Mr Peter McManus
Senior Planner, Metropolitan and Regional Projects North
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Peter McManus

Dear Mr McManus

I refer to your email received 31 May 2013, requesting input from the Office of Environment and Heritage (OEH) to the Director General's Environmental Assessment Requirements for the proposed Northern Beaches Hospital, Frenchs Forest (SSI 13_5982).

Flooding

The EIS should include a preliminary hydrological and hydraulic assessment for flooding including overland flow paths associated with major drainage for the proposed development, adjacent areas and proposed staging of the development. The assessment is to comprise:

- The impact of flooding on the proposed development and any flood risk to people and properties for the full range of the floods up to the probable maximum flood (PMF) event including potential long term cumulative impacts from staged development. This assessment should address any relevant provisions of the *NSW Floodplain Development Manual (2005)* including the potential impacts of sea level rise and increases in rainfall intensity due to climate change.
- Details of the drainage associated with the proposal, including stormwater drainage infrastructure. The proposal shall address the impact of stormwater flows on the site from other catchments, overland flow paths and mainstream flooding.
- An assessment of any possible impact of the proposed development on the flood behaviour (i.e. levels, velocities and duration of flooding) and the impact of the proposed development on adjacent, downstream and upstream areas.
- An assessment of the impacts of earthworks and filling of land within the proposed development. This assessment should be based on an understanding of staging development and cumulative flood impacts.
- A detailed emergency response plan to manage floods up to the PMF level given that the proposal is considered a critical facility that should remain functional during all emergencies. This plan should also include shelter-in-place arrangement, an adequate assessment of isolation possibility and the impacts from the proposed development on the capacity or operation of existing local evacuation

routes. Additionally, this plan should include consideration of a flood free access to or from the development site in extreme flood events.

The preliminary hydrological and hydraulic assessment should be consistent with the Narrabeen Lagoon Flood Study and Manly Lagoon Flood Study currently being prepared by Warringah Council.

Relevant Policies and Guidelines

- NSW Government Flood Prone Land Policy (1984) as set out in the Floodplain Development Manual (2005).
- "Practical Consideration of Climate Change" (DECCW, 2007).
- NSW Coastal Planning Guideline: "Adapting to Sea Level Rise" (August 2010) and related guidelines entitled: "Flood Risk Management Guide" and "Coastal Risk Management Guide".
- Section 117(2) Local Planning Direction 4.3 "Flood Prone Land".
- Planning circular PS 07-003 "New guideline and changes to section 117 direction and EP&A Regulation on flood prone land".

Biodiversity

OEH recommends the DGR relating to flora and fauna be amended to read:

The EIS should address impacts on flora and fauna, including threatened species, populations and endangered ecological communities, including Duffy's Forest EEC, and their habitats, in accordance with DECC *"Biodiversity Survey and Assessment: Guidelines for Developments and Activities" 2004 working draft* and any relevant draft or final recovery plans. Any steps taken to mitigate or offset any identified impacts to the environment should also be detailed in the EIS. Include in the EIS a detailed survey (using a variety of survey methods by a suitably qualified person) for the threatened flora and fauna likely to be present on the site.

The following should be included in the assessment:

- Duffy's Forest EEC is known to occur on site. A detailed map should be prepared identifying the extent of this EEC to inform any offsetting process.
- Powerful Owls have been recorded in the immediate vicinity and should be surveyed for to determine how the species uses the site.
- Pygmy Possum is recorded in the area and should be surveyed for given the occurrence of suitable habitat on site.
- Grey Headed Flying Fox are likely to use the site when forage trees are flowering/fruitleting. Surveys should determine if this is occurring and to what extent.
- Red Crowned Toadlet is known to occur in the area and in Duffy's Forest EEC. It should be surveyed for on site.
- *Grevillea Caley* is recorded in the area and occurs in Duffy's Forest EEC. Surveys should be conducted for this species.
- *Tetratheca Glandulosa* is associated with shale-sandstone transition habitat and there are records nearby. It should be surveyed for on site.
- The significance of the site as a regional corridor should also be assessed.
- Habitat to be destroyed, including hollow-bearing trees should be assessed.

OEH recommends that the Biobanking Assessment Methodology (BBAM) be used to calculate the ecological values required to offset the on-site losses.

Aboriginal Cultural Heritage

The request for DGRs mentions that an Aboriginal cultural heritage assessment has been undertaken for the project and will be included with the EIS. At this stage, OEH has not had the opportunity to review this assessment and as such, cannot make specific recommendations regarding draft DGR 9, apart from saying that OEH concurs with DGR 9 as it currently exists, which requires the proponent to assess and manage Aboriginal heritage issues in accordance with the *Draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation 2005* and *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

If you have any queries please contact Liz Peterson, Senior Regional Operations Officer on 9995 6841.

Yours sincerely

S. Harrison 14/06/13

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney Region
Regional Operations



Your reference: SSD 5356
Our reference: DOC13/958, FIL13/5639
Contact: J Goodwin 9995 6838

Peter McManus
Department of Planning and Infrastructure
GPO BOX 39
SYDNEY 2001

Dear Mr McManus

SSI 13_5982 – PROPOSED NORTHERN BEACHES HOSPITAL – CONCEPT PLAN AND STAGE1

I am writing to you in reply to your invitation to the EPA to provide input to the Director General's Requirements for the staged development of the above proposal.

The environmental impact assessment (EIA) should assess, quantify and report on:

- Soil and groundwater contamination;
- Air quality (including dust emissions during construction);
- Noise and vibration during construction and operational phases of the project;
- Water quality impacts (including water conservation and re-use opportunities);
- Waste management in the context of the waste management hierarchy;
- Soil erosion and sedimentation particularly during the construction phase;
- Energy conservation; and
- Cumulative environmental impacts.

The proponent should ensure that the EIA is sufficiently comprehensive and detailed to allow the EPA to determine the extent of the impact(s) of the proposal. The EIA should both:

- (a) describe mitigation and management options that will be used to prevent, control, abate or minimise identified environmental impacts associated with the project and to reduce risks to human health and prevent the degradation of the environment; and
- (b) include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

The EPA has identified the following site specific concerns based on the information (including the draft DGRs) supplied to it by Department of Planning and Infrastructure in its email dated 30 May 2013:

- (a) a detailed assessment of potential site contamination following demolition of existing buildings, and infrastructure, including information about groundwater and any de-commissioned underground fuel storage tank;

- (b) handling, transport and disposal of any asbestos waste;
- (c) operational assessment, storage, handling, transport and disposal of 'clinical and related wastes';
- (d) construction-related noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work);
- (e) site preparation and construction phase dust control and management,
- (f) site preparation and construction phase erosion and sediment control and management;
- (e) operational noise and vibration impacts on noise sensitive receivers (especially surrounding residences and The Forest High School) arising from operational activities such as emergency service vehicle movements, waste collection, loading dock activities, mechanical services (especially air conditioning plant) and standby generator testing and operation; and
- (f) feasible and reasonable operational noise mitigation and management measures, including noise barriers and location of emergency service vehicle access.

The EPA expands on its concerns in Attachment A to this letter.

Should you require clarification of any of the above please contact John Goodwin on 9995 6838.

Yours sincerely



FRANK GAROFALOW
Manager, Metropolitan Infrastructure
NSW Environment Protection Authority
encl. Attachment A

ATTACHMENT A

- ENVIRONMENT PROTECTION AUTHORITY COMMENTS –

NORTHERN BEACHES HOSPITAL CONCEPT PLAN AND STAGE 1

1. General

The EPA considers that the project comprises two distinct phases (construction and operational) and has set out its comments on that basis.

The EPA understands that Manly Area Health Service facilities buildings have been demolished and removed from the land and that Bantry Bay Road has been acquired but not demolished. The EPA further understands there are no known underground fuel storage tanks on the land. Or whether, the proponent engaged a site auditor accredited under the Contaminated Land Management Act 1997 to assess site contamination.

The EPA notes the proximity of The Forest High School and residences along Frenchs Forest Road.

2. Construction phase

The construction phase is proposed over 3 years between 2015 and 2018. The EPA anticipates a range of environmental impacts during the construction phase of the development which should be comprehensively addressed in detail by the environmental assessment.

The EPA anticipates that construction and construction-related activities will be undertaken in an environmentally responsible manner with particular emphasis on –

- detailed site contamination investigation and remediation,
- compliance with recommended standard construction hours,
- waste management consistent with the hierarchy of re-use, recycle and then disposal as the last resort,
- 'special waste' management (i.e. asbestos),
- feasible and reasonable noise and vibration minimisation and mitigation,
- intra-day respite periods from high noise generating construction activities (including jack hammering, rock breaking, pile boring or driving, saw cutting and vibratory rolling),
- effective dust control and management, and
- effective erosion and sediment control.

2.1 Site investigation and remediation

The EPA considers that given the proposed use, the EIA should provide sufficient information on the contamination status of soils and groundwater to enable it to provide meaningful comments.

For instance, the EIA should include detailed information about –

- (a) groundwater (example: depth and likely impact to groundwater),
- (b) fill material,
- (c) potential impacts from demolished buildings and infrastructure, and
- (d) de-commissioning any underground storage tanks that may be located on the site.

The proponent should commit in the EIA to engaging a site auditor accredited under the Contaminated Land Management Act 1997.

2.2 Waste control and management (general)

The proponent should manage waste in accordance with the waste management hierarchy. The waste hierarchy, established under the Waste Avoidance and Resource Recovery Act 2001, is one that ensures that resource management options are considered against the following priorities:

Avoidance including action to reduce the amount of waste generated by households, industry and all levels of government

Resource recovery including reuse, recycling, reprocessing and energy recovery, consistent with the most efficient use of the recovered resources

Disposal including management of all disposal options in the most environmentally responsible manner.

All wastes generated during the project must be properly assessed, classified and managed in accordance with the EPA's guidelines to ensure proper treatment, transport and disposal at a landfill legally able to accept those wastes.

The EPA further anticipates that, without proper site controls and management, mud and waste may be tracked off the site during the course of the project.

Recommendation

The proponent should commit to ensuring that :

- (1) all waste generated during the project is assessed, classified and managed in accordance with the "*Waste Classification Guidelines Part 1: Classifying Waste*" (Department of Environment Climate Change and Water, December 2009);
- (2) the body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer; and
- (3) mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises.

2.3 Special waste (asbestos sheeting)

The EIA should confirm whether post-demolition asbestos containing material is evident on the site and the measures should it be encountered during the site preparation and construction phases.

The proponent should commit to satisfying the requirements of the Protection of the Environment Operations ('Waste Regulation) 2005 with particular reference to 'special wastes'. The EPA provides additional guidance material at its web-site <http://www.environment.nsw.gov.au/waste/asbestos/index.htm>.

The proponent should commit to consulting with Workcover NSW concerning the handling of any asbestos waste.

2.4 Dust control and management

The EPA considers dust control and management to be an important air quality issue during site preparation and subsequent construction. Bulk earthworks inevitably generate dust as a result of –

- (a) the excavation, processing and handling of excavation spoil,
- (b) wind action on spoil stock piles, and
- (c) wind action on and plant movement across areas bare of vegetation or other cover.

The proponent should commit to:

- (a) minimising dust emissions on the site, and
- (b) preventing dust emissions from the site.

2.5 Erosion and sediment control

The Managing Urban Stormwater Soils and Construction, 4th Edition published by Landcom (the so-called 'Blue Book') provides guidance material for achieving effective erosion and sediment control on construction sites.

The EPA emphasises the importance of –

- (a) not commencing earthmoving or vegetation removal until appropriate erosion and sediment controls are in place, and
- (b) daily inspection of erosion and sediment controls which is fundamental to ensuring timely maintenance and repair of those controls.

2.6 noise and vibration

The EPA considers that the project is likely to generate significant noise and vibration impacts on surrounding residences, the adjoining high school and other noise sensitive land uses during construction. Guidance material is available on the EPA web site including downloadable copies of –

- the Interim Construction Noise Guideline (2009), and
- Assessing Vibration: a technical guideline (2006).

The proponent should commit to –

- (a) identifying surrounding noise sensitive land uses, and
- (b) undertaking a noise and vibration impact assessment of construction activities, especially any such activities –
 - (i) likely to generate noise with annoying or intrusive characteristics, or
 - (ii) proposed to be undertaken outside the recommended standard hours discussed in Table 1 to the *Interim Construction Noise Guideline*.

2.6.1 construction hours (including respite periods)

Whilst ICNG recommended standard hours for construction (outside of which long experience shows increasing levels of community concern about construction noise impacts) the EPA accepts that certain emergency work may need to be undertaken urgently (other than during the standard recommended hours) in order to avoid –

- loss of life,
- damage to property, or
- environmental harm.

ICNG section 4.5 specifies construction activities proven to be particularly annoying and intrusive to nearby residents and school students. The EPA anticipates that those activities generating noise with particularly annoying or intrusive characteristics would be subject to a regime of intra-day respite periods where –

- (a) they are only undertaken over continuous periods not exceeding 3 hours with at least a 1 hour respite every three hours, and.
- (b) 'continuous' means any period during which there is less than an uninterrupted 60 minute respite between temporarily halting and recommencing any of the work referred to in ICNG section 4.5

The proponent should commit to :

- (a) complying with the standard construction hours as recommended in Table 1 Chapter 2 of the Interim Construction Noise Guideline, July 2009;
- (b) scheduled intra-day 'respite periods' for construction activities identified in the Interim Construction Noise Guideline as being particularly annoying to surrounding residents and other noise sensitive receivers (the Forest High School); and
- (c) adopting special 'examination-time' arrangements in negotiation with the Forest High School.

2.6.2 reversing and movement alarms

The EPA has identified the noise from 'beeper' type plant movement alarms to be particularly intrusive and is aware of feasible and reasonable alternatives. Transport for NSW (nee Transport Construction Authority), Barangaroo Delivery Authority/Lend Lease and Leighton Contractors (M2 Upgrade project) have undertaken safety risk assessments of alternatives to the traditional 'beeper' alarms. Each determined that adoption of 'quacker' type movement/reversing alarms instead of traditional beepers on all plant and vehicles would not only maintain a safe workplace but also deliver improved outcomes of reduced noise impacts on surrounding residents.

Interim Construction Noise Guideline Appendix C provides additional background material on this issue.

The proponent should commit to undertaking a safety risk assessment of construction activities 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.

3. Operational phase

The Hospital will represent a significant long-term infrastructure investment with concomitantly long-term environmental impacts.

The EPA considers that environmental impacts that arise once the new hospital facilities commence operation can largely be averted by responsible environmental management practices, particularly with regard to:

- (a) feasible and reasonable noise avoidance and minimisation.
- (b) proper assessment, storage, handling, transport and disposal of wastes, especially clinical and cytotoxic waste; and
- (c) energy and water conservation.

3.1 Noise and vibration impacts

EPA is aware from long experience that significant risks of unacceptable noise impact arise from inadequate noise management and mitigation measures. The EPA has been obliged to undertake extensive investigation of ongoing complaints about noise from air conditioning plant associated with newly commissioned hospital buildings; most recently Royal North Shore Hospital acute services building.

The EPA anticipates that the proposed facilities are likely to change the nature and intensity of noise impacts on surrounding noise sensitive receivers (example: residences and The Forest high school). The *NSW Industrial Noise Policy, January 2000* (INP) provides guidance material on noise impact assessment.

The proponent should ensure that the EIA is sufficiently comprehensive and detailed to allow the EPA to determine the extent of any noise and vibration impact(s) of the proposal. The EIA should both:

- (a) describe mitigation and management options that will be used to prevent, control, abate or minimise identified noise and vibration impacts to reduce risks to human health and prevent the degradation of the environment; and
- (b) include an assessment of the effectiveness and reliability of the mitigation and management measures and any residual impacts after these measures are implemented.

The EIS should include a comprehensive assessment of noise and vibration impacts associated with operation of the hospital its various stages of development together with design for feasible and reasonable noise impact avoidance and mitigation, including but not limited to:

- (a) potential sleep disturbance impacts on surrounding residents and child care facilities (if any);
- (b) the need to apply 'modifying factors' (see INP chapter 4) to noise monitoring data and associated noise impact assessment;
- (c) likely noise impacts on residences and the high school of where the emergency service vehicle and parking area accesses are to be located;
- (d) noise shielding of residences and the high school from on site parking (including emergency vehicle manoeuvring and parking/holding areas;
- (e) noise compliance monitoring of mechanical plant noise during commissioning, can largely avoid unintended noise and vibration impacts.
- (f) design of loading docks and waste collection areas to –

- (i) avoid or minimise the activation of vehicle reversing alarms during use of those facilities, or
 - (ii) adequate noise shielding of surrounding noise sensitive receivers, especially residences and the high school, from noise generated during activities associated with those facilities;
- (g) adequate design, selection and maintenance of noise generating mechanical services (especially air handling plant and equipment and automated valves) and associated rooms and enclosures;
- limiting the hours of operation of loading dock and waste collection activities outside 'day-time' hours, being 7.00 am to 6.00 pm Monday to Saturday and 8.00 am to 6.00 pm Sundays and public holidays);
 - negotiating with residents and the high school the times at which standby emergency generators are tested and fire alarms are tested

The proponent should commit to averting unacceptable noise impacts on surrounding noise sensitive receivers by –

- preparing a detailed operational noise impact statement that incorporates feasible and reasonable measures to avoid, minimise and manage noise and incorporating those noise avoidance and minimisation measures at the design stage of the project,
- establishing and fostering a good relationship with noise sensitive receivers, especially surrounding residents and the high school (including facilitation of the logging noise complaints and obtaining an active and timely response to those complaints);
- undertaking a noise monitoring program to 'ground truth' noise impact predictions at set periods following commencement of operation of the new facilities;
- restricting loading dock, waste collection and standby emergency generator testing activities to 'day-time' as defined in the NSW Industrial Noise Policy, January 2000;
- undertake a noise monitoring program at various periods after commencement of operation of the each project element to verify that measured noise levels do not exceed levels predicted in the required noise impact statement and acceptable noise levels identified in the NSW Industrial Noise Policy, January 2000.

3.2 Clinical and related waste

The EPA anticipates that the proposed facilities will generate 'clinical and related waste' which are defined under the Protection of the Environment Operations Act 1997. Clinical and related waste includes clinical waste; cytotoxic waste; pharmaceutical, drug or medicine waste; and sharps waste.

Clinical and related waste has been pre-classified as a 'special waste'. This allows the EPA to set more stringent and specific requirements for the transport and management of the waste to minimise the risk to the environment and human health. Clause 43 to the Protection of the Environment Operations (waste) Regulation 2005 prescribes requirements for managing certain clinical and related waste.

Waste managers/operators who transport, store, treat or dispose of clinical and related waste should check the details of the Protection of the Environment Operations Act and the Protection of the Environment Operations (Waste) Regulation 2005 for licensing and generic requirements in relation to clinical waste.

The proponent should commit in the EIA to proper assessment, handling, storage, transport, treatment and disposal of clinical and related waste arising from operation of the new facilities to ensure compliance with

Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (Waste) Regulation 2005.

3.3 Energy and Water Conservation

The EIA should include identification and evaluation of practical opportunities to minimise energy and water use.

All communications to be addressed to:

Headquarters
15 Carter Street
Lidcombe NSW 2141

Headquarters
Locked Bag 17
Granville NSW 2142

Telephone: 1300 679 737
Email: csc@rfs.nsw.gov.au



Director General
NSW Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Your Ref: SSI 13_5982
Our Ref: S13/0023
DA13060687680 GB
ID:87680/81268/5

Attention: Peter McManus

12 June 2013

Dear Sir/Madam,

**Request for DGRs for the Northern Beaches Hospital – Frenchs Forest
(SSI 13_5982)**

I refer to your letter dated 3 June 2013 requesting input on the Director General's environmental assessment Requirements for the proposed Northern Beaches Hospital at Frenchs Forest.

The NSW Rural Fire Service has reviewed the plans and information submitted and provides the following comments.

- The EEC located on the east of the site should be managed to the standard of an asset protection zone.
- The buildings located on the eastern part of the site should be setback from the bush fire hazard in accordance with *Planning for Bush Fire Protection 2006* Table A2.6. Without detailed plans no assessment can be made at this stage.
- Further advice is required on the use of the remainder of the Northern Beaches Hospital Precinct located to the east of Wakehurst Parkway and south of Warringah Road. The removal or suitable management of the vegetation may result in the development site not being considered bush fire prone land.

For any enquiries regarding this correspondence please contact Garth Bladwell.

Yours sincerely

Mark Hawkins
**Acting Team Leader
Development Assessment and Planning**

7 June 2013

ATTENTION: PETER MCMANUS

Ms Heather Warton
Director, Metropolitan & Regional Projects North
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Director General Requirements – Northern Beaches Hospital, Frenchs Forest

Dear Ms Warton,

Thank you for your letter of 21 May 2013 requesting details of key issues and assessment requirements for the development of the Northern Beaches Hospital, Frenchs Forest. Sydney Water has reviewed the preliminary environmental assessment and provides the following comments for the Department's consideration.

Sydney Water requirements for Environmental Assessment

To provide the developer with detailed servicing advice Sydney Water needs the environmental assessment to include the following:

1. *Integrated Water Management Plan* – the Integrated Water Management Plan should include any proposed alternative water supply, proposed end uses of potable and non-potable water, demonstration of water sensitive urban design and any water conservation measures.
2. *Infrastructure Management Plan* – the developer needs to provide Sydney Water with information on the required water and wastewater services, and any augmentation that may be required for the proposed development. This will allow Sydney Water to determine the impact of the proposed development on its existing services and identify any augmentation requirements. When determining landscaping options, the developer should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes.

Sydney Water Servicing

Sydney Water will further assess the impact of individual developments when the proponent applies for a Section 73 Certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess if amplification and/or changes to the system are applicable. Sydney Water requests the Department of Planning to continue to instruct proponents to obtain a Section 73 Certificate from Sydney Water.

The proponent must fund any adjustments needed to Sydney Water infrastructure as a result of any development. The proponent should engage a Water Servicing Coordinator to get a Section 73 Certificate and manage the servicing aspects of the development. Details are available from any Sydney Water Customer Centre on 13 20 92 or Sydney Water's website at www.sydneywater.com.au.

Sydney Water e-planning

Sydney Water has created a new email address for planning authorities to use to submit statutory or strategic planning documents for review. This email address is urbangrowth@sydneywater.com.au. The use of this email will help Sydney Water provide advice on planning projects faster, in line with current planning reforms. It will also reduce the amount of printed material being produced. This email should be used for:

- Section 62 consultations under the Environmental Planning and Assessment Act 1979
- consultations where Sydney Water is an adjoining land owner to a proposed development
- Major Project applications under Part 3A of the *Environmental Planning and Assessment Act 1979*
- consultations and referrals required under any Environmental Planning Instrument
- draft LEPs, SEPPs or other planning controls, such as DCPs
- any proposed development or rezoning within a 400m radius of a Sydney Water Wastewater Treatment Plant
- any proposed planning reforms or other general planning or development inquiries

If you require any further information, please contact Corrine Manyweathers of the Urban Growth Branch on 02 8849 4014 or e-mail corrine.manyweathers@sydneywater.com.au

Yours Sincerely



Adrian Miller
Manager, Growth Strategy
Urban Growth