

# **PLANNING PROPOSAL**

To Amend the Bankstown Local Environmental  
Plan (LEP) 2015 as it Applies to

**Nos. 297-299 Canterbury Road,  
Revesby**

Prepared for:  
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## ANNEXURES

- A. List of State Environmental Planning Policies
- B. Consideration of Section 117 Directions
- C. Plans, Sub-Consultant Reports and Documents

## LIST OF ACRONYMS

AHD	Australian Height Datum
ANEF	Australian Noise Exposure Forecast
CBD	Central Business District
CIV	Capital Investment Value
DA	Development Application
DP	Deposited Plan
DP&E	NSW Department of Planning and Environment
EIS	Environmental Impact Statement
EP&A Act 1979	Environmental Planning and Assessment Act 1979
FSR	Floor Space Ratio
LEP	Local Environmental Plan
LGA	Local Government Area
NSW	New South Wales
OLS	Obstacle Limitation Surface
SA	Statistical Area
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development

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## 1.0 INTRODUCTION

This Planning Proposal has been prepared for Canterbury-Bankstown Private Hospital Pty Ltd by Gary Shiels & Associates Pty Ltd – (hereafter referred to as GSA Planning). GSA Planning has expertise in Urban Design, Environmental & Traffic Planning. This Planning Proposal is for the property known as Nos. 297-299 Canterbury Road, Revesby (hereafter referred to as the “subject site”).

On behalf of the owners of the abovementioned site, we hereby request Canterbury Bankstown Council amend the Bankstown Local Environmental Plan (LEP) 2015 to permit a maximum Floor Space Ratio (FSR) of 2.9:1 on the subject site. The Planning Proposal will facilitate the development of a new six storey private hospital, carparking and associated facilities on the site.

The proposed hospital is considered State Significant Development (SSD) under the provisions of the SEPP (State and Regional Development) 2011 as the development will have a Capital Investment Value (CIV) of over \$30 million. A SEARs for the proposed development was issued on 17 November 2017 (Ref: SSD8834).

The proposal has been the subject of consultation with Canterbury-Bankstown Council and the DP&E, who have been generally supportive of the concept of a private hospital on the site. As the proposal involved a substantial increase in FSR, Council and the DP&E advised that a Planning Proposal be prepared prior to the preparation of an Environmental Impact Statement for a State Significant Development Application.

This Planning Proposal has been prepared in accordance with the Department of Planning and Environment's (DP&E) *A Guide to Preparing Planning Proposals*. It is consistent with the various strategic plans and policies that apply to the site. In particular, the proposed private hospital is consistent with the objectives and goals of *A Plan for Growing Sydney*, which the current metropolitan plan prepared by the DP&E.

The intention of the current 1:1 FSR is based on the industrial uses such as factories and warehouses typically being single storey, and in some cases two storeys to accommodate ancillary office space. Accordingly, a 1:1 FSR is all that is required for these types of uses. However, a hospital use, which is also permissible in the IN1 zone, would require a greater FSR, as hospitals are typically multi storey and have greater spatial requirements to support this use. It is also noted that the proposal will not change the zoning of the site.

There are compelling planning reasons to support the increase in FSR for the subject site. These include the following:

- The proposal will contribute to meeting the growing demands for health infrastructure and support services in metropolitan Sydney;
- The site is ideally co-located in proximity to the existing Bankstown-Lidcombe Hospital, which will assist in servicing the public within the Local Government Area (LGA);
- The proposal will provide substantial increase in employment opportunities;
- A significantly improved built form compared to the existing development on site.

Architectural drawings and a number of supporting consultant reports have been prepared and accompany this Planning Proposal. These documents, including a Phase 1 Site Investigation Report, Flooding Report and Traffic and Parking Report demonstrate that the proposal is suitable for the site and is not likely to have an adverse impact on the amenity of surrounding properties.

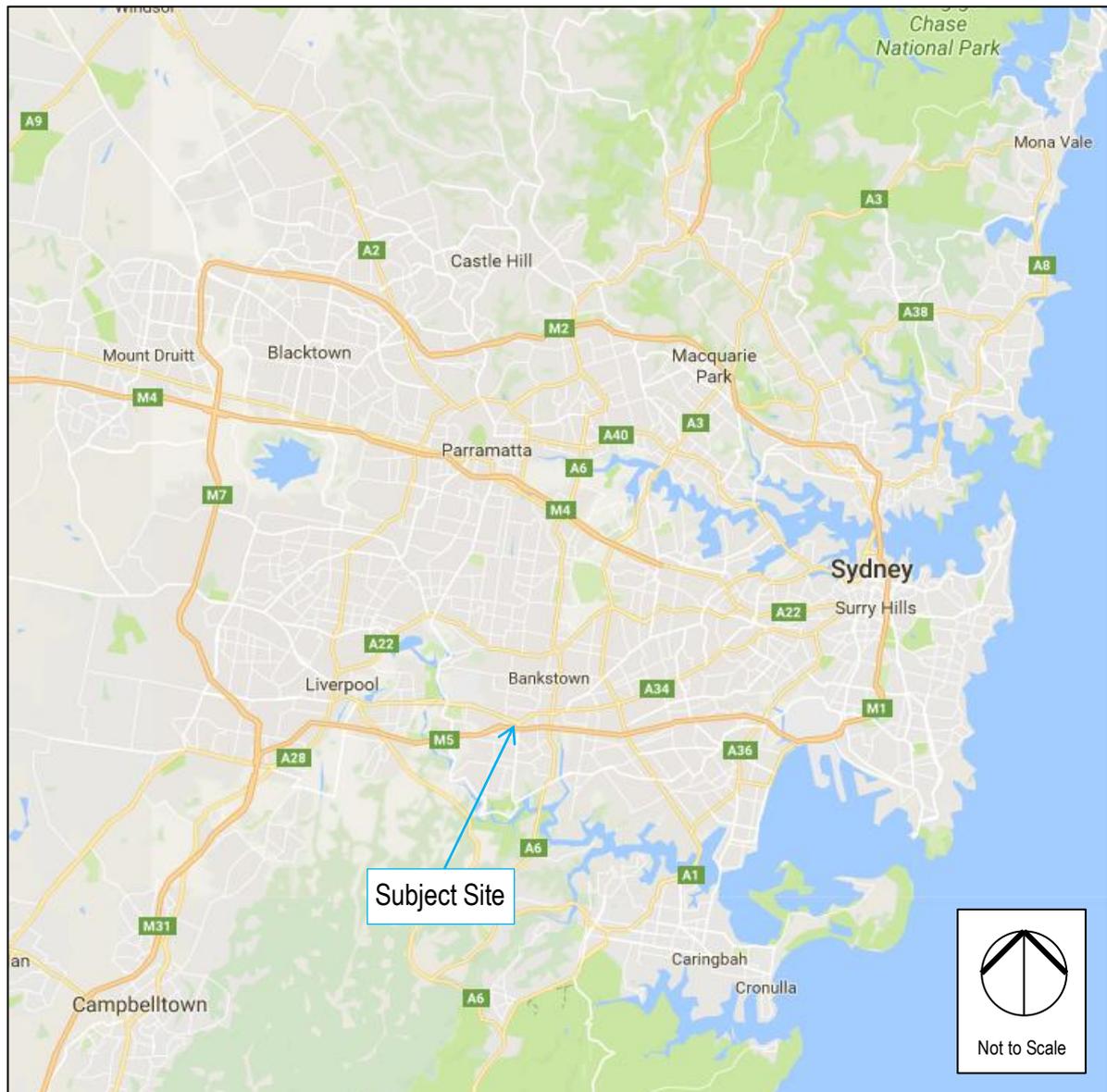
This document is divided into eight sections. Section 2 contains a site analysis; Section 3 provides pre-lodgement background; Section 4 outlines the statutory planning context; Section 5 details the planning proposal; Section 6 provides additional information; and Section 7 concludes the report.

## 2.0 SITE ANALYSIS

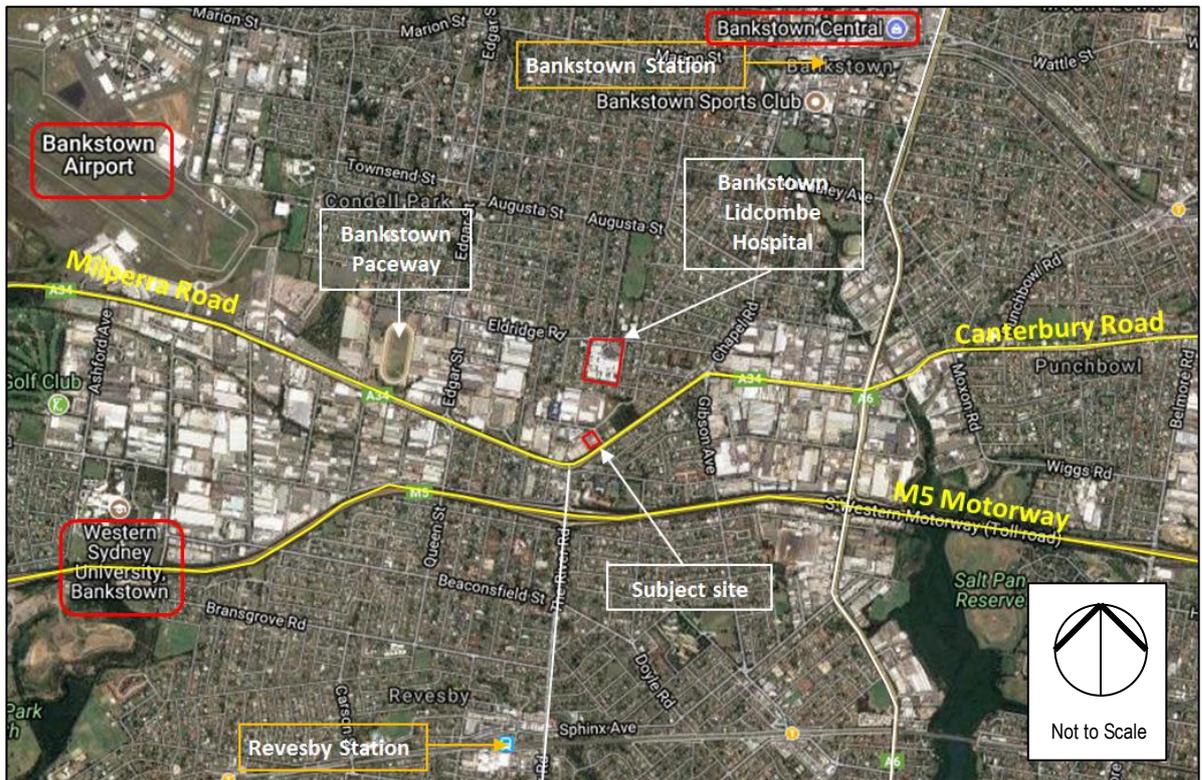
This section contains a description of the following: The Regional and Local Context; Site Description; Existing Built Form and Landscaping and Existing Character and Context.

### 2.1 The Regional and Local Context

The subject site is located approximately 19km south-west of the Sydney CBD, 2.5km from the Bankstown CBD and is located within the LGA of Canterbury-Bankstown (see Figure 1 below and Figures 2 and 3 on the following page).



**Figure 1: Regional Context**  
Source: Google Maps, 2017



**Figure 2: Local Context**  
Source: Google Maps, 2017



**Figure 3: Location Plan**  
Source: Six Maps, 2017

## 2.2 Site Description

The subject site is located on the corner of Canterbury Road and Mavis Street and is known as Nos. 297-299 Canterbury Road, Revesby, described as Lot 9 in DP663160 and Lot 202 in DP849245 (see Figure 3 on the following page).

The site is an irregularly shaped parcel of land, with a north-western boundary of 54.01 metres, a combined north-eastern frontage to Mavis Street of 128.54 metres, a south-eastern frontage to Canterbury Road of 72.44 metres, and a south-western boundary of 122.46 metres, providing a total site area of 9,175m<sup>2</sup> (see Figure 4 Survey Plan separately submitted).

The site has a gentle fall of 2.6 metres (AHD 28.91 – AHD 26.31) from north to south along the western boundary. Additionally, a steep embankment is present on the northern end of the site, rising approximately two metres from the floor level of the northernmost building to the boundary. Despite some variation, site levels are generally consistent from east to west across the site.



**Figure 4: Survey Plan**

Source: LTS Lockley, 2017

- 299 Canterbury Road
- 297 Canterbury Road

## 2.3 Existing Built Form and Landscaping

The site is occupied by a number of industrial buildings including warehouses, offices and showrooms (see Photographs 1-3 below and on the following page). No. 297 Canterbury Road is occupied by a single storey rendered brick office and showroom building that currently addresses Mavis Street and is set back approximately 15m from the Canterbury Road frontage. To the north is an adjoining brick warehouse and a metal clad warehouse. A small metal shed occupies the north-western corner of a concrete and gravel area.

No. 299 Canterbury Road is occupied by a two-storey brick office and showroom building which is set back from Canterbury Road. A metal clad building fronting Mavis Street is also located on the site and is separated from the warehouse by an existing driveway. A concrete and paved area are set behind an existing embankment, retaining wall and small sub-station.

The site comprises limited landscaping, with approximately four trees in the north-western corner of the site adjoining Mavis Street and approximately ten trees at the southern end of the site adjoining Canterbury Road.

Pedestrian access is currently available from both Canterbury Road and Mavis Street. A number of vehicular access points are available to the subject site, including a left in, left out access from Canterbury Road to a bitumen carpark and multiple entry points from Mavis Street.



**Photograph 1:** The subject site, as viewed from Canterbury Road



**Photograph 2:** The subject site, as viewed from Mavis Street



**Photograph 3:** The subject site, as viewed from Mavis Street

## 2.4 The Surrounds

Development surrounding the subject site largely comprises industrial, warehouse style buildings on the northern side of Canterbury Road and low density residential development on the southern side of Canterbury Road. Further to the north, on Eldridge Road, is Bankstown-Lidcombe Public Hospital (see Figure 5).



**Figure 5:** Aerial Perspective  
Source: Apple Maps, 2017

 Subject Site

### Development to the North

To the north of the subject site, on the opposite side of the road, is No. 2 Mavis Street, which comprises warehouse style buildings, a hardstand area and an unbuilt upon area with some vegetation coverage (see Photograph 4). The site is currently occupied by a formwork and scaffolding business. Further to the north is residential development and the Bankstown-Lidcombe Public Hospital.



**Photograph 4:** Development to the north at No. 2 Mavis Street, as viewed from the street

### Development to the East

To the east on the opposite side of Mavis Street is No. 295 Canterbury Road, which comprises a service station (see Photograph 5). Further to the north is No. 293 Canterbury Road which comprises a warehouse style building and is currently occupied by a plumbing supplier.



**Photograph 5:** Development to the east at No. 295 Canterbury Road, as viewed from Mavis Street

### Development to the South

Development to the south on the opposite side of Canterbury Road comprises low density residential development, generally in the form of detached single and two storey dwelling houses (see Photograph 6). Further to the south is more residential development and the M5 Motorway.



**Photograph 6:** Residential development to the south on the opposite side of Canterbury Road

### Development to the West

To the west and adjoining the subject site is No. 299A Canterbury Road and comprises a number of warehouse style buildings and hardstand area (see Photograph 7). Also to the west and adjoining the subject site is No. 9 Mavis Street which comprises a number of warehouse/showroom units as well as a café fronting Mavis Street (see Photograph 8 on the following page).



**Photograph 7:** Development to the west at No. 299A Canterbury Road, as viewed from the street



**Photograph 8:** Development to the west at No. 9 Mavis Street, as viewed from the street

## 3.0 PRE-LODGEMENT BACKGROUND

### 3.1 Background

On **10 October 2017**, a Pre-DA meeting was held with Canterbury Bankstown Council to discuss a proposed new six storey private hospital with ancillary uses, car parking and a child-care centre on the subject site. Council provided written advice following the pre-DA meeting which included the following comments, with our response noted below:

- Child care centres are prohibited in IN1 zones, and the proposal also seeks a FSR of 2.7:1, where 1:1 is the maximum permitted under the LEP. These issues would likely only be addressed through a Planning Proposal via the DP&E, which should be pursued prior to lodging any DA.  
**Response:** The child care centre use has been removed from this application.
- Building design is of high quality, with particular emphasis on the corner elements of the buildings.  
**Response:** The proposed building design is of high quality with feature façade elements and corner elements to create visual interest.
- Any application would require concurrence from Roads and Maritime Services, as Canterbury Road is a State Road.  
**Response:** Noted. The Traffic Report which accompanies this submission also includes initial consultation with the RMS and will also form part of a future EIS to the DP&E.
- Site is affected by an Obstacle Limitation Surface (OLS) associated with Bankstown Airport and would need concurrence from Bankstown Airport Limited.  
**Response:** Noted. Initial consultation was undertaken with Bankstown Airport, who advised that an assessment will need to be undertaken as part of a DA. This assessment will form part of the future SSD Application.
- There is an opportunity to retain existing vegetation including some large trees in this location.  
**Response:** The proposal will retain much of the existing vegetation on the site, in particular along the Canterbury Road frontage.

On **20 October 2017**, a Request for SEARs was lodged with DP&E for a new six storey 251 bed private hospital and associated facilities, consulting rooms, 60 place child care centre, café, ancillary tenancies and a car park for 433 vehicles. A SEARs response was issued on **17 November 2017** and included a request to prepare a Planning Proposal for the FSR non-compliance.

Following the SEARs response, the applicant's team liaised with Council's strategic planners. Council advised that while a Planning Proposal for a substantial FSR deviation can be lodged to support the hospital use, Council will not support a child care centre in an industrial zone. Accordingly, this Planning Proposal has been prepared in light of this recommendation and the proposed child care centre use has been withdrawn. In addition, while some consultation regarding RMS and Bankstown Airport have been instigated as part of this proposal, it is expected that this Planning Proposal will be referred to these bodies and that further consultation will occur as part of the preparation of a future SSD Application.

### 3.2 Development Concept

The Planning Proposal is to facilitate the redevelopment of the subject site to accommodate a new 251-bed private hospital. The proposal will include operating theatres, associated services and tenancies. The proposal will also include car parking for approximately 433 vehicles, located within three basement levels and landscaping along the street frontages to Canterbury Road and Mavis Street. The proposal will have a height of six storeys above ground level and will have an FSR of 2.73:1. Vehicle access to the car park is from Mavis Street. Indicative photomontages are provided as Figures 6 and 7, with further details provided in Section 6.0 of this report.

The proposal has an estimated CIV of \$134,576,584, is anticipated to generate approximately 300 construction jobs and approximately 200 operational jobs. The proposal is SSD and the Minister for Planning is the consent authority. Accordingly, an EIS for a SSD Application will be lodged separately with the DP&E.



**Figure 6:** Photomontage, as viewed from Mavis Street



**Figure 7:** Photomontage, as viewed from Canterbury Road

## 4.0 STATUTORY PLANNING CONTEXT

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

SEPP (State and Regional Development) 2011 applies to the whole of the state. Clause 8 identifies development as State Significant where a development is not permitted without consent and is listed in Schedule 1 or 2 of the SEPP. Schedule 1 states, inter alia:

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

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

The proposed private hospital will have a CIV of over \$30 million and is therefore considered State Significant. An EIS is currently being prepared in accordance with the SEARs issued on 17 November 2017 and will be submitted following the lodgement of the Planning Proposal, in accordance with DP&E's request.

### 4.2 State Environmental Planning Policy No. 55

SEPP No. 55 – Remediation of Land was gazetted on 28 August 2005 and applies to the whole of the State. Clause 7(1) requires the consent authority to consider whether land is contaminated prior to the consent of development on that land.

A Phase 1 Preliminary Site Investigation was prepared by ADE Consulting Group and forms part of this submission. This investigation assesses the potential for contamination on the site, summarises the findings and provides discussion of the outcomes in light of the proposed development. It is expected that a Stage 2 Site Investigation will be prepared as part of the future SSD Application and Council advised that a Phase 1 Report would be accepted for the Planning Proposal application on this basis. Further details are provided in Section 5.0 of this report.

### 4.3 Bankstown Local Environmental Plan (LEP) 2015

The subject site is zoned IN1 General Industrial (see Figure 8 on the following page). The subject site is not a heritage item nor is it within a conservation area.

#### 4.3.1 Objectives

The objectives of the IN1 General Industrial zone state, inter alia:

##### 1 Objectives of zone

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.

The Planning Proposal will not change the existing zoning. Accordingly, the objectives that apply to the IN1 zone will continue to apply and the proposed hospital will satisfy the most relevant objective by providing a significant increase in employment opportunities.

### 4.3.2 Permissibility

The list of permissible and prohibited uses in the IN1 zone under the Bankstown LEP are stated, inter alia:

#### 2 Permitted without consent

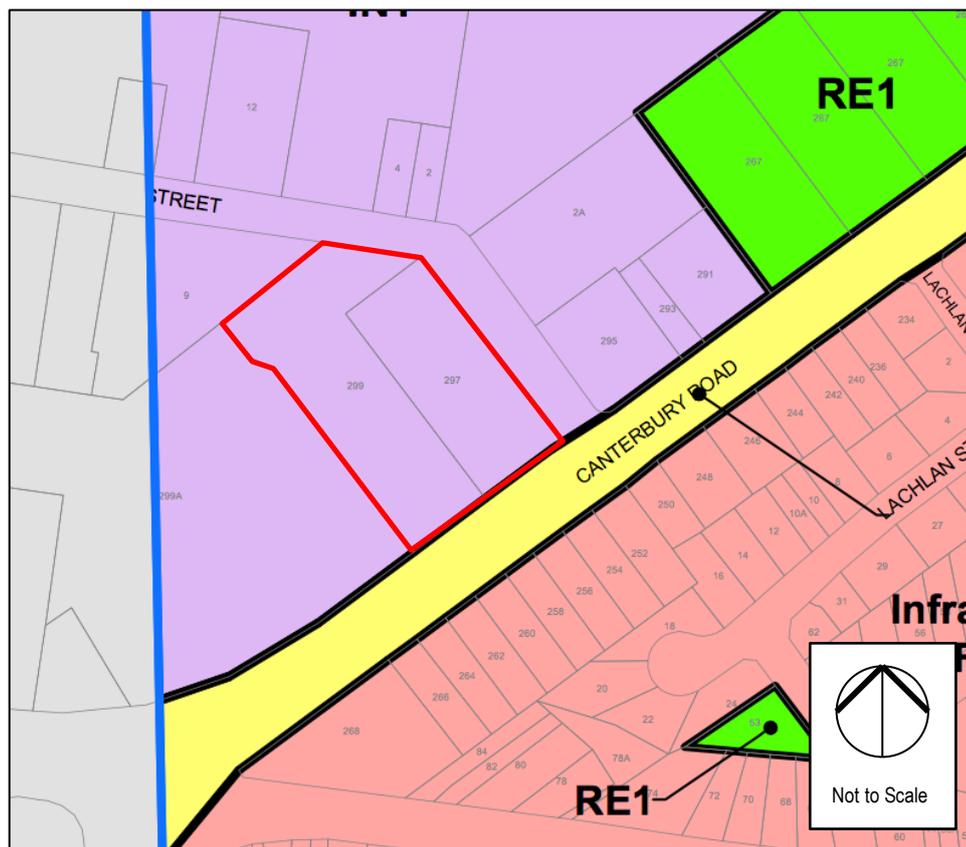
Nil

#### 3 Permitted with consent

Agricultural produce industries; Building identification signs; Business identification signs; Depots; Food and drink premises; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Hospitals; Industrial training facilities; Kiosks; Landscaping material supplies; Light industries; Markets; Medical centres; Neighbourhood shops; Places of public worship; Plant nurseries; Roads; Timber yards; Vehicle sales or hire premises; Warehouse or distribution centres; Any other development not specified in item 2 or 4

#### 4 Prohibited

Agriculture; Air transport facilities; Airstrips; Amusement centres; Biosolids treatment facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Centre-based child care facilities; Charter and tourism boating facilities; Commercial premises; Eco-tourist facilities; Entertainment facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Function centres; Health services facilities; Heavy industrial storage establishments; Home occupations (sex services); Industries; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Port facilities; Residential accommodation; Respite day care centres; Restricted premises; Rural industries; Schools; Sewage treatment plants; Signage; Tourist and visitor accommodation; Water recreation structures; Water recycling facilities; Wharf or boating facilities; Wholesale supplies



**Figure 8: Zoning Plan**

Source: Bankstown LEP, 2015

Hospitals are a permitted use with development consent and a maximum FSR of 1:1 currently applies to the site. The proposed hospital will have an FSR of 2.73:1 and will exceed the current development standard. There is no development standard for height for the subject site. Notwithstanding this, given the proximity of the site to Bankstown Airport, the proposed height of the building has been carefully considered and will form part of a future State Significant DA submission.

## 5.0 PLANNING PROPOSAL

This section has been prepared in accordance with the DP&E's *A Guide to Preparing Planning Proposals* which includes: the Objectives and Intended Outcomes; an Explanation of the Planning Provisions; a justification; and consideration of the Guidelines.

### 5.1 Part 1 - Objectives or Intended Outcomes

The objective of this Planning Proposal is to facilitate the development of a private hospital at Nos. 297-299 Canterbury Road, Revesby. The intended outcome of this Planning Proposal is to amend the Bankstown LEP 2015 to apply a maximum FSR of 2.9:1 to the subject site. There will be no change to the zoning.

By increasing the maximum FSR, the development potential of the site also increases in accordance with the desired provision of hospital services contained in various strategic plans and policies.

### 5.2 Part 2 - Explanation of the Planning Provisions

The intended outcomes will be achieved by amending the FSR map in the Bankstown LEP 2015, by applying a maximum FSR of 2.9:1 to the subject site.

### 5.3 Part 3 - Justification

This section will assess the planning proposal against the matters contained in the DP&E's *A Guide to Preparing Planning Proposals*.

#### 5.3.1 Part A - Need for the Planning Proposal

##### ***Q1 - Is the planning proposal a result of any strategic study or report?***

No. The Planning Proposal has resulted from a recommendation of the DP&E as part of their SEARs response rather than any specific strategic study or report. However, the proposal is consistent with the principles outlined in *A Plan for Growing Sydney* and the *Draft South District Plan*.

##### ***Q2 - Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?***

Yes. The Planning Proposal facilitates the requested site-specific changes to planning controls for the purpose of developing a private hospital on the site without compromising the integrity of the Bankstown LEP 2015.

An option of rezoning was considered. However, as hospitals are permissible in the IN1 zone, a rezoning would have disrupted the consistency of land zoning along this portion of Canterbury Road. A rezoning would also not provide Council with security that industrial-type uses would be provided on the site, which is what Council envisions in the locality.

Following the SEARs issued by the DP&E and advice from Council, an amendment to the LEP to increase the FSR for the site is the most appropriate means to enable the development of a hospital on the site. The current maximum FSR would not accommodate the extent of services required for a private hospital in the locality.

#### 5.3.2 Part B - Relationship to Strategic Planning Framework

##### ***Q3 - Is the planning proposal consistent with the objectives and actions contained within the applicable regional, sub-regional or district plan or strategy (including any exhibited draft plans or strategies)?***

To assess consistency with the objectives and actions of strategic plans or strategies, the proposal needs to consider Assessment Criteria (a) and (b). This is to be read in conjunction with the relevant strategic assessment under the Section 117 requirements contained in Annexure B.

### Assessment Criteria (a)

- a) *Does the proposal have strategic merit? Is it:*
- *Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or*
  - *Consistent with a relevant local council strategy that has been endorsed by the Department; or*
  - *Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls.*

**Response:** Yes, the proposal is consistent with *A Plan for Growing Sydney*, the current Metropolitan Strategy released in 2014. The site is located within the West-Central Sub-Region under this plan. The proposal would facilitate consistency with Direction 1.10 of the Plan to meet the growing needs for education and health services. Action 1.10.3 identifies a plan to expand health facilities such as hospitals and community health facilities to service Sydney's growing population. As NSW is targeting Western Sydney as part of its Hospitals Growth Program, the proposed increased FSR for the site would facilitate the development of a private hospital that would complement the existing and emerging health care facilities and meet an identified demand. This will also provide an increase in future employment opportunities within an industrial zone and near the Bankstown Airport.

In addition, the *Draft Greater Sydney Region Plan* was released in October 2017 and sets out the vision to 2056 for a metropolis for three cities. The proposal is considered to be broadly consistent with the draft plan and is in specific accordance with the following objectives:

- Objective 4: Infrastructure use is optimised
- Objective 6: Services and infrastructure meet communities' changing needs
- Objective 7: Communities are healthy, resilient and socially connected
- Objective 14: A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities
- Objective 21: Internationally competitive health, education, research and innovation precinct

The subject site is well located to optimise the use of existing infrastructure in accordance with Objective 4. This includes utilising the existing arterial road network in close proximity as well as the various public transport networks. The proposed private hospital will serve the community by providing high-quality health care. This is particularly important as the community ages and is consistent with Objective 6. The health-care services provided will also contribute to a healthier community and satisfy Objective 7. The Hospital will generate significant local employment which will contribute to creating a 30-minute city in accordance with Objective 14. This is also achieved through the integration of land use and transport by the site's proximity to bus and rail public transport services. Objective 21 is met by providing high quality health care services in proximity to the existing Bankstown Lidcombe Hospital. These have the potential to form an internationally competitive health precinct with knowledge sharing and cluster economic benefits.

The Canterbury Bankstown LGA falls within the South District, identified by the Draft Greater Sydney Region Plan. The proposal is consistent with a number of goals within the document, including *improving 30-minute access to jobs and services by providing additional employment within an area highly accessible by public transport*. In particular, the proposed hospital is consistent with Planning Priority S8 which states, inter alia:

*Growing and investing in health and education precincts and Bankstown Airport trade gateway as economic catalysts for the District.*

The proposal is in proximity to Bankstown-Lidcombe Public Hospital which will create knowledge sharing and cluster economic benefits. The proposed hospital will also provide significant local employment opportunities. Accordingly, the proposal will facilitate growth as an economic catalyst for the district.

In addition, the proposed hospital is consistent with the 12 strategies priorities released by the NSW Premier as *NSW Making It Happen*. In particular, the hospital will invest in infrastructure and services and enhance the provision of medical services within the Sydney Metropolitan Area. This will generate additional local employment and has the potential to cut surgery waiting times.

**Assessment Criteria (b):**

- b) *Does the proposal have site-specific merit, having regard to the following:*
- *the natural environment (including known significant environmental values, resources or hazards) and;*
  - *the existing uses, approved uses, and likely future uses of land in the vicinity of the proposal and;*
  - *the services and infrastructure that are or will be available to meet the demands arising from the proposal and;*
  - *any proposed financial arrangements for infrastructure provision.*

**Response:** The proposal appropriately responds to the existing natural environment of the site, including suitable drainage and landscaping provisions and is subject to investigations that will render the site suitable for a hospital use, which is permissible in the zone.

The site is located near other health land-uses which are likely to complement each other. As noted, the proposal is in proximity to arterial road networks and public transport in the form of buses and heavy rail stations. These facilities are available to meet the transport demands arising from the proposal, creating a more efficient use of existing infrastructure. Accordingly, the proposal is considered to have strategic merit.

**Q4 - Is the planning proposal consistent with Council's local strategy or other local strategic plan?**

Yes. Canterbury Bankstown Council have generated Local Area Plans for the majority of the LGA. The subject site appears to be located between the North Central and South East areas and, as such is not encapsulated by these plans. A Specialised Centre Plan is currently being prepared which applies to Bankstown Airport and the Milperra and Condell Park Industrial Precincts. This will likely include the subject site.

However, Council has also undertaken strategic citywide studies including the Employment Lands Study which was formally adopted on 22 September 2009. This document refers to the Airport – Milperra Specialised Centre which includes the subject site. This area is recognised as being a key employment generator for the LGA with a focus on deepening its economic base. The proposed hospital will provide significant local employment with a different land-use which will increase the economic resilience of the area. Accordingly, the planning proposal is consistent with the Employment Lands Study.

**Q5 - Is the planning proposal consistent with applicable State Environmental Planning Policies?**

Yes. There are a number of SEPPs that apply to the subject site which relate to matters that would be considered as part of an EIS for the subject site. In our opinion, the Planning Proposal is consistent with the relevant SEPPs that apply to the subject site (see Annexure A).

**Q6 - Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)?**

Yes. An assessment of the proposal against the relevant Section 117 directions is attached as Annexure B.

### 5.3.3 Section C - Environmental, Social and Economic Impact

**Q7 - Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, would be adversely affected as a result of the proposal?**

No. The subject site is within an established industrial zone and urban area that is not identified as having any ecological significance. An assessment of the environmental impacts of any future development of the site would be undertaken as part of an EIS.

**Q8 - Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?**

No. The planning proposal is unlikely to result in any adverse environmental impacts. Any impacts associated with the future redevelopment of the site would be considered as part of a more detailed EIS submission. Documents including a Traffic Report, Stage 1 Environmental Investigation and a Flood Report have been prepared in support of the Planning Proposal and this is outlined in Section 6.0 of this report.

**Q9 - Has the planning proposal adequately addressed any social and economic effects?**

Yes. It is our opinion that the planning proposal would have a positive social and economic impact. As outlined, a higher FSR would allow for its orderly development in accordance with the provisions of the EP&A 1979 as well as relevant Local and State planning policies and strategies. The Planning Proposal will facilitate the development of a 251-bed private hospital and associated facilities which will be accessible to the local and wider community. Importantly, the proposal will provide local employment and has the potential to generate economic multipliers. Further details on the social and economic benefits of the proposal is contained in Section 7.0.

### 5.3.4 Section D - State and Commonwealth Interests

**Q10 - Is there adequate public infrastructure for the planning proposal?**

Yes. The subject site is located within an established urban area which is currently serviced with adequate water, sewer and electricity infrastructure which can be upgraded for future development. Furthermore, the proposal is located in proximity of a variety of public transport connections including the bus network operating along Canterbury Road and nearby train stations. These would increase the transport sustainability of the proposal. Further details of traffic, transport and associated recommendations are outlined in the Traffic and Parking Report which forms part of this submission.

**Q11 - What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway determination?**

Preliminary consultation has been undertaken as part of the Planning Proposal. The proposal will be referred to relevant public authorities as part of the Gateway assessment. It is our opinion that the proposal will not adversely impact on the interest of any State or Commonwealth authority.

## 5.4 Part 4 – Mapping

In order to give effect to the planning proposal, a mapping amendment will be required. This is set out in Table 1.

TABLE 1: PROPOSED MAPPING AMENDMENTS TO BANKSTOWN LEP 2015	
Bankstown LEP Map Sheet Number	Proposed Amendments
Floor Space Ratio Map Sheet FSR_005	Apply a Floor Space Ratio of 2.9:1 to the entire subject site

It is understood Council will prepare maps of the proposed LEP amendment should it support the planning proposal.

## 5.5 Part 5 – Community Consultation

The requirements for community consultation will be detailed by the Gateway Determination issued by the DP&E. It is anticipated the planning proposal will be exhibited by Council in accordance with the requirements of Section 57 of the EP&A Act 1979 and as required by the recommendations of the Gateway Determination.

Community consultation will be undertaken during the preparation of an EIS for the proposed hospital in accordance with the relevant requirements. Notification of the community consultation will be provided in a local newspaper and on Council's website. In addition to this, adjoining landowners will be notified in writing. The community will be given the opportunity to make written submissions during the public exhibition period.

During the public exhibition period the following documents will be placed on public exhibition:

- Planning Proposal
- Gateway Determination
- Relevant Council reports
- Maps
- Any additional studies required by the Gateway Determination

The duration of the community consultation is typically determined by Council, in accordance with the requirements of the DP&E.

## 6.0 ENVIRONMENTAL PLANNING EVALUATION

This section provides a preliminary environmental planning evaluation of architectural drawings for a proposed private hospital submitted as part of this application. The assessment provides commentary on the built form; amenity; and traffic and parking implications of a private hospital that could be developed on the subject site. A detailed assessment against the statutory and non-statutory controls would be undertaken in a future State Significant DA submission.

### 6.1 Description of the Proposal

The architectural plans prepared by Vavayis Architects show demolition of the existing industrial structures on the site and the construction of a new six storey private hospital containing 251 beds, 433 car parking spaces, associated hospital facilities and tenancies. The proposal will have an FSR of 2.73:1 and will include the following elements:

#### Basement Levels

- Three basement levels for 433 vehicles
- Pathology services
- Imaging services

#### Ground Floor Level

- Seven tenancies, including a pharmacy
- Café and gift shop
- GP Clinic
- Hydrotherapy pool
- Back of house facilities
- Carpark entry to basement level and exit from Mavis Street, drop off areas and loading bays from Mavis Street
- Landscaping works

#### Level 1

- 11 operating theatres and associated pre and post-operative services
- Intensive care unit
- Central sterile services area

#### Levels 2, 3 and 4

- Wards and nurses' stations
- Landscaped courtyards (Level 2 only)

#### Level 5

- 15 tenancies

### 6.2 Environmental Planning Evaluation

As indicated in Section 4.0, SEPP Bankstown LEP 2015 and SEPP No. 55 and are applicable to the subject site and proposal. The non-statutory document is the Bankstown DCP 2015.

Any future development application would be assessed in detail under the development standards and controls prescribed in the LEP and DCP respectively. The built form impacts, amenity impacts, car parking/traffic, flooding and contamination implications are discussed in the following sections.

### 6.2.1 Built Form Impacts

The site is largely surrounded to the north, east and west by industrial development of up to two storeys (and in some cases visually three storeys) in height. While the proposal will be higher than the surrounding development, its location on a corner, at the intersection of Canterbury Road and Mavis Street provides the opportunity for a higher “landmark” style building. In addition, the proposal is well articulated at street level and given the proposed setbacks location within an industrial zone, will not likely create unreasonable amenity impacts and this is outlined in Section 6.2.2 of this report.

### 6.2.2 Amenity Impacts

The proposal has been designed to ensure that any nearby residences maintain a high level of amenity. The solar access, privacy and view impacts are discussed in the following paragraphs.

#### Solar Access

The site is located approximately 27m away from the nearest dwelling houses, located on the opposite side of Canterbury Road. The proposed works will therefore unlikely create overshadowing onto north facing living areas or private open space. This will be supported by shadow diagrams which will form part of a future SSD Application.

#### Privacy

The proposal has been designed to protect the aural and visual privacy between the hospital and surrounding uses. A private hospital is not ordinarily a high noise generating use. Given the site is surrounded on three sides by industrial uses and is at least 27m from the nearest residential properties to the south, there will unlikely be unreasonable aural and visual privacy impacts.

The proposed entrance to the car parking in area is also located in Mavis Street, which faces the industrial developments and will therefore not create unreasonable noise impacts to adjoining development. This will be outlined in an Acoustic report that will accompany a future SSD Application.

#### Views

There are currently no significant views from the site or adjoining properties. Accordingly, in our opinion, the proposal will not result in adverse impacts on adjoining properties in respect of view affectation.

### 6.2.3 Impact on Bankstown Airport

The site is located close to Bankstown Airport and is subject to an Obstacle Limitation Surface (OLS) of 51.00 AHD. The proposal, at 54.00 AHD, will breach the OLS. However, consultation with Bankstown Airport Limited has indicated that in the event of a breach in OLS, the proposal will be referred to them and other referral bodies following submission to Council and/or DP&E for assessment. An independent aviation assessment will also be undertaken as part of the preparation of the EIS which will be submitted with a future SSD Application, which will also inform Bankstown Airport and other referral bodies.

### 6.2.4 Traffic and Parking

A Traffic and Parking report has been prepared by TTPP Transport Planning and is submitted with this document. The report concludes, inter alia:

Based on the traffic and transport analysis and discussions presented within this report, the following conclusions are made:

- The Planning Proposal seeks to amend the current planning controls to permit a maximum FSR of 2.9:1 to provide a 251-bed private hospital and associated ancillary clinical facilities with a total gross floor area (GFA) of some 25,000m<sup>2</sup>.
- It is proposed to provide a basement car park, containing some 433 car parking spaces, with access off Mavis Street. This provision of parking satisfies the recommended car parking rates set out in the Roads and Maritime Guide, noting that Council does not specify any car parking rates for private hospital developments. Additionally, appropriate allocation of loading, drop-off/pick-up and bicycle facilities will be provided.

- The car park layout and associated elements are proposed to be designed in accordance with the design requirements as set out in the relevant Australian Standards. All vehicular access points are proposed to be provided off Mavis Street. The existing vehicle access on Canterbury Road will be removed as part of the proposed development.
- The proposed development is anticipated to generate up to 270 and 329 two-way vehicle movements in the morning and afternoon peak hours, respectively.
- At present, excessive delays are currently experienced for right-turn movements to/from Mavis Street during peak periods, which is not unusual for side streets located on a main road (i.e. Canterbury Road). However, delays are expected to be significantly increased in the future, irrespectively of the proposed development and as such, should be upgraded to improve movements to/from Mavis Street.
- Traffic modelling results indicated that the existing priority controlled, seagull Canterbury Road-Mavis Street intersection would need to be upgraded to provide an acceptable intersection performance in the future with traffic generated by the proposed private hospital.
- The Roads and Maritime warrants for traffic signals will be satisfied with the traffic generated by the proposed private development.
- The proposed signalisation of the Canterbury Road-Mavis Street intersection would result in the intersection performing at LoS A and D in the morning and evening peak, respectively, in Year 2027 with traffic generated by the proposed development. Furthermore, the proposal would improve access to/from Mavis Street and pedestrian crossing opportunities.
- The traffic modelling will be further refined as part of the EIS Transport and Accessibility Report submission, with additional traffic surveys undertaken, including at the existing site, other surrounding intersections and at a comparably private hospital site, to update the traffic model and assessment accordingly.

Overall, it is concluded that the traffic and parking aspects of the proposed development could be satisfactorily accommodated on the surrounding road network.

Accordingly, in our opinion, the proposed design for a private hospital is appropriate from a traffic and parking point of view.

### 6.2.5 Flooding

A Flood Risk Assessment and Stormwater Management Report has been prepared by Northrop and forms part of this submission. The report assesses the flood risks on the site and includes recommendations to mitigate potential flood impacts on the site and neighbouring development. The report also outlines a stormwater management strategy for the proposed development. The report concludes, inter alia:

Northrop has been engaged by Canterbury Bankstown Private Hospital Pty Ltd to prepare a flood risk assessment and stormwater management plan in support of a Planning Proposal submission to the City of Canterbury Bankstown Council for the proposed development at 297- 299 Canterbury Road, Revesby.

The department of planning has issued a SEARs (Secretary's Environmental Assessment Requirements) for the development. The Council requires a flood risk assessment management report to be submitted for review as part of a planning proposal prior to progression to EIS (Environmental Impact Statement).

The flood risk assessment has been undertaken in accordance with Council's Stormwater System Report (flood information), Council's Salt Pan Creek Catchments Floodplain Risk Management Study & Plan (December 2013), Bankstown Development Control Plan 2015 – Part B12 Schedule 5 and NSW Floodplain Development Manual.

The report finds that the site is affected by overland flow through the existing stormwater easement. The flood risk management strategies and controls are recommended to mitigate potential flood impact on the site and on the neighbouring property.

The stormwater management strategy including On-Site Detention, stormwater quality targets and stormwater drainage are to be designed in accordance with Bankstown Council's Development Engineering Standards and AS3500.3. This report has commented on the anticipated stormwater management strategy, so to illustrate that the future EIS stormwater can readily meet requirements.

### 6.2.6 Site Contamination

A Phase 1 Preliminary Site Investigation was prepared by ADE Consulting Group and forms part of this submission. This report assesses the potential for contamination on the site, summarises the findings

based on a site walkover and visual inspection, and provides discussion of the outcomes of this investigation. The report concludes, inter alia:

Areas that may be impacted by potential contamination were identified on the basis of the available Site information and during the Site inspection. Based on the data and evidence collected, the potential for contamination to be present within the Site is considered Moderate to High.

The information collected during the historical assessment and Site inspection indicate that the Site is generally suitable for the intended redevelopment as a private hospital subject to the following being addressed:

- A Phase II Detailed Site Investigation (DSI) is required to determine that the Site is suitable for the proposed development. The works should investigate for the following:
  - An intrusive subsurface investigation throughout the Site to target the fill materials / groundwater and determine the lateral and vertical extent (if any) of potential contaminants of concern (i.e. BTEX, Heavy metals, PAHs, TPHs, OCPs & OPPs, PCBs, Cyanide, Ammonia, Nitrate, Acetone, Ethyl Methyl Ketone, Ethyl Glycol M Ether, Dibutyl Ether, pH and Asbestos), identified within as Potential Contamination Types (refer to section 5.1)

## 7.0 ADDITIONAL INFORMATION

A private hospital, co-located in close proximity to the existing Bankstown-Lidcombe Hospital will assist in serving the growing population of Western Sydney. This section will present a number of compelling planning reasons to support the proposed additional FSR. These include:

- The suitability of the site;
- The necessity of the land-use; and
- Healthy planning and aging population benefits.

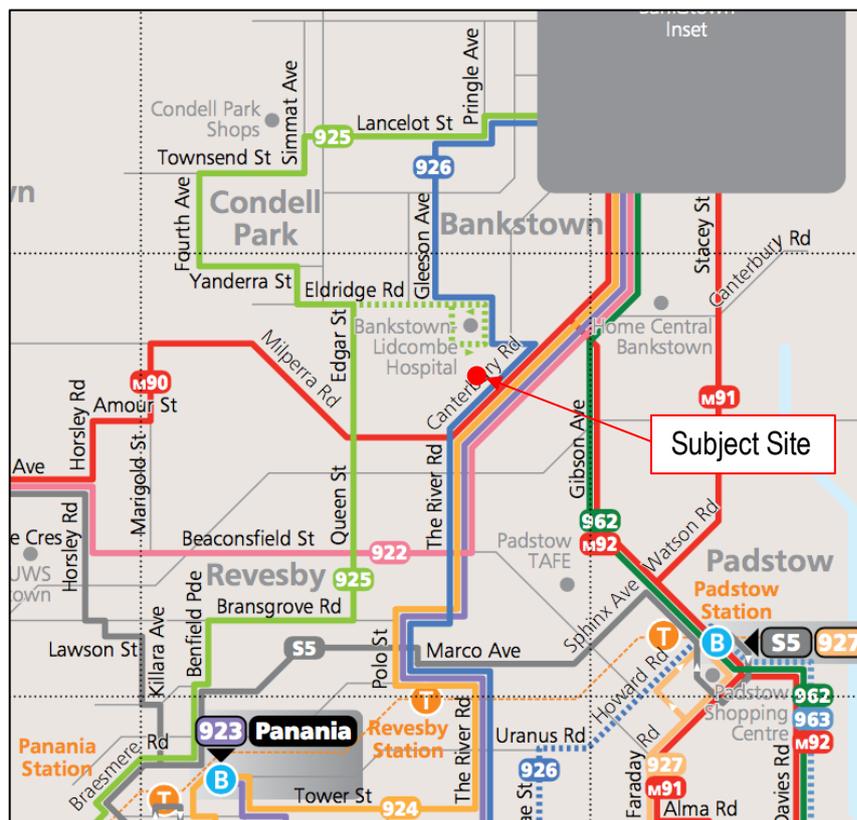
These will be addressed individually below.

### 7.1 The Suitability of the Site

The site is conveniently located off major transport gateways and arterial roads such as the M5 Motorway and Canterbury Road (see Figure 9). These roads provide efficient access to the subject site for staff, the general public and emergency vehicles. The subject site is readily accessible by public transport, with a number of bus routes running along Canterbury Road adjacent to the subject site. These routes include Nos. 922, 923, 924, 926 and 962 and connect Bankstown to Revesby, East Hills and Menai via the subject site (see Figure 10 on the following page). The site is also within 2km of Revesby Railway Station and 3km of Bankstown Railway Station.



**Figure 9: Surrounding Road Network**



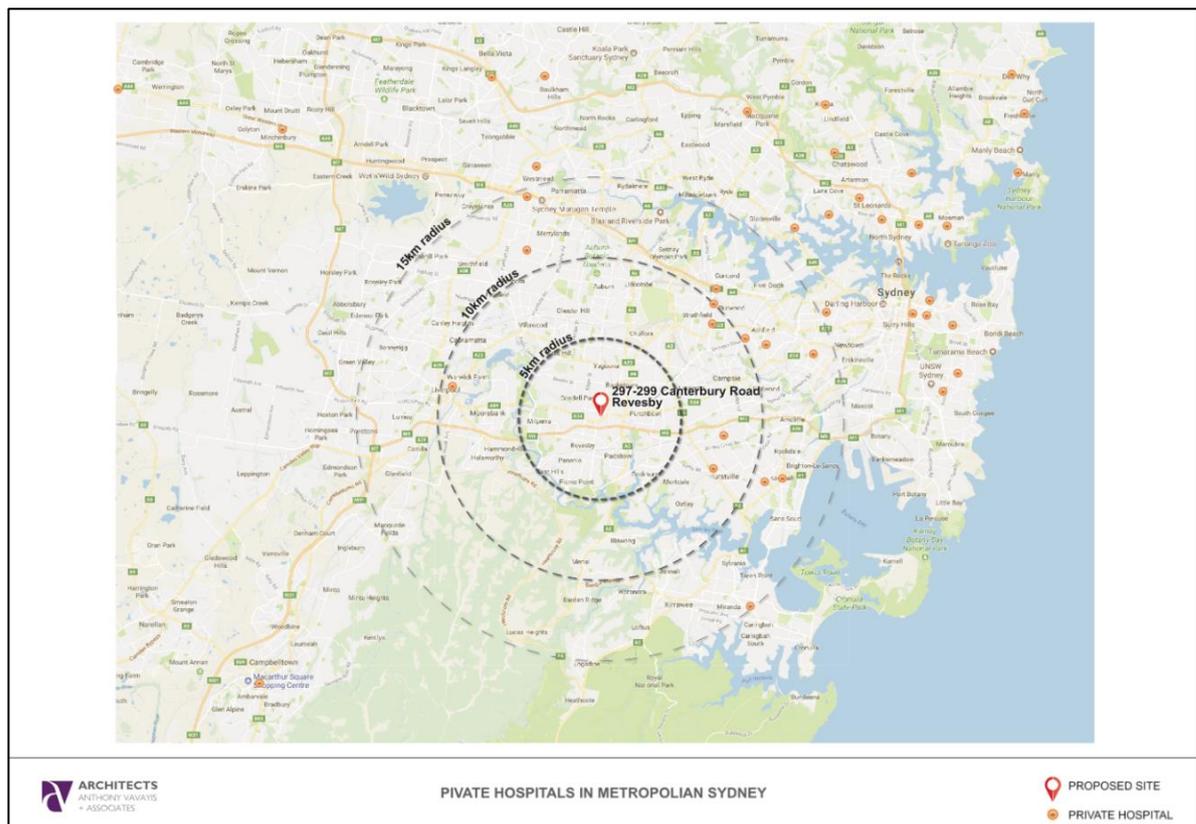
**Figure 10: Existing Bus Network**

Lidcombe-Bankstown Public Hospital is conveniently located within 400m and it is anticipated that health-care employment resources and opportunities will be enhanced as a result. There are distinct knowledge sharing and economic cluster benefits to locating health land uses in close proximity. The Government has stated that it wishes to pursue opportunities for a better mix of services from the private sector for the delivery of infrastructure and public health services.

## 7.2 The Necessity of the Land Use

There are no existing private hospitals within a 5km radius of the subject site and very few within the wider south-west Sydney corridor (see Figure 11 on the following page). With the Sydney population expected to reach 8 million by 2056, and anticipated growth concentrated in the area as a result of the *Sydenham to Bankstown Corridor Strategy*, demand on infrastructure in the area, including hospitals and health services, will grow.

Residents of the Canterbury-Bankstown area are being forced to seek private medical treatment at private hospitals located a significant distance from Bankstown, such as Kogarah (St George Private) and Baulkham Hills (Norwest Private). Due to the inconvenience to patients and in many cases lack of transport options, many patients do not have a choice and seek treatment in more conveniently located public hospitals, such as Lidcombe-Bankstown Public Hospital for their care. As a result, many beds in public hospitals are being occupied by privately insured patients instead of being made available for the patients that, unfortunately, have no choice but to rely on public health care. According to Infrastructure NSW in 2014, if 50 percent of the private activity in public hospitals is moved to the private sector, the capacity freed-up would be the equivalent of five years of future demand growth. The provision of a new private hospital potentially reduces the burden on the public system and may generate up to 200 new employment positions during its operation.



**Figure 11: Private Hospitals in Metropolitan Sydney**

The proposed private hospital will assist in managing demand on existing public infrastructure. NSW Health delivers health care services to 7 million people each year and health and hospitals in Western Sydney are often described as being at breaking point. With a growing population, there are already long elective surgery waiting lists. There is a stated need to implement reforms that will increase the private capacity to reduce the need for investment in new public facilities, especially in fast-growing areas, such as a Canterbury-Bankstown. Chapter 8 on *Health of Infrastructure NSW's State Infrastructure Strategy Update 2014* notes Western Sydney and South Western Sydney Local Health Districts will experience the greatest increases in acute health service activity, with increases of 91 percent and 80 percent respectively by 2032, placing pressure on major hospitals at Liverpool and Westmead.

Health facilities are anchors for employment, comprising 12% of jobs and this rate is growing at 2% each year. Between 1996 and 2016, the highest jobs growth occurred in the health and education sector (73%) and this illustrates the potential of the health and education sector to play a significant economic role in the South District's future. NSW has a relatively smaller private hospital system and more public hospital beds per capita than any other Australian States and Territories. Investing in health services supports economic growth and contributes to the attractiveness as a place to live and do business.

The private sector's capacity needs to grow for patients to use their health insurance. Infrastructure NSW recommends the Ministry of Health pursue reforms that will increase the private (and not-for-profit) market capacity in order to reduce the need for investment in new public facilities. The projected levels of activity growth cannot be accommodated without significant reforms to health service delivery models. According to Infrastructure NSW, without ongoing reform, a new hospital the size and scale of Westmead Hospital would be required to be built every two years.

### 7.3 Healthy Planning and Aging Population Benefits

The hospital incorporates a number of facilities that focus on rehabilitation and obesity. The in-house rehabilitation facility (including the hydro-therapy pool) will be able to service a growing, ageing population. NSW Ministry of Health projections suggest demand for acute services will grow by 48 percent over 20 years and the number of people over age 70 is expected to double by 2031 and this group is expected to use 56 percent of acute health services. At present, there are substantial waiting lists at the nearest rehabilitation facilities located at Westmead and Strathfield.

There is expected to be significant demand for an in-house obesity clinic. The *2015 Population Health Survey* by the NSW Ministry of Health indicates that around 52% of the adult population in South District is overweight or obese. Obesity is a chronic medical condition which is associated with a wide range of debilitating and life-threatening conditions. In addition to this, the 2016 Census identified over 34,475 people living with a disability in the Inner South West (SA4) District with expectations this will increase significantly over the next 20 years, as our population ages.

Finally, it is anticipated that the facility will have a significant advantage in being purpose-built to accommodate the latest advances in medical technology and equipment so that the residents of Canterbury-Bankstown can be better served.

## 8.0 CONCLUSION

This report has been prepared in support of a Planning Proposal to amend the Bankstown Local Environmental Plan (LEP) 2015, to facilitate the development of a private hospital at Nos. 297-299 Canterbury Road, Revesby. The amendment is to apply a maximum FSR of 2.9:1 to the entire site.

The current FSR of 1:1 relates to industrial uses such as factories and warehouses, which are typically single storey and in some cases two storeys only. As the proposal is for a private hospital which is permissible in the IN1 zone, the spatial requirements to accommodate this type of use are higher than for traditional industrial uses and therefore a 2.9:1 FSR for the site is appropriate.

The proposed hospital is considered State Significant Development and an EIS is currently being prepared in response to a SEARs issued by the DP&E, to support a future DA. The EIS will assess the proposal against the relevant State and Council strategic and Statutory provisions.

This Planning Proposal has been prepared in accordance with the DP&E Guidelines and is consistent with the considerations contained therein. In our opinion, there are compelling reasons for supporting this Planning Proposal. The proposal is consistent with the metropolitan strategy, the draft regional strategy as well as other State and Council strategies. The proposal will assist in meeting the growing demands for health infrastructure in metropolitan Sydney, particularly in the South-West corridor and has received in-principle support from Canterbury-Bankstown Council in the past.

The proposed hospital is co located in proximity to the Bankstown-Lidcombe Public Hospital. This will support the growth of smart jobs and is in accordance with the relevant directions of *A Plan for Growing Sydney* and the *Draft South District Plan*. The proposal also satisfies the criteria for Planning Proposals established by the DP&E. In addition, the planning proposal is consistent with Section 117 Directions that have been issued by the Minister for Planning.

In addition, this Planning Proposal includes a brief assessment of architectural plans and includes supporting documentation for a hospital on the site. The plans and supporting documentation, including a Phase 1 Site Investigation Report, a Flood Report and a Traffic Report demonstrate that there would unlikely be adverse impacts on the amenity of surrounding development. It is noted that this plan would be the subject of a future development application with the DP&E.

Accordingly, for the above reasons, we consider an FSR increase to 2.9:1 to be justified and appropriate on the subject site from a planning point of view.

## **ANNEXURE A: LIST OF SEPPS**

SEPP	APPLIES/COMMENTS
SEPP No 1—Development Standards	Not Applicable LEP is a Standard Instrument Format and includes Clause 4.6 Exception to Development Standards
SEPP No 14—Coastal Wetlands	Not Applicable
SEPP No 15—Rural Landsharing Communities	Not Applicable
SEPP No 19—Bushland in Urban Areas	Applies, however not relevant in this instance as subject site does not have bushland nor is it zoned for public open space
SEPP No 21—Caravan Parks	Applies, however not relevant in this instance as a Caravan Park is not proposed
SEPP No 26—Littoral Rainforests	Not Applicable
SEPP No 30—Intensive Agriculture	Applies, however not relevant in this instance as intensive agriculture is not proposed
SEPP No 33—Hazardous and Offensive Development	Applies –proposed development is unlikely to be considered hazardous or offensive, and will be assessed as part of a future EIS
SEPP No 36—Manufactured Home Estates	Not Applicable
SEPP No 44—Koala Habitat Protection	Not Applicable
SEPP No 47—Moore Park Showground	Not Applicable
SEPP No 50—Canal Estate Development	Not Applicable
SEPP No 52—Farm Dams and Other Works in Land and Water Management Plan Areas	Not Applicable
SEPP No 55—Remediation of Land	Applies – refer to Preliminary Site Investigation and will also be addressed further as part of EIS
SEPP No 62—Sustainable Aquaculture	Not Applicable
SEPP No 64—Advertising and Signage	Applies - Matter for consideration at the time of any Signage DA
SEPP No 65—Design Quality of Residential Flat Development	Not Applicable
SEPP No 70—Affordable Housing (Revised Schemes)	Applies, however not relevant in this instance as housing is not proposed
SEPP No 71—Coastal Protection	Not Applicable
SEPP (Affordable Rental Housing) 2009	Applies – however not relevant in this instance as housing is not proposed
SEPP (Building Sustainability Index: BASIX) 2004	Not Applicable
SEPP (Exempt and Complying Development Codes) 2008	Applies however not relevant in this instance
SEPP (Housing for Seniors or People with a Disability) 2004	Applies, however seniors housing is not proposed
SEPP (Infrastructure) 2007	Applies – Although a health care facility is proposed, Cl. 56-58C do not apply as the site is not within a prescribed zone. Cl. 101 and Cl. 102 would also need to be considered as the subject site fronts a classified road.
SEPP (Kosciuszko National Park—Alpine Resorts) 2007	Not Applicable
SEPP (Kurnell Peninsula) 1989	Not Applicable
SEPP (Major Development) 2005	Applies, the site is identified as SSD
SEPP (Mining, Petroleum Production and Extractive Industries) 2007	Applies, however not relevant as mining, petroleum production or extractive industries are not proposed uses of the site
SEPP (Miscellaneous Consent Provisions) 2007	Applies, may be relevant for temporary structures
SEPP (Penrith Lakes Scheme) 1989	Not Applicable
SEPP (Three Ports) 2013	Not Applicable
SEPP (Rural Lands) 2008	Not Applicable

SEPP (SEPP 53 Transitional Provisions) 2011	Not Applicable
SEPP (State and Regional Development) 2011	Applies, the site will be assessed as SSD
SEPP (Sydney Drinking Water Catchment) 2011	Not Applicable
SEPP (Sydney Region Growth Centres) 2006	Not Applicable
SEPP (Urban Renewal) 2010	Applies, however not relevant as subject is not within an identified precinct
State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017	Not Applicable
SEPP (Western Sydney Employment Area) 2009	Not Applicable
SEPP (Western Sydney Parklands) 2009	Not Applicable
<b>Regional Environmental Plans – Deemed SEPPs</b>	
SREP (Sydney Harbour Catchment) 2005	Not Applicable
SREP No 8 - Central Coast Plateau Areas	Not Applicable
SREP No 9 - Extractive Industry (No 2 – 1995)	Not Applicable
SREP No 16 - Walsh Bay	Not Applicable
SREP No 18 - Public Transport Corridors	Not Applicable
SREP No 19 - Rouse Hill Development Area	Not Applicable
Sydney Regional Environmental Plan No 20— Hawkesbury-Nepean River (No 2—1997)	Not Applicable
SREP No 24 - Homebush Bay Area	Not Applicable
SREP No 26 - City West	Not Applicable
SREP No 30 - St Marys	Not Applicable
SREP No 33 - Cooks Cove	Not Applicable

## **ANNEXURE B: Consideration of Section 117 Directions**

<b>SECTION 117 DIRECTIONS</b>	<b>APPLICABLE</b>
<b>1. Employment Resources</b>	
1.1 Business and Industrial Zones	Applicable (see A1.0)
1.2 Rural Zones	Not Applicable
1.3 Mining, Petroleum Production and Extractive Industries	Not Applicable
1.4 Oyster Aquaculture	Not Applicable
1.5 Rural Lands	Not Applicable
<b>2. Environment and Heritage</b>	
2.1 Environment Protection Zones	Not Applicable
2.2 Coastal Protection	Not Applicable
2.3 Heritage Conservation	Not Applicable
2.4 Recreation Vehicle Areas	Not Applicable
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs	Not Applicable
<b>3. Housing, Infrastructure and Urban Development</b>	
3.1 Residential Zones	Not Applicable
3.2 Caravan Parks and Manufactured Homes Estates	Not Applicable
3.3 Home Occupations	Not Applicable
3.4 Integrating Land Use and Transport	Applicable (see A2.0)
3.5 Development Near Licensed Aerodromes	Applicable (see A3.0)
3.6 Shooting Ranges	Not Applicable
<b>4. Hazard and Risk</b>	
4.1 Acid Sulfate Soils	Not Applicable
4.2 Mine Subsidence and Unstable Land	Not Applicable
4.3 Flood Prone Land	Flood Report accompanies this submission & a future SSDA
4.4 Planning for Bushfire Protection	Not Applicable
<b>5. Regional Planning</b>	
5.1 Implementation of Regional Strategies (Revoked 17 October 2017)	Not Applicable
5.2 Sydney Drinking Water Catchments	Not Applicable
5.3 Farmland of State and Regional Significance of the NSW Far North Coast	Not Applicable
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	Not Applicable
5.5 Development in the vicinity of Ellalong, Paxton and Millfield (Cessnock LGA) (Revoked 18 June 2010)	Not Applicable
5.6 Sydney to Canberra Corridor (Revoked 10 July 2008. See amended Direction 5.1)	Not Applicable
5.7 Central Coast (Revoked 10 July 2008. See amended Direction 5.1)	Not Applicable
5.8 Second Sydney Airport: Badgerys Creek	Not Applicable
5.9 North West Rail Link Corridor Strategy	Not Applicable
5.10 Implementation of Regional Plans	Applicable (see A4.0)
<b>6. Local Plan Making</b>	
6.1 Approval and Referral Requirements	Applicable
6.2 Reserving Land for Public Purposes	Not Applicable
6.3 Site Specific Provisions	Not Applicable

<b>7. Metropolitan Planning</b>	
7.1 Implementation of A Plan for Growing Sydney	Applicable (see A5.0)
7.2 Implementation of Greater Macarthur Land Release Investigation	Not Applicable
7.3 Parramatta Road Corridor Urban Transformation Strategy	Not Applicable
7.4 Implementation of North West Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not Applicable
7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not Applicable
7.6 Implementation of Wilton Priority Growth Area Interim Land Use Infrastructure Implementation Plan	Not Applicable

## CONSIDERATION OF RELEVANT SECTION 117 MINISTERIAL DIRECTIONS

### A1.0 - Direction 1.1 – Business and Industrial Zones

This direction applies to all planning proposals that will affect land within an existing or proposed business or industrial zone (including the alteration of any existing business or industrial protection zone boundary). The objectives of this direction are stated, inter alia:

- (a) *Encourage employment growth in suitable locations,*
- (b) *Protect employment land in business and industrial zones, and*
- (c) *Support the viability of identified strategic centres.*

The proposal is consistent with the objectives of Direction 1.1 – Business and Industrial Zones as it will provide the potential for additional employment opportunities, will not reduce or remove business lands and will support the viability of strategic centres identified in the *A Plan for Growing Sydney*.

In this particular instance, the planning proposal must:

- (a) *Retain the areas and locations of existing business and industrial zones,*
- (b) *Not reduce the total potential floor space area for employment uses and related public services in business zones,*
- (c) *Not reduce the total potential floor space area for industrial uses in industrial zones*

The proposal demonstrates there will be no reductions in business land; instead the potential floor space for employment uses will be increased. The proposal is permissible in the industrial zone and will not reduce the total potential floor space for industrial uses. The planning proposal has considered the amended planning controls against relevant state and local planning strategies and has determined it to be consistent with the relevant aims and objectives. In summary, the proposal is consistent with this direction.

### A2.0 - Direction 3.4 – Integrating Land Use and Transport

The direction applies when a relevant planning authority prepares a planning proposal that will create, alter or remove a zone or a provision relating to urban land, including land zoned for residential, business, industrial, village or tourist purposes. The objectives of this direction are stated, inter alia:

- (a) *Improving access to housing, jobs and services by walking, cycling and public transport, and*
- (b) *Increasing the choice of available transport and reducing dependence on cars, and*
- (c) *Reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and*
- (d) *Supporting the efficient and viable operation of public transport services, and*
- (e) *Providing for the efficient movement of freight.*

The proposal is consistent with the objectives of Direction 3.4 due to the site's close proximity to public transport. As indicated, there are a number of bus routes running along Canterbury Road adjacent to the subject site. These routes include Nos. 922, 923, 924, 926 and 962 providing access to and from Bankstown, Revesby, East Hills and Menai. The site is also within 2km of Revesby Railway Station and 3km of Bankstown Railway Station. The site's accessibility to a variety of public transport options satisfies the objectives of the direction as it reduces the dependence on cars. In addition, the provision of business lands will improve access to jobs and services through the maximisation of public transport use. Accordingly, the proposal is consistent with this direction.

### A3.0 – Direction 3.5 - Development Near Licensed Aerodromes

This direction applies where a planning proposal will create, alter or remove a zone or provision relating to land in the vicinity of a licensed aerodrome. This direction is relevant given the site's proximity to Bankstown Airport. The objectives of this direction are stated, inter alia:

- (a) *to ensure the effective and safe operation of aerodromes, and*
- (b) *to ensure that their operation is not compromised by development that constitutes an obstruction, hazard or potential to aircraft flying in the vicinity, and*

- (c) *to ensure development for residential purposes or human occupation, if situated on land within the Australian Noise Exposure Forecast (ANEF) contours of between 20 and 25, incorporates appropriate mitigation measures so that the development is not adversely affected by aircraft noise.*

The proposed private hospital is considered a compatible use with the operation of the aerodrome. The built form will unlikely create an obstruction or flying hazard. This will be confirmed in an airspace assessment that will form part of the future SSD Application to the DP&E. In addition, the site is not proposed for residential purposes. In any event, Bankstown Airport is unlikely to result in significant aural impacts on the development. Any aural impacts that may arise can be addressed in an Acoustic assessment report, that will form part of the future SSD Application.

In particular, the relevant planning authority must:

- (a) *consult with the Department of the Commonwealth responsible for aerodromes and the lessee of the aerodrome,*
- (b) *take into consideration the Obstacle Limitation Surface (OLS) as defined by that Department of the Commonwealth,*
- (c) *for land affected by the OLS:*
- (i) *prepare appropriate development standards, such as height, and*
- (ii) *allow as permissible with consent development types that are compatible with the operation of an aerodrome*
- (d) *obtain permission from that Department of the Commonwealth, or their delegate, where a planning proposal proposes to allow, as permissible with consent, development that encroaches above the OLS. This permission must be obtained prior to undertaking community consultation in satisfaction of section 57 of the Act.*

While the DP&E have undertaken some consultation with Sydney Metro Airports (operator of Bankstown Airport), it is expected that Council will further consult the Commonwealth Department of Infrastructure and Regional Development as well as Sydney Metro Airports.

Bankstown Airport Limited has advised that a maximum OLS height of AHD 51 applies to the Inner Horizontal Surface which the site falls within, and other air services bodies may have varied protected airspace height requirements. The proposed hospital has been designed to minimise impacts on the airspace. However, a separate assessment will be undertaken as part of the SSD Application to ensure that the proposed private hospital will not have an adverse impact on the OLS.

There is no existing height development standard relevant to the subject site. The proposal is designed with consideration to the OLS and will be assessed as part of a future SSD Application. The proposed hospital is permissible in the zone and is considered compatible with the operation of the aerodrome. Accordingly, the proposal is consistent with the objectives and considerations of this direction.

#### **A4.0 – Direction 5.10 – Implementation of Regional Plans**

The *Draft South District Plan* was released in November 2016 and applies to the Canterbury-Bankstown LGA. As important, Section 3.4 of the Plan talks to leveraging health assets as a catalyst to grow smart jobs and states, inter alia:

*We support and encourage the growth of health and other ancillary activities in health and education super precincts and recognise the need to:*

- *plan for the expansion of these precincts*
- *protect surrounding employment areas for health and education and related land use*
- *consider flexibility of zones to accommodate ancillary uses such as health and medical research activities, **private hospitals**, ancillary retail, visitor, key worker and aged accommodation in the right locations*
- *plan for increased access and enhanced urban amenity within and around health and education super precincts;*

*Relevant planning authorities, through the preparation of local environmental plans, should:*

- **provide opportunities for new health and allied service providers to cluster around existing health and education facilities**
- *consider accessibility to the health and education precincts and car parking requirements for patients, students visitors and employees.*

The location of the proposed hospital is in accordance with directions for new health facilities to be clusters around existing facilities, being the Bankstown-Lidcombe Hospital and will contribute to the growth of smart jobs in southern district and specifically, the Canterbury-Bankstown LGA.

A full assessment of the proposal against the relevant sections of the *Draft South District Plan* would form part of the future EIS and SSD Application.

### **A5.0 - Direction 7.1 – Implementation of a Plan for Growing Sydney**

*A Plan for Growing Sydney* was released in December 2014 and applies to the Sydney Metropolitan Area, including the Canterbury-Bankstown LGA. The plan is intended to guide the delivery of housing, employment, infrastructure and open space over the next 20 years.

Direction 1.10 is to “plan for education and health services to meet Sydney’s growing needs.” The proposal which will provide additional health services to support Sydney’s growing population is generally consistent with this directive. The Direction is elaborated on under Action 1.10.3 which states: “continued provision of world-class health services will require an expansion of health facilities such as hospitals...” The proposed private hospital will provide state of the art facilities and services to provide high quality health care.

In addition, the subject site falls within industrial land identified near Bankstown Airport. The plan states, inter alia:

***“Bankstown Airport-Milperra***

*Work with council to identify and protect strategically important industrial-zoned land in and near Bankstown Airport-Milperra for future employment purposes.”*

Attention to industrial land provisions within *A Plan for Growing Sydney* were raised in the DP&E’s response to the first Request for SEARs. However, as the proposal does not seek to rezone the land and hospitals are permissible in the IN1 General Industrial zone, the proposed use is, in our opinion, consistent with the intended use of the zone and consistent with the zone objectives and is therefore acceptable in this instance. Moreover, a planning proposal in relation to this proposed scheme does not reduce the stock of industrial zoned land nor does it eliminate the possibility of the land being used for industrial uses in the future.

A full assessment of the proposal against the relevant sections of *A Plan for Growing Sydney* would form part of the EIS and future SSD Application.

**ANNEXURE C: Supporting Plans, Subconsultant Reports and Documents**  
(provided in folder)