

PLANNING PROPOSAL

To rezone 23-27 Lytton Street,
Wentworthville:

from R2 Low Density Residential
to R4 High Density Residential

October 2015



CONTENTS

INTRODUCTION	1
PART 1: OBJECTIVES AND INTENDED OUTCOMES	5
PART 2: EXPLANATION OF PROVISIONS	6
PART 3 JUSTIFICATION	8
THE PLANNING PROPOSAL AND DEVELOPMENT CONCEPT	8
SECTION A - NEED FOR THE PLANNING PROPOSAL	12
SECTION B - RELATIONSHIP TO STRATEGIC PLANNING FRAMEWORK	13
SECTION C - ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT	18
SECTION D - STATE AND COMMONWEALTH INTERESTS	20
PART 4 MAPPING	20
PART 5 COMMUNITY CONSULTATION	20
PART 6 PROJECT TIMELINE	21
APPENDIX LIST	21

Introduction

This Planning Proposal arose from an application, as a Planning Proposal request, from Ramsay Health Care (the Proponent). The application sought to amend the strategic planning controls affecting their property at 23-27 Lytton Street, Wentworthville (the Site) under Holroyd Local Environmental Plan 2013 (Holroyd LEP 2013) as follows:

- To rezone from R2 Low Density Residential to R4 High Density Residential.
- To increase the maximum building height from 9 metres to 15 metres.
- To increase the floor space ratio (FSR) from 0.5:1 to 1:1.

The outcome sought from the amended planning controls, per Planning Proposal application, is to enable the expansion of the existing “Health Service Facility” being the Northside West Clinic (Clinic). While a Health Services Facility is a prohibited use under the current R2 Low Density Residential zoning, the Clinic is currently operating under “Existing Use Rights”. Under those Existing Use Rights, significant expansion of that prohibited use is not permitted. However, under the Infrastructure State Environmental Planning Policy (Infrastructure SEPP) a Health Service facility is a permissible activity within a prescribed zone – which includes an R4 High Density Residential zone. Therefore, with the rezoning of the site to R4 High Density Residential and applying the provisions of the Infrastructure SEPP, the existing Clinic will be located within an appropriate zone that will enable its expansion and so contribute to addressing a community medical need. The associated increase in building height and FSR are to achieve alignment with the R4 High Density Residential zoning and to support the functional needs of new services envisaged within the expanded facility.

This Planning Proposal, and the accompanying Proponent’s Planning Proposal application (Appendix A), have been prepared in accordance with Section 55 of the *Environmental Planning and Assessment Act 1979* (the Act) and relevant Department of Planning & Environment Guidelines.

Health Centre Facility – Current Operation and Development Concept

Northside West Clinic is a private mental health care hospital operated by Ramsay Health Care. The Clinic is a member of The Northside Group, which also operates the Northside Clinic at Greenwich and Northside Cremorne Clinic at Cremorne.

The Clinic is a single building of two (2) storeys. The Clinic provides ground floor consulting and treatment rooms for in- and out- patients, as well as 43 in-patient accommodation. The Clinic provides specialised treatments by a team of health professionals in drug & alcohol addiction, and general mental health disorders. The Clinic is soon to offer focussed services within a 30-bed annex to the existing building (under construction – scheduled for completion September 2015).

Loading and servicing for the hospital is located at the southern end of the building. Staff, patient and visitor parking is provided adjacent to the building at the north and south ends. Both the loading / service and the car park are accessed via Lytton Street. The car parks and property boundaries are vegetated, providing screening to surrounding land uses.

The outcome of the Planning Proposal is to enable the construction and use of a new hospital building which is to provide rehabilitation treatment services. The building is envisaged, in the Development Concept, as being located to the south of the existing hospital building, and as having three (3) storeys, with rooftop plant / equipment and basement car parking. The ground level is to consist of patient consulting and rehabilitation areas, common areas and staff / administration rooms. The first and second floors are to provide in-patient accommodation (sleeping area with ensuite), common rooms and service areas.

Land to Which the Planning Proposal Applies

Site Description

The Site of this application is located at 23-37 Lytton Street, Wentworthville, formally described as Lot 1 in Deposited Plan 787784 (refer Figure 1 and Figure 2). The lot area is approximately 6,655m². The Site boundaries are as follows:

- The eastern boundary of the Site faces Lytton Street (approximately 107m) with low density residential properties beyond, and is zoned for R2 Low Density Residential in the Holroyd LEP 2013.
- The northern boundary faces existing low density residential properties, yet zoned for R4 High Density Residential under the Holroyd LEP 2013.
- The southern boundary faces a narrow recreation reserve. Beyond the reserve to the south are low density residential properties, zoned for R2 Low Density Residential in the Holroyd LEP 2013.
- The western boundary faces an open space corridor (zoned RE1 Public Recreation in the Holroyd LEP 2013) known as Lytton Street Park. This corridor contains Finlayson Creek, which is a constructed drainage channel at this location. Lytton Street Park connects with the recreation reserve of the southern boundary.

The Site is affected by a 1 in 100 year flood event, and is located within flood prone land, associated with Finlayson Creek. The topography of the site, and overland (sheet) flow, is downward from the eastern side of Lytton Street over the site and down to Finlayson Creek stormwater (concrete) drain.



Figure 1: Location of Site

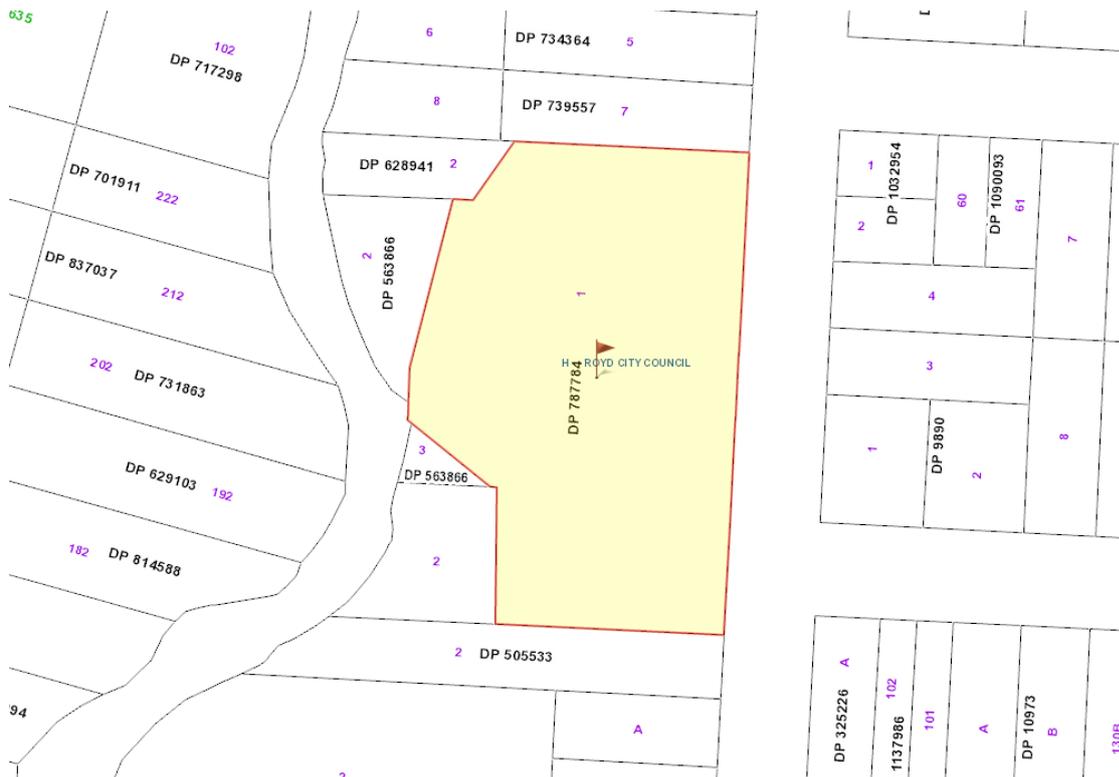


Figure 2: Site Cadastral map

Site Context

The Site is located approximately 500m south-east of the Wentworthville local centre within Holroyd Local Government Area (LGA). The Site is approximately 3 km (direct) west of the Parramatta CBD and approximately 29 kilometres (direct) west of the Sydney CBD.

The Site and local area is serviced by the western rail corridor to the north and associated Wentworthville railway station to Parramatta CBD, Cumberland Highway to the west and the Great Western Highway to the south. Regular bus services run throughout the area departing from the railway station.

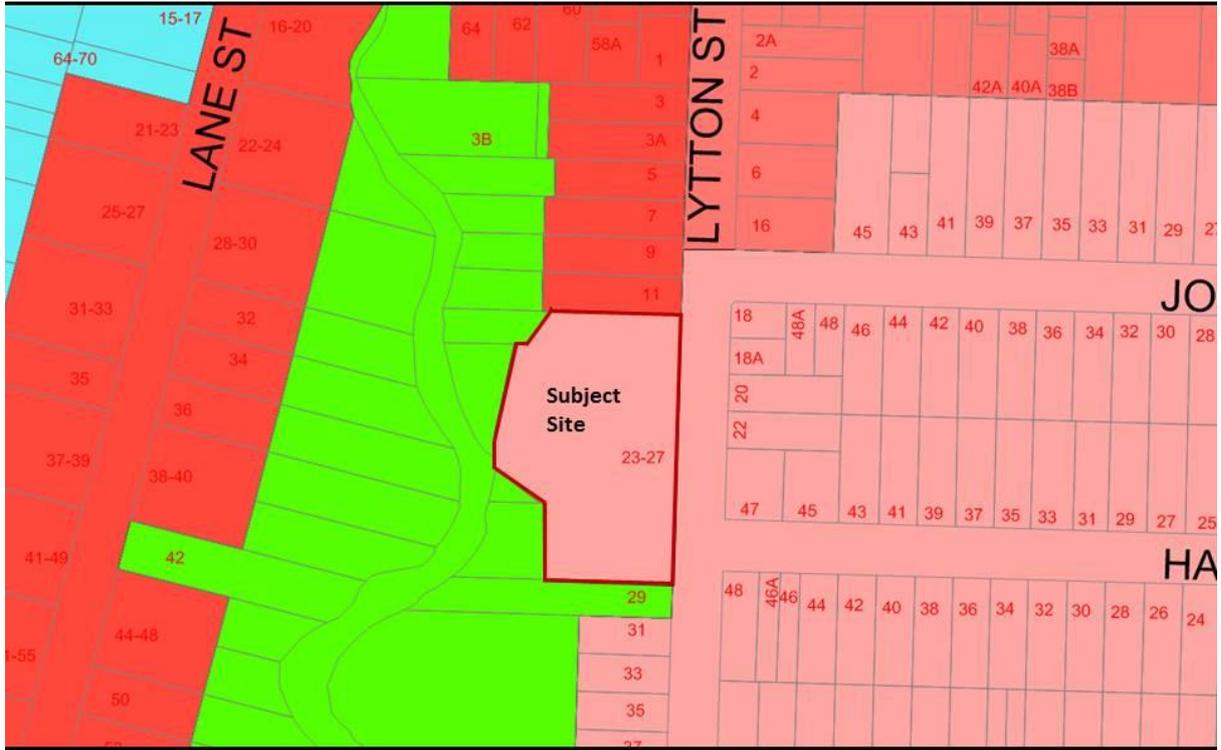
The Westmead Health Precinct is located approximately 3km north-east of the Site. This Precinct has been identified within the metropolitan strategic guidance “A Plan for Growing Sydney”, (December 2014) as a key specialised (medical) precinct for the Sydney Metropolitan Area.

Planning Context

Holroyd Local Environmental Plan 2013

The Site is zoned R2 Low Density Residential (Figure 3). Although “Health Service Facilities” are prohibited within this zone, under the Holroyd LEP 2013, the facility operates under Existing Use Rights.

The Site is affected by a Floor Space Ratio (FSR) of 0.5:1 and a maximum building height of 9m (Figure 4: and Figure 5 respectively).



Land Use Zoning

Figure 3: Zoning map per Holroyd LEP 2013



Height of Buildings

Figure 4: Maximum Height of Buildings per Holroyd LEP 2013



Floor Space Ratio

Figure 5: Floor Space Ratio Plan per Holroyd LEP 2013

This Planning Proposal seeks to amend the Holroyd LEP 2013 to an R4 High Density Residential zoning, to increase the maximum permitted building height to 15m and to increase the FSR to 1:1.

By applying the provisions of the Infrastructure SEPP, which identifies R4 High Density Residential zone as a Prescribed Zone within which a Health Service Facility may be located, the zone amendment would therefore support the existing Clinic on the Site, and enable an expansion of the Clinic with a new building and associated dedicated new treatment services. The maximum building height and floor space ratio amendments are to be compatible with the R4 High Density Residential zoning and to support operational requirements of the expansion.

Pre Lodgement Meetings

A preliminary meeting was held with Councils’ Strategy Planning Officers on 8 December 2014. The Proponents’ Planning Proposal was then lodged. A Councillors Briefing Session was held on 10 February 2015.

Part 1: Objectives and Intended Outcomes

The Objective of the Planning Proposal is amend the Holroyd LEP 2013 for 23-27 Lytton Street, Wentworthville (being Lot 1 DP 787784) as follows: rezone from R2 Low Density Residential to R4 High Density Residential; to increase the Maximum Building Height from 9m to 15m; and to increase the FSR from 0.5:1 to 1:1.

The intended outcome of the rezoning and other building control amendments is to enable the expansion of the Northside West Clinic through the Prescribed Zone of the Infrastructure SEPP which permits Medical Service Facilities within an R4 High Density Residential zone.

The expansion of the Clinic would involve the construction of a new purpose-built facility on the Site that will offer in- and out- patient rehabilitation as a new service.

An indicative Concept Development design for the expansion of the site with the new building and related services has been prepared by Team 2 Architects and is provided in the applicants' Planning Proposal documentation with excerpts provided below. The Concept Development design will be revised and refined as part of any future Development Application process subsequent to approval of this Holroyd LEP amendment application.

Although the intention behind this Planning Proposal is in respect of a medical related facility, the general intent of the R4 High Density Residential (ie to provide high density housing) will also be broadly considered as a possible and permissible land use.

Part 2: Explanation of Provisions

The North Side West Clinic is a Health Services Facility. Health Service Facilities are defined by the Holroyd LEP 2013 and the Infrastructure SEPP as:

“a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following:

- a) a medical centre;*
- b) community health service facilities;*
- c) health consulting rooms;*
- d) patient transport facilities, including helipads and ambulance facilities;*
- e) hospital.”*

While a Health Services Facility is a prohibited land use within an R2 Low Density Residential zone, the Clinic currently operates under Existing Use Rights. However, these Rights preclude a significant expansion of or other change of that prohibited land use.

An amendment to the Holroyd LEP 2013 and the application of the Infrastructure SEPP is sought in order to permit Health Services Facilities on the site, and so the expansion of those services and facilities. The amendment seeks to rezone the site from R2 Low Density Residential to R4 High Density Residential, as this zone is a Prescribed Zone permitting a Health Service Facility under the Infrastructure SEPP Part 3 Division 10.

The proposal also seeks to amend the Holroyd LEP 2013 built form provisions for the FSR and Building Height per Table 1.

Figure 6; Figure 7; and Figure 8 below provide the proposed built form controls, current and proposed, under the Holroyd LEP 2013.

Table 1: Summary of proposed control changes

Control	Current	Proposed
Land Use Zone	R2 Low Density Residential	R4 High Density Residential
Maximum Building Height	9m	15m
Floor Space Ratio (FSR)	0.5:1	1:1

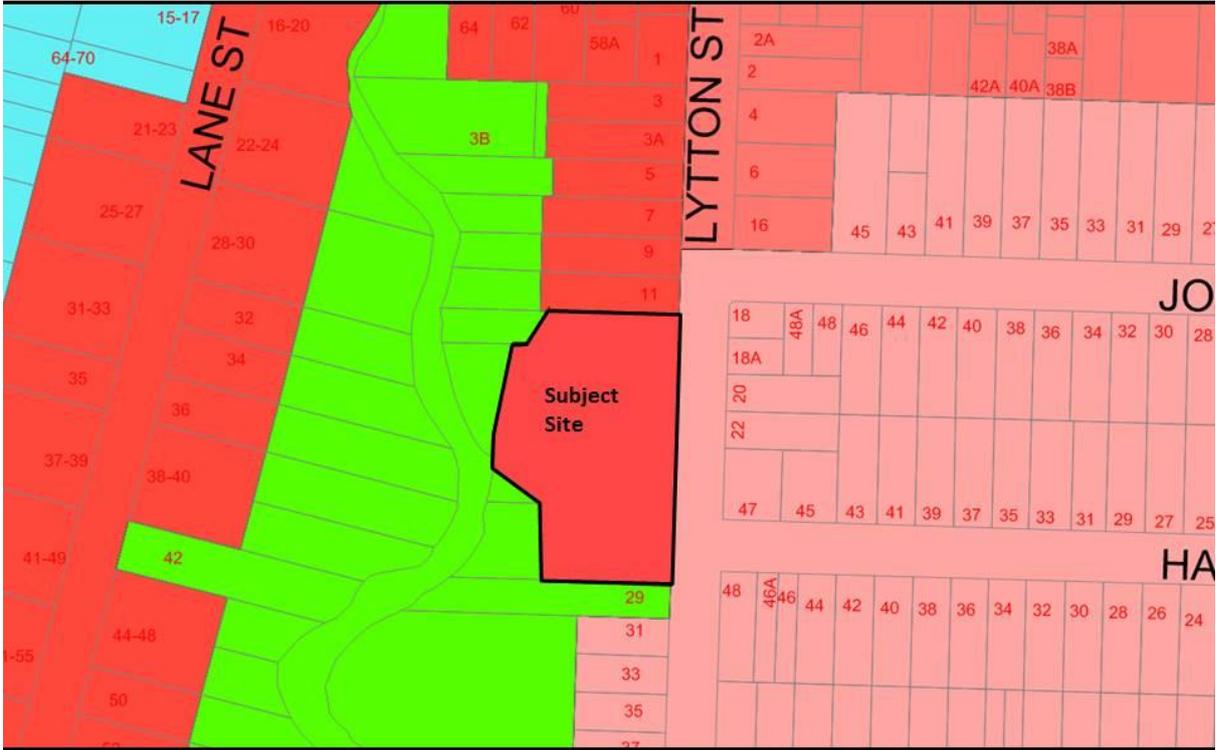


Figure 6: Proposed Land Use Zone (R4 High Density Residential)



Floor Space Ratio

Figure 7: Proposed Floor Space Ratio (at 1:1 consistent with 5-11 Lytton St)



Height of Buildings

Figure 8: Proposed Height of Buildings (at 15m; consistent with 1-3A Lytton St)

Part 3 Justification

The Planning Proposal and Development Concept

Justification of Proposed LEP Amendments

The proposed design and function of the new facility is to provide purpose-built facilities that will provide in- and out-patient rehabilitation services within a private hospital environment. The new Clinic building will be co-located on the Site which supports an existing medical services facility but with a different service offering. The Site is in proximity to the Westmead Medical Precinct and so the new Clinic would potentially support that Precinct, its patients, as well as the wider community.

The Site is currently zoned R2 Low Density Residential. While a Health Services Facility is a prohibited use under the current R2 Low Density Residential zoning, the existing facility is operating under Existing Use Rights. Under those Rights, expansion of or significant change within that prohibited use is not permitted. However, under the Infrastructure SEPP, a Health Service facility is a permissible activity within a Prescribed Zone – where the Prescribed Zone listing includes an R4 High Density Residential zone but does not include R2 Low Density Residential zone. Therefore, with the rezoning of the site to R4 High Density Residential, and applying the provisions of the Infrastructure SEPP, the existing Clinic will be located within an appropriate zone and enable its expansion and so contribute to community medical service requirements.

The application also seeks an amendment to the Holroyd LEP 2013 to permit a Maximum Building Height of 15m and a maximum FSR of 1:1. This increased building height is stated, in the Architectural Statement to the Proponent Planning Proposal, as required to meet the floor to ceiling clearances for Class 9A hospital buildings and recognising the requirement for roof mounted plant. These amendments are to also achieve consistency with the existing and under construction built forms on the site, and to align with the R4 High Density Residential zoning.

Future Intended Development – Intended Outcome of Amendment

This Planning Proposal is to enable the construction and use of a new purpose-built hospital building that will provide patient rehabilitation services. Under the Development Concept the building is envisaged as having three (3) storeys with rooftop plant and equipment and basement car parking. The areas and services of the new building, per the Development Concept, are outlined below.

- The ground level is intended to provide:
 - Waiting and consulting rooms.
 - Administration and office space.
 - Rehabilitation facilities including gymnasium and hydrotherapy pool, and change rooms.
 - Kitchen, servery area and dining room.
 - Courtyard.
 - Service areas.
- The first and second floors are intended to provide a total of about 60 in-patient accommodation rooms (sleeping area and ensuite), as well as common rooms and service areas.
- Basement car parking over three (3) levels to support the new building and to replace parking lost (with construction of the new building) over several levels is proposed.

The facility would provide employment opportunities during its construction and operation.

Figure 9, Figure 10 and Figure 11 provide the Development Concept of the new building location (identified as Stage 2 on Figure 9), and indicative layouts of the ground floor and an in-patient floor respectively as provided in the Proponent Planning Proposal. It is understood this building is intended to function essentially independent of the existing Clinic building.

Potential Future (High Density) Residential Development

Although the Planning Proposal underlying objective is to enable the expansion of the existing medical facility, the rezoning and change in built form controls would create the potential for the future redevelopment of the site for multi storey apartment blocks. Therefore consideration is given for that potential development type on this Site, although this is limited to a general concept of a multi-storey apartment building only, and applying the maximum building height and FSR as sought under this Planning Proposal (ie 15m and 1:1 respectively).

The land to the immediate north of the Site is developed with low density residential, although it is zoned for R4 High Density Residential in the Holroyd LEP 2013. This land also has an FSR of 1:1, which is the same as proposed for the Site, and maximum building height of 12.5m, which is 2.5m lower than proposed for the Site. The Site will therefore form an extension of the R4 zone with the same or similar controls.

The land to the south (beyond the narrow open space corridor) is developed with low density residential housing, is zoned R2 Low Density Residential, an FSR 0.5:1 and Maximum Building Height of 9m. The open space corridor provides visual and physical separation between these residences and the Site.

The land directly opposite on Lytton Road is developed with single and two storey residences, is zoned R2 Low Density Residential, has an FSR 0.5:1 and maximum building height of 9m. Land diagonally opposite (north east of) the Site supports low density residential although is zoned R3 Medium Density Residential; has an FSR of 0.7:1; and maximum building height of 9m. While both these land areas envisage a smaller building mass (in terms of building height and FSR), the western side of Lytton Road (containing the Site) has a lower ground elevation which will mitigate some of a new buildings' perceived height.

Concept and detailed design of any future apartment building on the site, including landscaping and façade, could be used to respond to any FSR and building appearance related matters.

Section A - Need for the Planning Proposal

Q: Is the planning proposal a result of any strategic study or report?

The Proponent Planning Proposal application is not the direct result of a strategic study or report. The proposed amendment to the Holroyd LEP 2013, to enable the expansion and continued use of the site for "Health Service Facility", aligns with a number of state and regional strategic studies and reports (detailed in Section B).

Q: Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes. It is considered that the Planning Proposal is the best means of achieving the objectives and intended outcomes.

The current R2 Low Density Residential zoning prohibits a "Health Services Facility" land use. The Northside West Clinic is permitted to operate under Existing Use Rights although the Clinic is not able to expand or undergo significant change. Therefore an amendment to the Site zoning under the Holroyd LEP 2013 is required to permit the expansion of the Northside West Clinic as well as to strengthen the current Clinics operating status.

The Planning Proposal is to rezone the site from R2 Low Density Residential to R4 High Density Residential. Whilst Health Service Facilities are a prohibited land use within the R4 High Density Zone of the Holroyd LEP 2013; the provisions of Part 3 Division 10 of *State Environmental Planning Policy (Infrastructure) 2007* (Infrastructure SEPP) permit the development of the site for the purposes of Health Service Facilities within the R4 High Density Residential zone.

Amendment to the maximum building height and FSR are also sought. These building control amendments are to support the proposed rehabilitation use of the new Clinic building, to meet required standards for Class 9A hospital buildings, to accommodate required rooftop plant, and to be complementary to the proposed R4 High Density Residential zoning. Amenity impacts of the building mass could be tempered by topography changes, façade appearance and landscaping.

Overall, it is considered that the proposed rezoning will be compatible with the current ongoing use on the Site and will enable additional and in demand health services facilities in the Sydney region. The proposal will also contribute to utilising the established physical and social infrastructure which currently services the site and adjacent urban areas, whilst contributing to additional employment during construction and post construction.

Section B - Relationship to strategic planning framework

Q: Is the planning proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?

Sydney Metropolitan Strategy

The applicable Sydney Metropolitan (Regional) Strategy is “*A Plan for Growing Sydney*” (the Plan) of December 2014. The Plan sets out four goals, with supporting directions, to achieve the vision of “a strong global city, a great place to live”. Directions relevant to this Planning Proposal, and a comment outlining how the proposal responds to that direction, are provided below. The full list of goals and directions, and their relevance, are provided in Appendix B.

Table 2: Relevant Sydney Metropolitan Strategy Goals and Directions

Goal 1: A competitive economy with world-class services and transport			
Direction		Relevant	Comment
1.2	Grow Greater Parramatta – Sydney’s second CBD	Yes	Greater Parramatta includes the Westmead health precinct (with Westmead Private Hospital, Westmead Children’s Hospital and Westmead Hospital) – being the area located north of the railway line. The Concept Development for a private rehabilitation hospital/clinic will support the medical function of the Westmead precinct. Potentially the clinic will receive patients from the Westmead hospitals for post-operative rehabilitation, releasing beds and resources within Westmead for new patients.
1.4	Transform the productivity of Western Sydney through growth and investment	Yes	The Proposal will invest in medical support services in Wentworthville, including creation of some additional jobs and built structures.
1.9	Support priority economic sectors	Yes	Medical services may be considered a professional service – which is a priority industry. The Development Concept of a rehabilitation clinic will provide a new purpose built medical support facility; and provide support to the functioning and patient services of Westmead and other operative hospitals.

Goal 1: A competitive economy with world-class services and transport			
Direction		Relevant	Comment
1.10	Plan for education and health services to meet Sydney's growing needs.	Yes	The development concept is to provide rehabilitation services, for in- and out- patients. Patients are anticipated as predominately elderly. Given aging as a population trend, and quality of life considerations, the need for the services proposed is present and ongoing.
1.11	Deliver infrastructure	Yes	The Proposal is for the delivery of social infrastructure – being a Medical Service facility (rehabilitation hospital).

Goal 4: A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources			
Direction		Relevant	Comment
4.2	Build Sydney's resilience to natural hazards	Yes	The site is affected by the 1 in 100 year flood event. However, this flood risk has been assessed at less than 100mm at the street and therefore falls within the margin that would not be classified as "flood" for planning purposes. The flood risk is associated with overland flow as water flows down over the site to the Finlayson Creek drainage system. Under these conditions reasonable flood free access can be achieved so that emergency vehicles could access the site to evacuate could be undertaken if required. The Development Concept for the proposed building incorporates a floodwater diversion drainage system to intercept and redirect flood waters out of and around the building. The stormwater channel that contains Finlayson Creek has been designed to accommodate flood flows.
4.3	Manage the impacts of development on the environment	Yes	Details of the building design and measures to incorporate ecologically sustainable development principles will be identified at any future Development Application process.

Sub-Regional Strategy

The current sub-regional strategy covering the Wentworthville area is the West Central Sub-Regional Strategy (draft) of 2007 that was prepared under the previous Metropolitan Strategy. No sub-regional strategy associated with "A Plan for Growing Sydney" has yet been prepared. While this Strategy is outdated the general intent of supporting elements including economic growth, housing, social needs and transport remain relevant.

The Development Concept for a medical services facility could support Westmead as a specialised medical service centre, as well as provide social infrastructure to support the growing population. The Clinic will provide an ongoing employment benefit. The Development Concept intensifies development of the site, and expands the existing use.

Q: Is the planning proposal consistent with the Council's local strategic or other local strategic plan?

Council's local strategic plan is the "*Living Holroyd: Community Strategic Plan 2013*", providing the vision for the LGA to 2031. The vision consists of five (5) elements, being a place that is:

- Active: a place that is inclusive, healthy and safe.
- Growing: a place that is focused on effective urban planning and economic development.
- Balanced: a place that values its environment, open space and sustainable development.
- Connected: a place that is open and accessible for all.
- Dynamic: a place that is engaged and innovative.

The Development Concept and associated Proponent Planning Proposal application are consistent with and support many of the elements of the Vision for Holroyd including to:

- Provide medical services to meet the needs of the local, regional and metropolitan community.
- Support the ongoing and expansion of the existing medical facility in an appropriate zone.
- Strengthens and broadens the existing medical facility services offered within the Site.
- Result in substantial investment within the Site, provide additional employment, potentially increase trade with supplier businesses and enhance the relationship with the Westmead health precinct.
- Be located in proximity to active and public transport networks. However the nature of the facility requires vehicular access, potentially limiting the use of alternative transport modes.

Q: Is the planning proposal consistent with applicable State Environmental Planning Policies?

The Infrastructure SEPP is fundamental to this Planning Proposal, as addressed below.

There are no State Environmental Planning Policies (SEPPs) or known draft policies that would prohibit or restrict the Planning Proposal.

A full listing of SEPPs and a comment addressing their application to this Proposal is provided at Appendix B.

State Environmental Planning Policy (Infrastructure) 2007

As previously outlined, this Planning Proposal relies on the provisions of the Infrastructure SEPP which identify an R4 High Density Residential zone as a Prescribed Zone within which Health Services Facility are a permissible activity (refer Part 3; Division 10). Therefore, rezoning of the site to R4 High Density Residential would, under the Infrastructure SEPP, enable the existing medical clinic to be expanded in terms of the building and the services offered, and confirm the Clinic (existing and future elements) through being located within an appropriate land use zone.

Clause 104 of the Infrastructure SEPP identifies that certain traffic generating developments that are to be referred to Roads and Maritime Services (RMS) for assessment. Schedule 3 details the criteria for specified developments that trigger that referral. For a Hospital (development purpose), the criteria for referral are:

- With access to any road: a Hospital having 200 or more beds.
- With access to a classified road or road that connects (within 90m of the Site) to a classified road: a Hospital having 100 or more beds.

Lytton Street is not a classified road nor does it connect, within 90m, of a classified road. Therefore the referral to RMS is not triggered by this criterion.

The Development Concept indicates approximately 60 in-patient beds are to be provided. The existing facility, including Stage 1 extension, will provide 73 beds. The total in-patient beds for the Hospital will therefore be about 133 beds. As this is below the 200 bed hospital with access to any road criteria, the referral to RMS is not triggered. This bed provision can be reconfirmed as part of any future Development Application activity.

Q: Is the planning proposal consistent with applicable Ministerial Directions (s117 directions)?

Relevant Section 117 (s117) Ministerial Directions to the proposed development and comment of consistency are identified below (Table 3). A list of all s117 Directions, their relevance and consistency, are provided in Appendix B.

Table 3: Consistency to Relevant s117 Ministerial Directions

<p><u>3. Housing, Infrastructure and Urban Development:</u></p> <p><u>3.1 Residential Zones</u></p> <p>The Site is currently, and has for over a decade, been used as a Medical Services Facility. Therefore the proposed Holroyd LEP 2013 amendment and related Development Concept will not reduce the housing supply or housing affordability in the area.</p> <p>The Development Concept provides for on-site car parking. There will be an increase in traffic on local roads associated with the development, however this is assessed as having a low impact and can be supported by the existing road networks.</p> <p>The R4 High Density Residential zoning would allow for the Site to be redeveloped for housing in the future if and when the Hospital facility ceases operation.</p> <p>The proposed rezoning is consistent with existing zoning to the immediate north of the Site and in the Wentworthville local centre. There is capacity in the centre to provide for future housing needs.</p> <p>The proposed rezoning would allow the site to revert to residential accommodation in the future. However this is not the immediate or long term intention of the property owner and Clinic operator, Ramsay Health Care.</p>
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4. Hazard and Risk:

4.3 Flood Prone Land

The Site backs onto Lytton Street Park which contains Finlayson Creek. Along this segment, the Creek flows within an open concrete-construction drain. This drain has been designed to accommodate flood flows.

The creek corridor is the low elevation level for the local area, with the Site located on a slope to that drainage corridor.

The site is identified as at risk of flood – being within the 1 in 100 year flood planning level (1% Annual Exceedance Probability (AEP)). However this level of affectation is less than 100mm and therefore not classified as “flood”. The flood risk is associated with overland flow towards the creek rather than a creek overflow.

Due to the low level of affectation, flood free access is still achievable from this site and emergency vehicles could still access the site during a 1% flood event. The severity of flood affectation on this site is not considered to be such that it would prevent this planning proposal from proceeding.

The Development Concept plans outline a floodwater bypass drainage system that is to capture and divert water flow around the building. Although the details of that system (such as capacity) are not known, it would be expected to have an effect in mitigating the risk to the building from high rain/flood events.

The Development Assessment process and associated documentation will further investigate the flood risk at the Site and response.

5. Regional Planning:

5.1 Implementation of Regional Strategies

The Planning Proposal is consistent with “*A Plan for Growing Sydney*” (December 2014) metropolitan strategy and is consistent with the Central West Sub Regional Strategy (draft) of 2007.

7. Metropolitan Planning:

7.1 Implementation of A Plan for Growing Sydney

The Planning Proposal is consistent with and supports goals and directions of the “*Plan for Growing Sydney*” metropolitan strategy.

Section C - Environmental, Social and Economic Impact

Q: Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

No. The Planning Proposal does not affect any critical habitats, populations or ecological communities. The Site is located in a developed urban area where no such populations or communities are known to exist.

The Site is adjacent to the Lytton Street Park and, within that Park corridor, Finlayson Creek. This segment of Finlayson Creek runs within a concrete drainage/stormwater channel and therefore is highly disturbed. The Park corridor contains maintained grass areas and tree vegetation (native and exotic species), and is used for recreational activities. Therefore the natural environmental values of the Park, in terms of protected flora and fauna, are limited although the Park does provide habitat to other species and provides social benefits. No changes or significant impacts are anticipated to the Park from the Proposal.

The building will require the removal of trees within the car park and boundary areas of the Site.

Q: Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

Traffic and Parking

The development will generate additional local traffic (at 95 extra trips per hour during peak per the RMS Guide to Traffic Generating Developments), parking demand, and have related access considerations. These traffic implications are associated with staff working at the Clinic, out-patients attending treatments, in-patients arriving/leaving with own transport, ambulances or similar vehicles transferring patients from hospitals, and visitors. The development is also expected to create increased delivery related traffic (such as food, other stores, linen etc) and waste removal traffic. The site will be accessed via Lytton Street, being the only street frontage and provides the current access to the existing Clinic. Assessment of the traffic and parking aspects notes the following:

- Parking is to be provided in three basement levels of the new building with ramp access from Lytton Street, at the same location as the southern access driveway. A road safety audit may be required if this access is to be located at this same position as this is a prohibited access point.
- The increase in vehicle trips (at 95 vehicles per hour) is higher than that increase as assessed within the Proponents' Planning Proposal. The increase will have an impact on the existing local road environment.
- No ambulance bay or patient drop off point is as part of the building (at ground level) and in proximity to the Reception/Waiting area. This may be shared with the existing building; however this is not clearly defined and would need to be considered in line with the Council Development Control Plan.
- Further assessment is required and to address any issues as part of any progression of design in respect of access point, ambulance bay / private vehicle drop off points, parking provision, vehicle traffic and road network impacts.

Flooding

The site is located within Finlayson Creek Catchment. Finlayson Creek flows within the Lytton Street Park that is adjacent to (the rear boundary) the site. This segment of the creek is channelled through a concrete stormwater drain which has been designed to accommodate flood flows.

The Site is identified as flood affected associated with a 1% AEP flood event. However, the level of inundation on the street is less than 100mm for that event. Due to the low level of flood affect, reasonable flood free access can be achieved at the site during a 1% flood event and emergency vehicles would be able to access the site and undertake evacuations. Probable maximum floods levels, preventing evacuations, are not applicable to the site. Much of the flooding would be due to stormwater (overland) flow rather than rising creek levels and given the sloping topography.

The Development Concept indicative plans outline a floodwater bypass drainage system that is to capture and divert water flow around the building. Although the details of that system (such as capacity) are not known, it would be expected to have an effect in mitigating the risk to the building from high rain/flood events.

Any future Development Assessment process and associated documentation would further investigate the flood risk at the Site and the proposed design response.

Amenity

The Development Concept indicates that the new building will be set back from Lytton Street to align with the current (including Stage 1) clinic building. The Planning Proposal seeks a maximum building height of 15m. The elevation change (down) from Lytton Street will temper the visual appearance of the building. Detailed design of the structure could also be used to manage any visual impact. The vegetation within the narrow corridor to the immediate south of the site will also disrupt the building appearance from that direction. Further visual amenity considerations can be addressed in the detailed design as part of any future Development Application process.

Q: Has the planning proposal adequately addressed any social and economic effects?

Yes.

The Development Concept is not anticipated to create significant negative social effects. Some impacts to nearby property owners, notably visual / amenity based, could be mitigated through building design and landscaping elements as part of any future detailed design and Development Application process. That process may also involve further social impact assessment.

The Development Concept outlines the new facility as to provide rehabilitation services such as required following a surgical procedure. As such the facility would not be used to accommodate drug and alcohol addiction treatment patients. The facility is not identified as to have emergency medical facilities (such as Accident & Emergency) or similar that would have siren noise, general associated disturbance and safety related considerations.

The construction and functioning of the facility will provide short term and ongoing employment opportunities.

The facility would offer a specialised service of modest size that is responding to a perceived current and future need and that will support existing hospitals and other medical centres in the Sydney region.

Section D - State and Commonwealth interests

Q: Is there adequate public infrastructure for the planning proposal?

Yes.

The Development Concept will utilise existing infrastructure services on and near the Site. No upgrades are identified as required. This can be confirmed as part of any future Development Application process.

The Development Concept for the new Clinic building will result in additional public infrastructure, in the form of medical services, which will also supplement and support existing medical services in the Westmead Health Precinct and the wider region.

Traffic impacts to the local road network are assessed as able to be supported with the existing infrastructure.

Q: What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway determination?

No consultation has been carried on the Planning Proposal and it is not envisaged that the proposal will be of concern to State and Commonwealth authorities. However, all relevant authorities identified in the Gateway Determination will be consulted.

Part 4 Mapping

Relevant maps are contained within this document and at Appendix C.

Part 5 Community Consultation

It is proposed to publicly exhibit the planning proposal for a period of twenty eight days or as specified in the Gateway Determination.

Exhibition material will contain a copy of the Planning Proposal and relevant maps supported by a written notice that describes the objectives and intended outcomes of the proposal, the land to which the proposal applies and an indicative time frame for finalisation of the planning proposal. Consultation will not occur until receipt of the 'Gateway Determination'.

The proposed consultation methodology will include, but not limited to:

- Forwarding a copy of the planning proposal and the Gateway Determination to State and Commonwealth public authorities identified in the Gateway Determination;
- Giving notice of the public exhibition in the main local newspaper circulating in the Holroyd LGA;
- Notifying exhibition of the Planning Proposal on Council's web site, libraries and customer service counters including copies of all relevant documentation;
- Notifying all affected property owners and adjoining property owners of matters where there is a proposed change in zoning or density; and
- Circulating copies of the exhibition material within Council.

Part 6 Project Timeline

Table 4 provides an indicative timeline for progression of the Planning Proposal.

Table 4: Indicative Planning Proposal timeline

Milestone	Timeframe
1. Estimated date Council considers the Planning Proposal and formally requests Gateway Determination.	October 2015
2. Estimated date Gateway Determination is issued.	November 2015
3. Estimated commencement date of public exhibition period, nominated as 28 days.	December 2015
4. Estimated timeframe for consideration of submissions.	February 2015
5. Date reported to Council.	February 2016
6. Estimated date LEP amendments are gazetted.	March 2016

Appendix List

- A. Proponent Planning Proposal Request
- B. Consistency with Strategic Plans
- C. LEP Maps with proposed amended controls for the Site
- D. Council Report 07 July 2015

APPENDIX B – Consistency with Strategic Plans

Consistency with “A Plan for Growing Sydney” Goals and Directions

Goal 1: A competitive economy with world-class services and transport			
Direction		Relevant	Comment
1.1	Grow a more internationally competitive Sydney CBD	No	The site is not within the Sydney CBD
1.2	Grow Greater Parramatta – Sydney’s second CBD	Yes	<p>Greater Parramatta includes the Westmead health precinct (with Westmead Private Hospital, Westmead Children’s Hospital and Westmead Hospital) – being the area located north of the railway line.</p> <p>The Development Concept for a private rehabilitation hospital/clinic will support the medical function of the Westmead precinct. Potentially the clinic will receive patients from the Westmead hospitals for post-operative rehabilitation, releasing beds and resources within Westmead for new patients.</p>
1.3	Establish a new Priority Growth Area – Greater Parramatta to the Olympic Peninsula	No	The Site is not within this Priority Growth Area.
1.4	Transform the productivity of Western Sydney through growth and investment	Yes	The Proposal will invest in medical support services in Wentworthville, including providing some additional jobs and built structures.
1.5	Enhance capacity at Sydney’s gateways and freight networks	No	The Site is not within the key gateways or freight networks of Sydney.
1.6	Expand the Global Economic Corridor	No	The site is not within the Global Economic Corridor
1.7	Grow strategic centres – providing more jobs closer to home	No	Neither Wentworthville nor Westmead are identified as a strategic centre.
1.8	Enhance linkages to regional NSW	No	Not applicable. The Development Concept does not include a transport connection component.
1.9	Support priority economic sectors	Yes	<p>Medical services may be considered a professional service – which is a priority industry.</p> <p>The Development Concept of a rehabilitation clinic will provide a new purpose built medical support facility; and provide support to the functioning and patient services of Westmead and other operative hospitals.</p>
1.10	Plan for education and health services to meet Sydney’s growing needs.	Yes	<p>The Development Concept is to provide rehabilitation services, for in- and out- patients. Patients are anticipated as predominately elderly.</p> <p>Given aging as a population trend, and quality of life considerations, the need for the services proposed is present and ongoing.</p>
1.11	Deliver infrastructure	Yes	The Proposal is for the delivery of social infrastructure – being a Medical Service facility (rehabilitation hospital).

Goal 2: A city of housing choice, with homes that meet our needs and lifestyles			
Direction		Relevant	Comment
2.1	Accelerate housing supply across Sydney	No	The Development Concept does not include a housing component. The proposed rezoning of the site from R2 Low Density Residential to R4 High Density Residential raises the potential for future housing on the Site – however given the current use of the site, the Development Concept intent for a new medical service facility, redevelopment of the site for housing would not occur in the short to medium term and is not intended by the property owner.
2.2	Accelerate urban renewal across Sydney – providing homes closer to jobs		
2.3	Improve housing choice to suit different needs and lifestyles		
2.4	Deliver timely and well planned greenfield precincts and housing		

Goal 3: A great place to live with communities that are strong, healthy and well connected			
Direction		Relevant	Comment
3.1	Revitalise existing suburbs	No	The Development Concept does not include housing or public space. No changes are proposed to the adjacent open space (Park).
3.2	Create a network of interlinked, multipurpose open and green spaces across Sydney	No	The intended use does not include public space. No changes are proposed to the adjacent open space (Park).
3.3	Create healthy built environments	No	The Proposal is for a destination-type development and private use.
3.4	Promote Sydney's heritage, arts and culture	No	The proposal does not include a heritage, arts or culture component.

Goal 4: A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources			
Direction		Relevant	Comment
4.1	Protect our natural environment and biodiversity	No	The site is not located within or in proximity to significant natural environmental values. No changes are proposed to the adjacent open space (Park and Finlayson Creek corridor).
4.2	Build Sydney's resilience to natural hazards	Yes	The site is affected by the 1 in 100 year flood event. However, this flood risk has been assessed at less than 100mm at the street and therefore falls within the margin that would not be classified as "flood" for planning purposes. The flood risk is associated with overland flow as water flows down over the site to the Finlayson Creek drainage system. Under these conditions reasonable flood free access can be achieved so that emergency vehicles could access the site to evacuate could be undertaken if required.

			<p>The Development Concept for the proposed building incorporates a floodwater diversion drainage system to intercept and redirect flood waters out of and around the building.</p> <p>The stormwater channel that contains Finlayson Creek has been designed to accommodate flood flows.</p>
4.3	Manage the impacts of development on the environment	Yes	Details of the building design and measures to incorporate ecologically sustainable development principles will be identified at any future Development Application process.

Consistency with applicable State Environmental Planning Policies

Relevant State Environmental Planning Policies	Consistent	Comment
State Environmental Planning Policy No 1 – Development Standards	N/A	N/A
State Environmental Planning Policy No 14 - Coastal Wetlands	N/A	N/A
State Environmental Planning Policy No 15 -Rural Land sharing Communities	N/A	N/A
State Environmental Planning Policy No 19 -Bushland in Urban Areas	N/A	N/A
State Environmental Planning Policy No 21- Caravan Parks	N/A	N/A
State Environmental Planning Policy No 26 -Littoral Rainforests	N/A	N/A
State Environmental Planning Policy No 29 -Western Sydney Recreation Area	N/A	N/A
State Environmental Planning Policy No 30 -Intensive Agriculture	N/A	N/A
State Environmental Planning Policy No 32 -Urban Consolidation (Redevelopment of Urban Land)	N/A	N/A
State Environmental Planning Policy No 33 -Hazardous and Offensive Development	N/A	N/A
State Environmental Planning Policy No 36 -Manufactured Home Estates	N/A	N/A
State Environmental Planning Policy No 39 - Spit Island Bird Habitat	N/A	N/A
State Environmental Planning Policy No 44 -Koala Habitat Protection	N/A	N/A
State Environmental Planning Policy No 47 -Moore Park Showground	N/A	N/A
State Environmental Planning Policy No 50 -Canal Estate Development	N/A	N/A

State Environmental Planning Policy No 52 -Farm Dams and Other Works in Land and Water Management Plan Areas	N/A	N/A
State Environmental Planning Policy No 55 -Remediation of Land	YES	The potential for site contamination is considered low and unlikely given current and historical use of the site for the purposes of a 'health care facility'. It is considered that this site is suitable for continued use as a 'health service facility'.
State Environmental Planning Policy No 59 -Central Western Sydney Regional Open Space and Residential	N/A	N/A
State Environmental Planning Policy No 62 -Sustainable Aquaculture	N/A	N/A
State Environmental Planning Policy No 64 -Advertising and Signage	N/A	N/A
State Environmental Planning Policy No 65 -Design Quality of Residential Flat Development	N/A	N/A
State Environmental Planning Policy No 70 -Affordable Housing (Revised Schemes)	N/A	N/A
State Environmental Planning Policy No 71 -Coastal Protection	N/A	N/A
State Environmental Planning Policy (Affordable Rental Housing) 2009	N/A	N/A
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	N/A	N/A
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	N/A	N/A
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	N/A	N/A
State Environmental Planning Policy (Infrastructure) 2007	YES	<p>The planning proposal has considered the relevant part of the SEPP (Infrastructure) 2007, namely traffic developments and is considered consistent. The project envisages the continued development of the site as a hospital. Clause 104 of that SEPP requires that development of a hospital meeting specified criteria requires referral to the Roads and Maritime Services. The proposed development will not meet those criteria and so referral is not triggered.</p> <p>While 'health service facilities' are a prohibited land use within the R4 High Density Residential zone of Holroyd LEP 2013, the provisions of Part 3 Division 10 of SEPP</p>

		(Infrastructure) 2007 permit the development of the site for the purposes of a 'health service facility' within the R4 High Density Residential zone.
State Environmental Planning Policy (Kosciuszko National Park—Alpine Resorts) 2007	N/A	N/A
State Environmental Planning Policy (Kurnell Peninsula) 1989	N/A	N/A
State Environmental Planning Policy (Major Development) 2005	N/A	N/A
State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007	N/A	N/A
State Environmental Planning Policy (Penrith Lakes Scheme) 1989	N/A	N/A
State Environmental Planning Policy (Rural Lands) 2008	N/A	N/A
State Environmental Planning Policy (SEPP 53 Transitional Provisions) 2011	N/A	N/A
State Environmental Planning Policy (State and Regional Development) 2011	N/A	N/A
State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011	N/A	N/A
State Environmental Planning Policy (Sydney Region Growth Centres) 2006	N/A	N/A
State Environmental Planning Policy (Temporary Structures) 2007	N/A	N/A
State Environmental Planning Policy (Urban Renewal) 2010	N/A	N/A
State Environmental Planning Policy (Western Sydney Employment Area) 2009	N/A	N/A
State Environmental Planning Policy (Western Sydney Parklands) 2009	N/A	N/A
Deemed State Environmental Planning Policy –Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	YES	There are no provisions within this planning proposal that would affect the application of this SEPP.
Deemed State Environmental Planning Policy – Greater Metropolitan Regional Environmental Plan No.2 –Georges River Catchment	N/A	N/A

Consistency with applicable Ministerial Directions (s117 directions)?

Section 117 Direction	Consistent	Comment
1. Employment and resources		
1.1 Business and Industrial Zones	N/A	N/A
1.2 Rural Zones	N/A	N/A
1.3 Mining, Petroleum Production and Extractive Industries	N/A	N/A
1.4 Oyster Aquaculture	N/A	N/A
1.5 Rural Lands	N/A	N/A
2. Environment and Heritage		
2.1 Environment Protection Zones	N/A	N/A
2.2 Coastal Protection	N/A	N/A
2.3 Heritage Conservation	N/A	N/A
2.4 Recreation Vehicle Areas	N/A	N/A
3. Housing, Infrastructure and Urban Development		
3.1 Residential Zones	Yes	<p>The proposed amendment to the Holroyd LEP 2013 to permit the use of the site for a 'health services facility' will not result in the loss of any residential dwellings. The proposal will have no impact on housing supply or housing affordability.</p> <p>The proposed rezoning will still allow the site to revert to residential accommodation in the future if required, however this is not the immediate or long term intention of the property owner and operator, Ramsay Health Care.</p> <p>The planning proposal intends to result in the provision of an additional 60 beds for rehabilitation purposes, which are a 'low traffic impact' land use category, however will generate additional traffic and as such has the potential to result in impacts on the surrounding road network.</p> <p>The estimated traffic generation increase associated with the development concept</p>

		<p>adopted for this planning proposal will be 38 vehicles per hour during the critical morning peak period. These trips are split into both directions on Lytton Street and can be readily accommodated, with minimal impacts on the surrounding road system, even when account is taken of the approved Stage 1 development, which will result in the generation of 19 vehicles per hour.</p> <p>Any future Development Application will need to be accompanied by an assessment of traffic impacts to determine the net traffic effects of the development and consequential actions required to manage the traffic impact.</p>
3.2 Caravan Parks and Manufactured Home Estates	N/A	N/A
3.3 Home Occupations	N/A	N/A
3.4 Integrating Land Use and Transport	N/A	N/A
3.5 Development Near Licensed Aerodromes	N/A	N/A
3.6 Shooting Ranges	N/A	N/A
4. Hazard and Risk		
4.1 Acid Sulphate Soils	N/A	N/A
4.2 Mine Subsidence and Unstable Land	N/A	N/A
4.3 Flood Prone Land	Yes	<p>The Site backs onto Lytton Street Park which contains Finlayson Creek. Along this segment, the Creek flows within an open concrete-construction drain. This drain has been designed to accommodate flood flows.</p> <p>The creek corridor is the low elevation level in the local area, with the Site located on a slope to that drainage corridor.</p> <p>The site is identified as at risk of flood – being within the 1 in 100 year flood planning level (1% Annual Exceedance Probability (AEP)). However this level of affectation is less than 100mm and therefore not classified as “flood”. The flood risk is associated with overland flow towards the creek rather than a creek overflow.</p>

		<p>Due to the low level of affectation, flood free access is still achievable from this site and emergency vehicles could still access the site during a 1% flood event. The severity of flood affectation on this site is not considered to be such that it would prevent this planning proposal from proceeding.</p> <p>The Development Concept plans outline a floodwater bypass drainage system that is to capture and divert water flow around the building. Although the details of that system (such as capacity) are not known, it would be expected to have an effect in mitigating the risk to the building from high rain/flood events.</p> <p>The Development Assessment process and associated documentation will further investigate the flood risk at the Site and response.</p>
4.4 Planning for Bushfire Protection	N/A	N/A
5. Regional Planning		
5.1 Implementation of Regional Strategies	Yes	The Planning Proposal is consistent with “A Plan for Growing Sydney” (December 2014) Metropolitan Strategy and is consistent with the Central West Sub Regional Strategy (draft) 2007.
5.2 Sydney Drinking Water Catchments	N/A	N/A
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	N/A	N/A
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	N/A	N/A
5.8 Second Sydney Airport: Badgerys Creek	N/A	N/A
6. Local Plan Making		
6.1 Approval and Referral Requirements	N/A	N/A
6.2 Reserving Land for Public Purposes	N/A	N/A
6.3 Site Specific Provisions	Yes	The Planning Proposal does not propose any

		additional site specific provisions.
7. Metropolitan Planning		
7.1 Implementation of the Metropolitan Plan for Sydney 2036	Yes	The Planning Proposal is consistent with the aims, objectives and strategies of the Metropolitan Plan.

APPENDIX C – LEP Maps with proposed amended controls for the Site

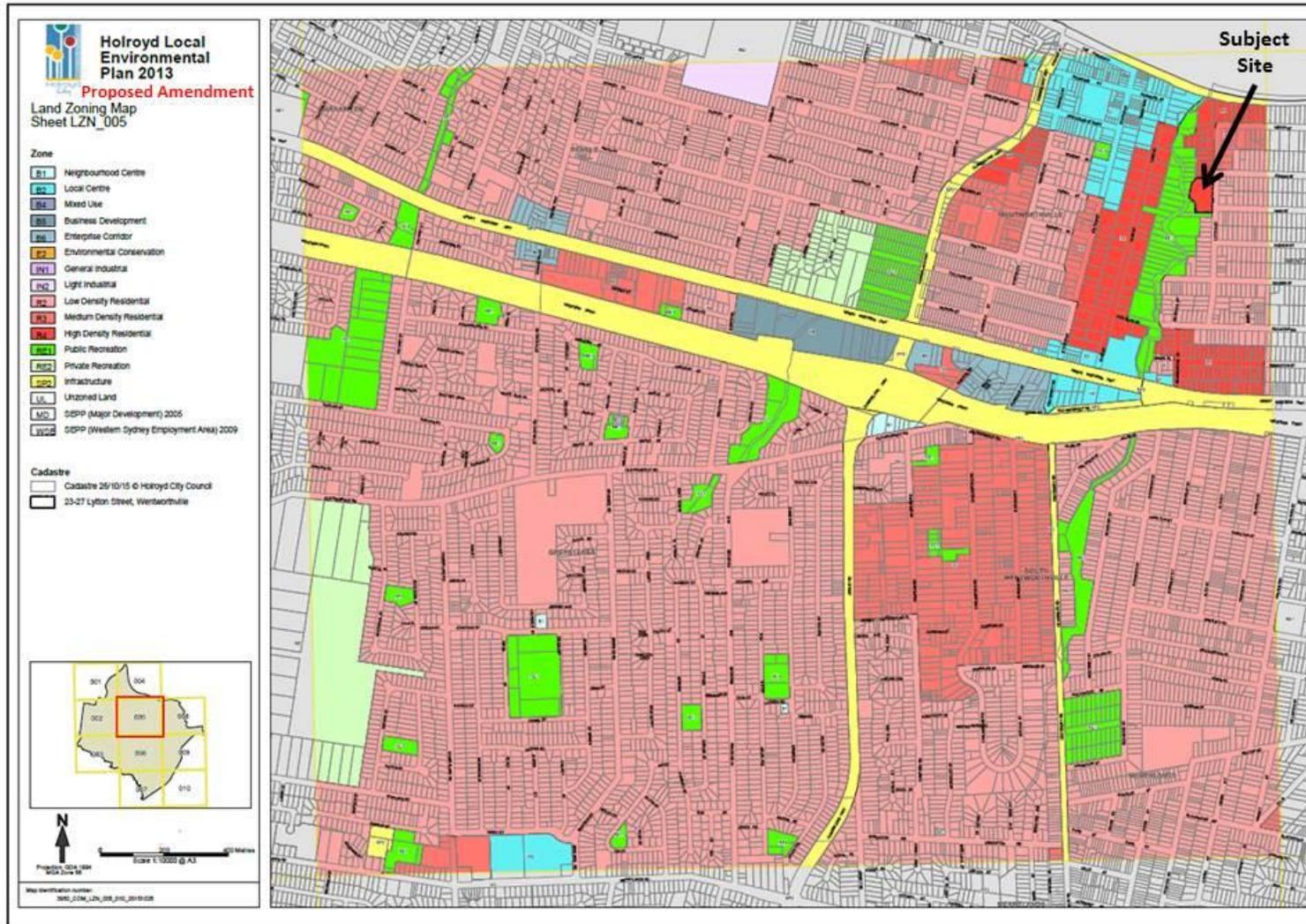


Figure 12: LEP Map - Proposed Amendment - Reference map

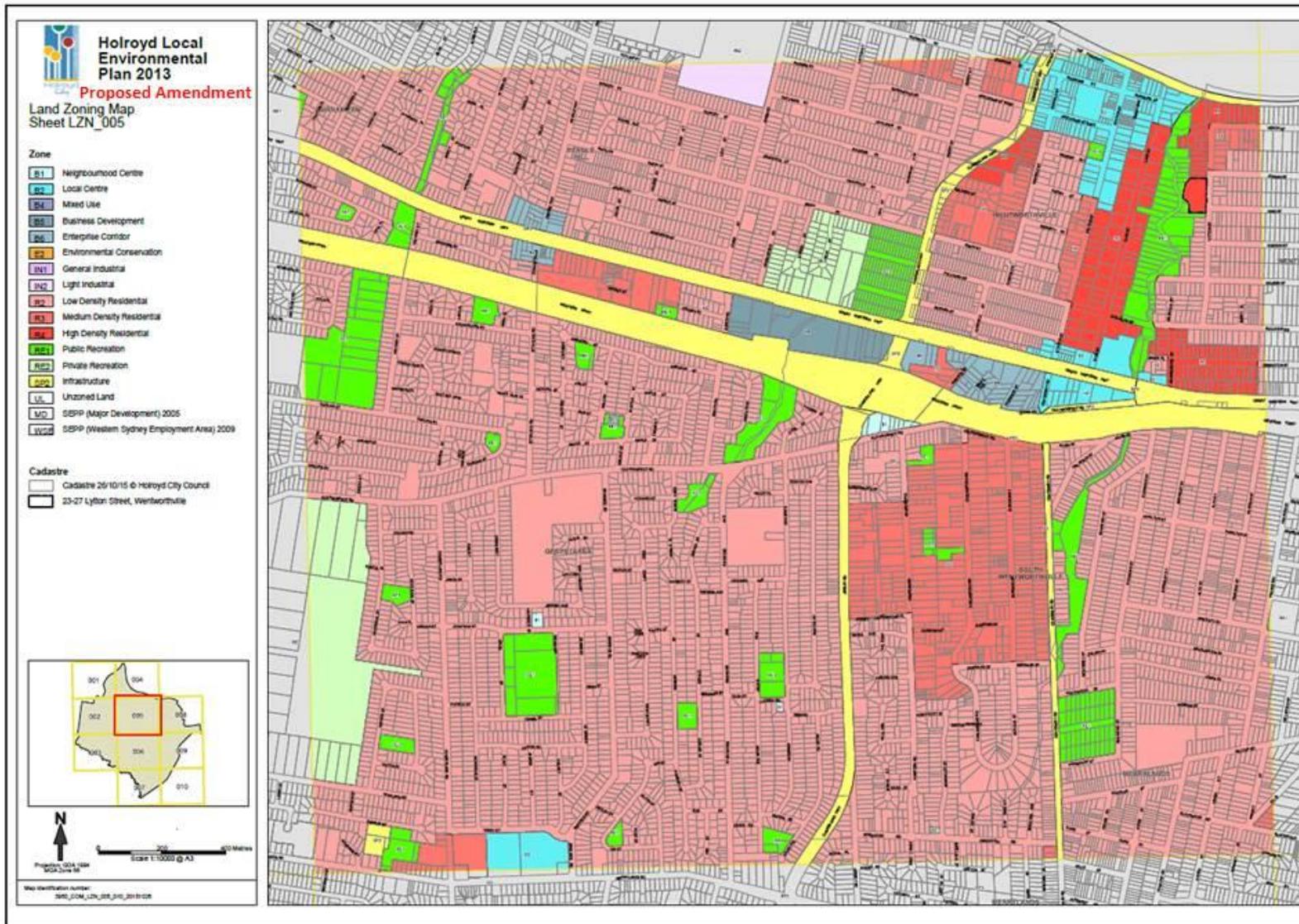


Figure 13: LEP map - Proposed Amendment - Land Zoning Map

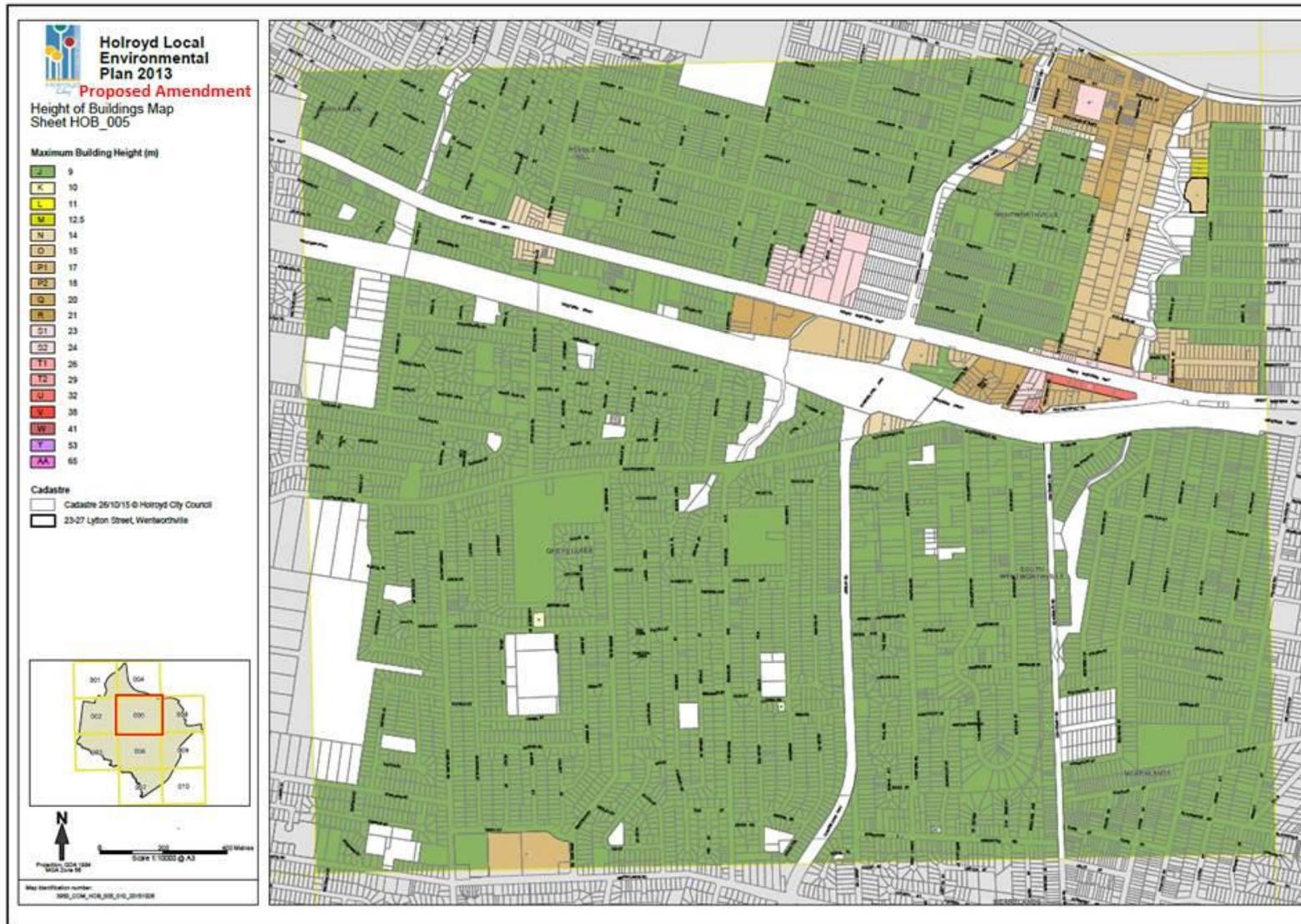


Figure 14: LEP map - Proposed Amendment – Maximum Height of Building Map

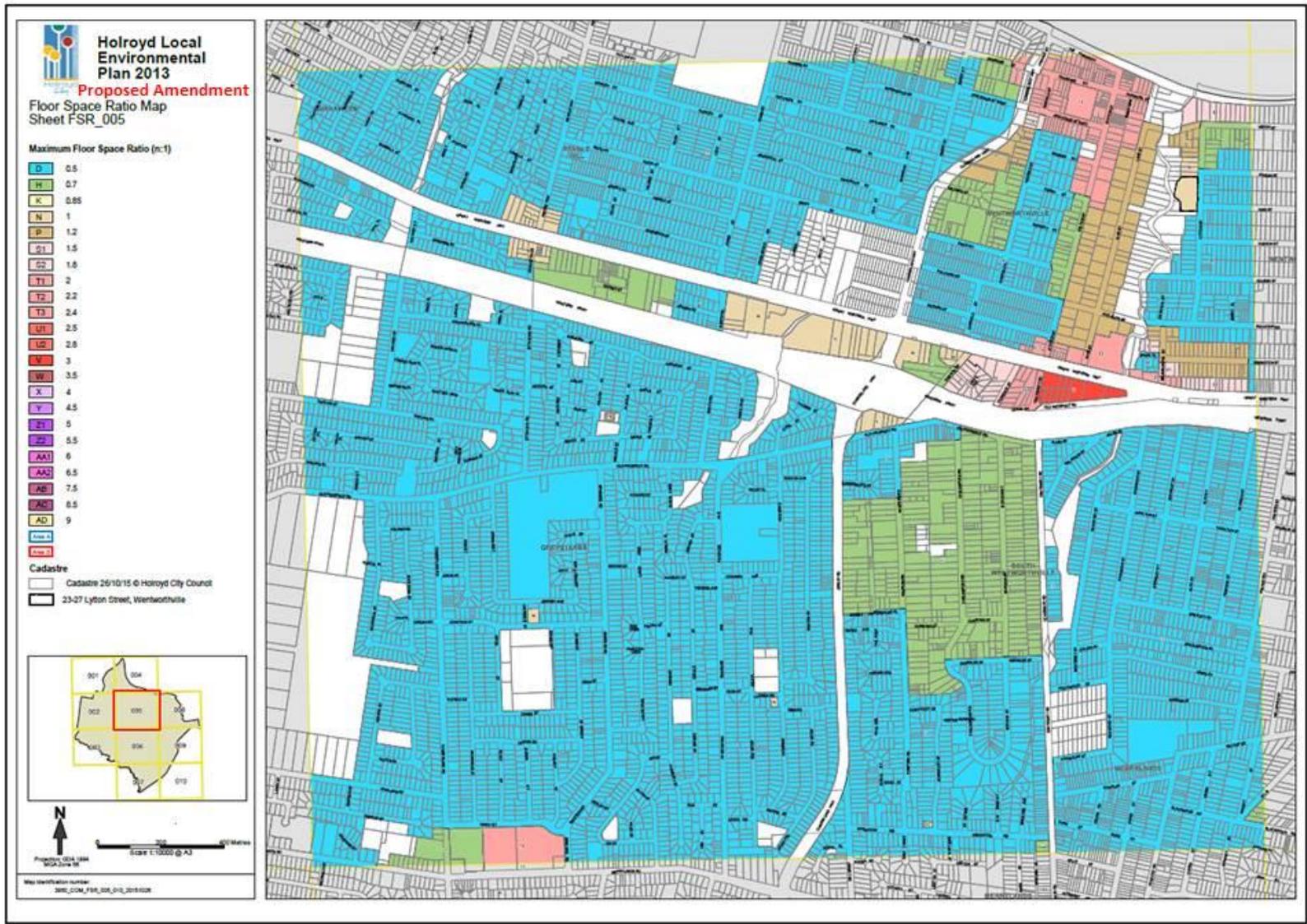


Figure 15: LEP map - Proposed Amendment – Floor Space Ratio Map

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