

Planning Proposal Report

445-459 Canterbury Road, Campsie

On behalf of Hailiang Property Group (HPG)

July 2020



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			Name	Signature
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* This document is for discussion purposes only unless signed and dated by the persons identified. This document has been reviewed by the Project Director.

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1 Executive Summary

Introduction

This report has been prepared by *Mecone NSW Pty Ltd (Mecone)* on behalf of Hailiang Property Group (HPG), **(the landowner)**, in support of the planning proposal to City of Canterbury Bankstown Council **(Council)** for the land known as 445-459 Canterbury Road, Campsie **(the site)**.

The site

The site comprises nine blocks, eight lots along Canterbury Road and one lot facing Stanley Street. The lot numbers are as follows:

- Lot 3, DP 337683
- Lot A & B, DP 355656
- Lots A & B, DP 416123
- Lot 15, DP 3995
- Lots A & B, DP 391661
- Lot 13, DP 3995

The site is currently occupied by a mix of retail and commercial tenancy warehouses, including bulky goods retailers and a vehicle mechanic. The site has an 86m frontage to Canterbury Road and a 60m frontage to Stanley Street, with several vehicle access points.

The far rear block of the site and a significant section of the frontage to Canterbury Road are dedicated to hard standing areas and on grade vehicle parking. Small patches of poor quality landscaping line the southern boundary fronting Canterbury Road and western boundary fronting Stanley Street.

Intent of the Planning Proposal

The planning proposal is submitted to amend the Canterbury Local Environmental Plan (CLEP) 2012 height control for the site to enable a transformative vision for the subject site and facilitate the delivery of an important new healthcare and medical facility. The strategic objective and need to improve health and medical capacity and care in this area is clear. This planning proposal will actually facilitate this objective to be realised and enable some of the most urgent needs to be addressed.

More specifically, the aim is to also achieve the following objectives and outcomes:

- To provide a site-specific planning framework that enables a new private hospital development consistent with the current zoning for the site. Site specific DCP controls will also be developed in consultation with Council prior to submission for a Gateway Determination;
- Assist in realising the objectives of the Greater Sydney Commission's South District Plan to achieve at least 7,000 jobs in Campsie Strategic Centre by 2036, plus strengthen links to Canterbury Hospital and surrounding allied health services;

- Initiate the delivery of a new health and medical development within the Eastern Lifestyle and Medical Precinct identified in the Canterbury-Bankstown LSPS – Connective City 2036;
- Address the absence of acute or non-acute private hospitals within the Canterbury-Bankstown LGA; and significant shortfall of hospital bed spaces per capita in the Canterbury area (which is approximately *only one-third* of the national average);
- Assist in achieving the priorities of the Sydney Local Health District Strategic Plan 2018-2023, including to develop, plan and construct new and upgraded health facilities to address significant population growth, increasing demand and ageing infrastructure;
- To enable a scale of built-form which provides the critical mass needed to deliver the range of interrelated facilities and functions of a modern private hospital. This will offer critical additional health services to the Local Health District, which is currently under-supplied for these services;
- Through collaboration, create the opportunity for the services envisaged in the concept design to assist the Sydney Local Health District (SLHD) and Canterbury Hospital meet the demand for health services – reducing pressure on waiting lists; and
- Alongside more detailed controls in a site-specific DCP, to manage the likely effects of the proposal in relation to the amenity of neighbouring lower density residential development; in particular located to the south of Canterbury Road.

In order to achieve this, the planning proposal seeks to change the LEP as follows:

Amend the LEP Height of Building Map in accordance with the proposed height map, which indicates a maximum permissible height of 56 metres on the site.

This approach reflects a taller, narrower concept built form to accommodate the interdependent services and uses within, to meet the identified needs and also functional requirements of a modern private hospital at this location. This also allows flexibility for internal vertical expansion of the most needed facilities or services in the future – whereas horizontal expansion would compromise the functional and clinical efficiency of spaces. This approach to built form also enables the site to offer:

- provision of a rear laneway off Stanley Street to provide vehicular and servicing access to the site (enabling access existing points off Canterbury Road to be closed);
- the laneway will provide the opportunity for a future connection linking through other sites in the block, potentially to Una Street. This will provide options for vehicle access connections and increase permeability of the block, alleviating traffic constraints around this section of Canterbury Road;
- the creation of new public open space as an important community benefit in an area of deficiency, plus amenity space for patients, visitors and workers in the new hospital;
- increased setbacks and separation to properties to the north of the site;

- enhanced natural lighting being available into the new building, to improve the internal environment and reduce reliance on artificial lighting;
- greater scope for internal flexibility and expansion of uses/services; and
- a deep soil area within the site to support new tree planting in an area where there are very few trees – with the potential to extend to a larger pocket park at an adjacent site in the future.

Some balances may need to be struck in terms of environmental effects arising from a taller, narrower building form, but a lower, wider built form to meet the services, facilities and space requirements of a new private hospital would rule out all these benefits.

The project is consistent with the B6 Enterprise Corridor zoning for the site.

The LEP is also to be amended to include a provision that development consent must not be granted for development on land to which this clause applies unless a development control plan that provides for detailed development controls has been prepared.

Strategic Merit Test

The proposal has strategic merit as it aligns with and promotes a number of key strategic planning priorities of Council and the State Government identified within various state, regional and local policies. The intentions of the planning proposal above include these, but specifically the planning proposal is considered to have strategic merit for the following reasons. It will:

- A: Give effect to the objective of the Greater Sydney Commission's South District Plan to support growth in employment to more than 7,000 jobs in Campsie Strategic Centre by 2036 and strengthen links to Canterbury Hospital and surrounding allied health services; and
- B: Give effect to a local strategic planning statement in terms of facilitating and initiating the delivery of a new health and medical development within the Eastern Lifestyle and Medical Precinct identified in the Canterbury-Bankstown LSPS – Connective City 2036. There are limited other sites along this section of Canterbury Road that can initiate and lead the formation of the precinct in the shorter term. This site is ideally located in terms of the urban structure, public transport infrastructure and accessibility to/from Campsie town centre.

The proposal therefore satisfies the strategic merit test, will also promote a number of key strategic planning priorities of Council and Government and responds to the urgent needs identified.

With further regard to reason 'B' above, studies incorporated in this planning proposal report demonstrate how the subject site can become the focal point (functionally and physically) for the Eastern Lifestyle and Medical Precinct. Furthermore, the urban form of both the proposed height and massing for the building can lead future thinking for a structure plan and urban design framework for the transformative change to current urban form needed to establish the wider precinct. Preliminary analysis by

GMU is included in this report and appended as a separate study to support the planning proposal.

Site-Specific Merits

The site-specific considerations identified at this stage and from discussions with Council relate to environmental assessment of factors comprising: Built form, building envelope, urban design and townscape; overshadowing and solar access; traffic, transport and parking; and suitability of the location from a wider structure plan perspective.

The assessments undertaken by the project team and findings are provided, but in summary the main conclusions are as follows:

- In terms of clinical needs, the shortage of acute and non-acute private hospital facilities in the LGA is very clear from the assessment work carried out by Ethos Urban and Mostyn Copper. Regard also needs to be given to ensuring a financially sustainable/viable development at this location which can meet the operational requirements of private health providers. The scale and critical mass of development needed on the site to assist in responding to these factors – and be a catalyst to the realisation of the new Eastern Lifestyle and Medical Precinct is reasonable and appropriate;
- The work undertaken by Team2 Architects and GMU has determined the resulting concept design and necessary built form envelope. Urban design analysis has also been carried out to consider this in the current context of this section of Canterbury Road – and as part of a transformed wider B6 zone block which could be achieved in the realisation of the new Precinct focused on Canterbury Road. Based on the 3D massing studies undertaken, it is reasonable and appropriate to consider increasing the height for subject site located in the B6 zone. Through discussions with Council on associated Site-Specific DCP controls, meaningful technical analysis of solar planes and shadow impacts can be undertaken. Outside of this planning proposal for the subject site, GMU suggests that Council also consider up-zoning the wider B6 block to maximum heights in the range 8-12 storeys to acknowledge the potential of the block in which the subject site is situated.
- Regarding traffic impact, VTG has Identified that a range of strategies could be incorporated into the development of the site in order to manage the potential traffic impact of the development, including implementation of a Green Travel Plan, encouraging access by walking and cycling, and a higher portion of public transport trips and car share users. The Canterbury Road corridor is the focus of various options for changes to managing movement and traffic. It is proposed that through capacity analysis of nearby intersections and further discussions with Council, the measures needed to accommodate the proposed new Height of Building control can be determined for this planning proposal, and in the context of other future potential uplifts within the wider B6 zone.

Conclusion

This report provides a justification of the proposal in line with the Department of Planning and Environment's template. The justification demonstrates that the proposal should proceed on the following grounds:

- It is consistent with Council's land use vision, planning priorities and actions of the Local Strategic Planning Statement – Connective City 2036;
- It is consistent with the Greater Sydney Regional Plan and District Plan;
- Is consistent with relevant Ministerial Directions;
- Responds to a priority of the Sydney Local Health District Strategic Plan 2018-2023 to develop new and upgraded health facilities;
- Will assist in filling the current and critical gap in provision of health services, as the LGA currently has no acute or non-acute private hospitals;
- Will assist in reducing the current significant shortfall in hospital bed spaces per capita in the Canterbury area, which will worsen as a result of population growth;
- Will enable a new sustainable form of development which will deliver social, economic and environmental regeneration in the Canterbury Road corridor;
- Will enable the more effective use of land located on Canterbury Road; with new uses and facilities accessible to the community, plus open space, urban greening and active frontages; contributing to enhancement at street level and 'boulevard' character to Canterbury Road;
- Through a taller narrower built form configuration on the site, multiple benefits can arise compared to a lower and wider form. This includes creating a new rear laneway which will benefit traffic movement along Canterbury Road, plus movement and permeability of this B6 block, community benefits of open space and new tree planting;
- Will manage the likely effects of the proposal in relation to the amenity of residential development; in particular located to the south of Canterbury Road; and
- Will contribute significantly to the provision of jobs and economic growth within the Canterbury-Bankstown region.

The planning proposal can act as a catalyst for major positive change which will accelerate the achievement of the strategic objective to create and grow a new medical precinct – with associated social, healthcare, economic and environmental benefits.

The Executive Director of SLHD, Dr Tim Sinclair has provided a letter of support; recognising the benefits of collaboration between public and private hospitals and explaining how this proposal could assist Canterbury Hospital in meeting the growing demand for health services. The letter is provided at **Appendix 1** to this report.

We look forward to progressing this planning proposal with Council.

1 Introduction

This report has been prepared by *Mecone NSW Pty Ltd* (Mecone) on behalf of Hailiang Property Group (HPG). The site at 445-459 Canterbury Road, Campsie is located in the City of Canterbury Bankstown Local Government Area (LGA), approximately 450 metres from Campsie Town Centre, within 780 metres from Campsie Station, 1.3km west of Canterbury Station and 6.5km west of Bankstown CBD.

The site area is approximately 4,414m² and currently contains a number of large format retail stores and a car servicing/repair business. The site is accessed from Canterbury Road, with a secondary access from Stanley Street. Surface level car parking and yard space is also provided across the remainder of the site not covered by buildings.

HPG propose the demolition of the existing structures on the site and construction of a new private hospital, including access, parking, services, landscaping and open amenity areas (the Proposal). The use is 'Permitted with Consent' under the Canterbury LEP2012 (CLEP2012). The final health services configuration of the site will reflect the services most needed in the region, and it is expected that the facility will provide a range of high-quality medical care including inpatient and outpatient services. These may include emergency and intensive care, maternity, day surgery, cardiac care, dialysis and oncology.

The proposal would also complement Canterbury Hospital by providing a range of private elective procedures and facilities that complement the public health system. It would also attract best-in-class medical practitioners, through offering consulting suites. These will allow and support specialists to practice across two adjacent medical campuses, thus supporting the development of the Eastern Lifestyle and Medical Precinct. Subject to further discussions with Canterbury Hospital, it is also feasible that some public health services may be co-located at the proposed facility.

HPG have identified that other than day surgery, there are currently no acute or sub-acute private hospitals in the Canterbury Bankstown Local Government Area (LGA), with the nearest facilities being located in the Inner West and Georges River Council areas. An overview of the private and public acute hospitals servicing the Sydney region is shown in **Figure 4** in the following section.

Canterbury Bankstown's large, diverse and growing population requires access to a broader range of elective private medical services which would be supported by the facility. The site is close to public transport, main road routes, an NSW ambulance station, Campsie and Canterbury retail/service centres, schools and within easy walking distance of a large residential population. It is ideally located in terms of urban structure.

The site is therefore very well placed to support this type of facility and aligns with Council's strategic plans to build the Eastern Lifestyle and Medical Precinct and supporting Canterbury Hospital by locating complementary medical facilities in the centre.

In order to achieve this, the planning proposal seeks to amend the LEP as follows:

Alter the LEP Height of Building Map in accordance with the proposed height map, appended, which indicates a maximum permissible height of 56 metres on the site.

The LEP is also to be amended to include a provision that development consent must not be granted for development on land to which this clause applies unless a development control plan that provides for detailed development controls has been prepared.

Therefore, to provide further certainty to Council regarding the future built form and key controls, a site-specific DCP will be prepared in consultation with Council and submitted prior to issue of Gateway and public exhibition of the Planning Proposal.

The planning proposal has been prepared in accordance with:

- Section 3.33 of the Environmental Planning and Assessment Act 1979 (the Act);
- The NSW Department of Planning and Environment's '*A guide to preparing Planning Proposals*'; and
- Relevant Section 9.1 Directions.

Specifically, the planning proposal includes the following information:

- A description of the site in its local and regional context;
- A statement of the objectives or intended outcomes of the proposed instrument;
- An explanation of the provisions that are to be included in the proposed instrument; and
- The justification for those provisions and the process for their implementation including:
 - Whether the proposed instrument will comply with relevant directions under Section 9.1;
 - The relationship to the strategic planning framework;
 - Environmental, social and economic impacts (including urban design; massing and scale; overshadowing and solar access; traffic and transport);
 - Any relevant State and Commonwealth interests; and
 - Details of the community consultation that is to be undertaken before consideration is given to the making of the proposed instrument.

1.1 Proponent and Project Team

The planning proposal has been informed by the following project team and associated reports:

Table 1. Project Team	
Statutory planning	Mecone
Architectural Concept Design Report	Team2 Architects
Urban Design Report	GMU

Table 1. Project Team	
Social and Economic Impact Assessment (SEIA)	Ethos Urban
High Level Clinical Review	Mostyn Copper
Traffic and Parking Report	Varga Traffic Planning
Landscape Strategy	Distinctive

2 Site Information and Context

The site at 445-459 Canterbury Road, Campsie is located in the City of Canterbury Bankstown Local Government Area (LGA). The site area is approximately 4,414m² and currently contains a number of single storey large format retail stores including Happy Furniture and The Stables Bag. Arthur and Troy's Auto Repairs are also located at the site. The site is accessed from Canterbury Road, with a secondary access from Stanley Street. Surface level car parking and yard space is also provided. The site is zoned B6 (Enterprise Corridor).

There is no substantive vegetation or landscaped areas on the site. A number of trees are located within the highway verge fronting Stanley Street.

In terms of local characteristics, the following is noted:

- Located along the main road with very good vehicular access
- 700m from the nearest Public Hospital
- Close proximity to public transport and within 780m of Campsie Station
- Located within walking distance from Campsie Town Centre and commercial/retail facilities
- Surrounded by a number of supporting private medical facilities
- Schools located within 520m
- 700m from an NSW Ambulance Station

The relevance of these factors is explained further in the following sections.

Canterbury Road is two-lanes wide in each direction and approximately 18.5 metres wide including footways, verges and carriageway.

Located to the south are predominantly single storey residential properties with pitched roofs (zone R3), although the area around the site including along Canterbury Road and Beamish Street is undergoing significant redevelopment from commercial, retail and residential uses to mixed use development including five to six storey buildings. This change is demonstrated in the recent development of Campsie Central, located at 420 Canterbury Road, Campsie. The new development is located opposite the site and has recently delivered a mixed use building including new retail areas and five levels of one, two and three bedroom dwellings above. A similar development in terms of use and scale is located to the south-east, at the junction with Messiter Street.

Along Stanley Street to the west and north-west are 2, 3 and 4 storey residential properties. Perry Street runs east-west beyond the north boundary of the Site and mainly 2-storey height commercial and light industrial premises are located along its southern side (backing on to the Site) – also within the B6 zone.

Aerial images depicting the site are provided in **Figures 1 and 2** and highlight the local context of the site.

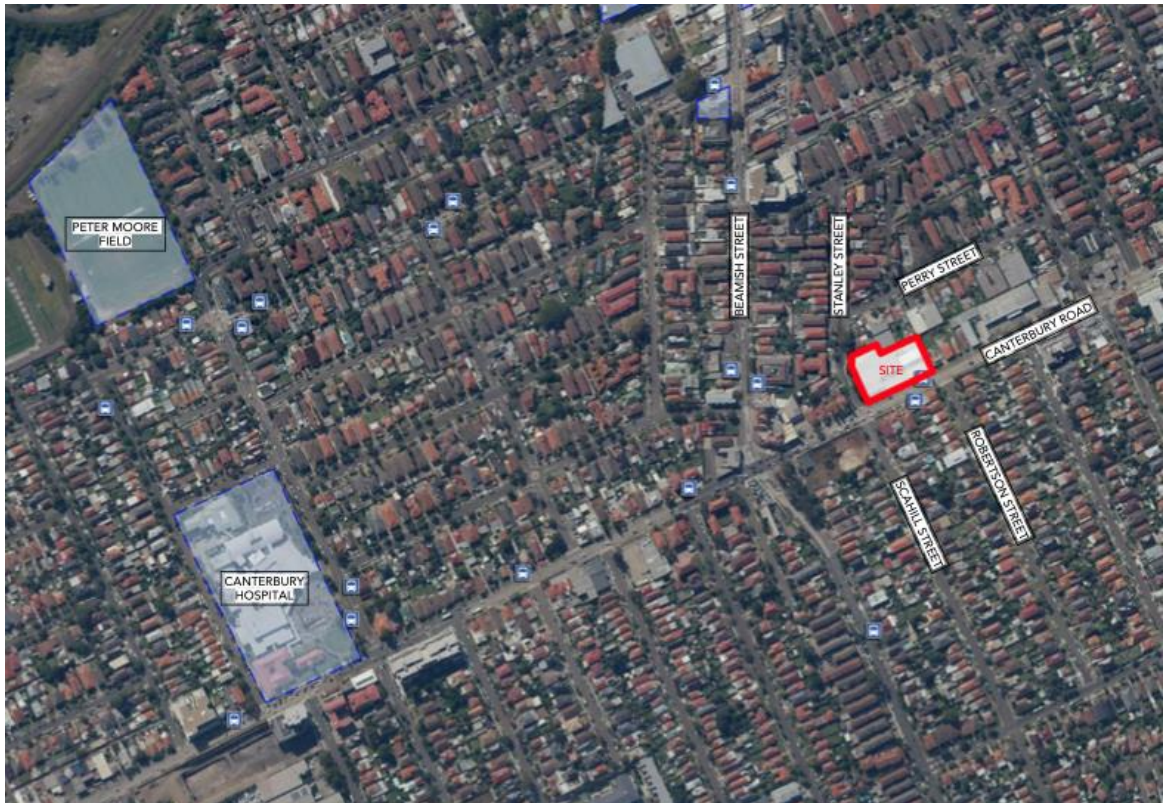


Figure 1. Subject site
 (Source: Mecone Mosaic and Team2 Architects)



Figure 2 Subject site
 (Source: Mecone Mosaic and Team2 Architects)



Figure 3 The site looking north-east between Stanley Street and Canterbury Road
(Source: Team2 Architects and Google Maps)



Figure 4 The site when viewed looking west along Canterbury Road
(Source: Team2 Architects and Google Maps)

It is noted that there are a number of medical facilities located within 500m of the site, with majority of the health centres located at the Campsie Centre – as shown in **Figure 5** below. The Canterbury Hospital is located approximately 700m west of the subject site. However, **Figure 6** below also demonstrates the current critical lack of private hospitals in the Canterbury Bankstown LGA, which reduces patient choice and increases the burden on the public health system.



Figure 5 Local context

(Source: Mecone)

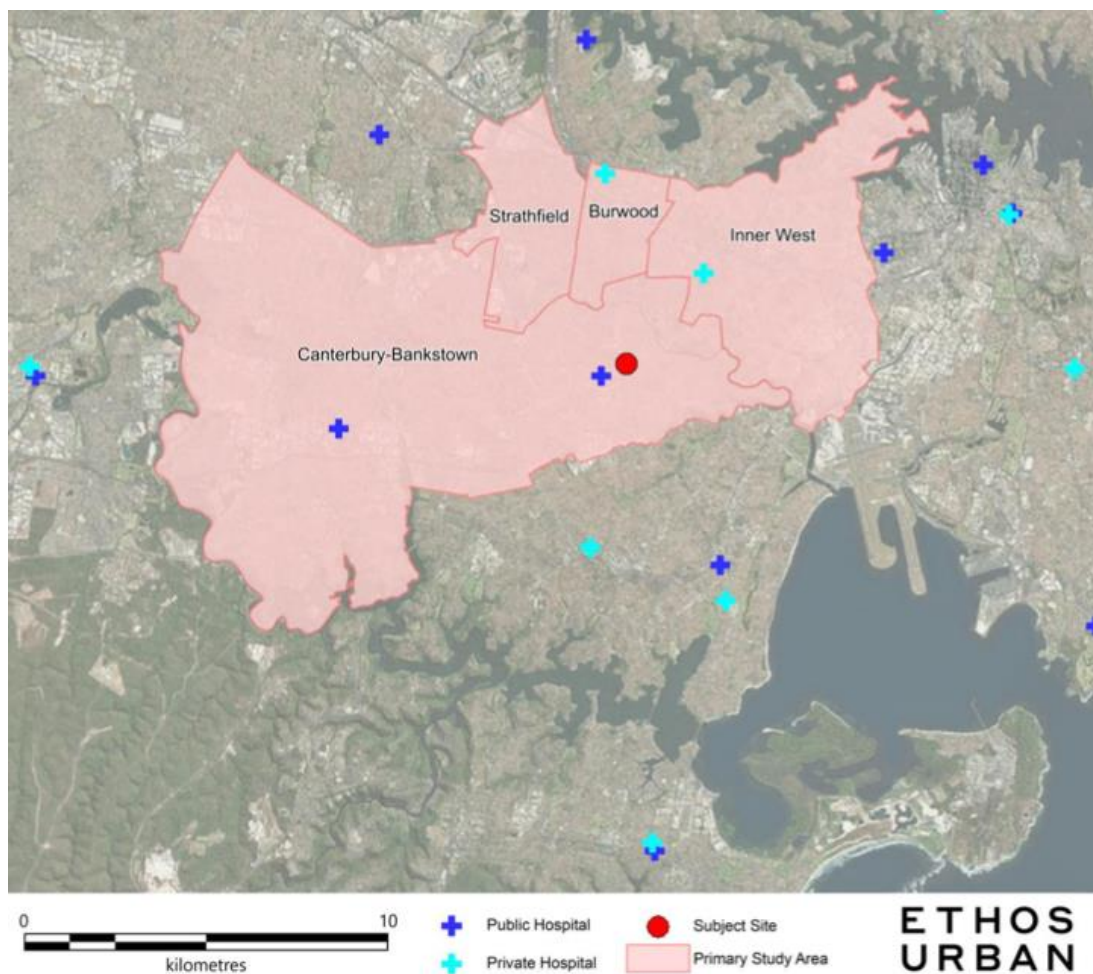


Figure 6 Hospital Provision Map

(Source: Ethos Urban, Social and Economic Impact Assessment)

2.1 Site Description

The table below provides a summary description of the subject site.

Table 2. Site description summary	
Item	Description
Site address	445-459 Canterbury Road, Campsie
Legal description	<ul style="list-style-type: none"> • Lot 3, DP 337683 • Lot A & B, DP 355656 • Lots A & B, DP 416123 • Lot 15, DP 3995 • Lots A & B, DP 391661 • Lot 13, DP 3995
Total area	4,414m ²

Table 2. Site description summary

Item	Description
Zone	The site is zoned B6 Enterprise Corridor .
Frontages	86m on Canterbury Road and 60m on Stanley Street respectively.
Existing use	<p>The site is extensively developed and currently contains single storey large format retail buildings, including Happy Furniture and The Stables Bag, plus Arthur and Troy's Auto Repairs.</p> <p>The site is accessed from Canterbury Road, with a secondary access from Stanley Street. Surface level car parking and yard space is also provided.</p> <p>Prior to the existing uses, the land was occupied by low density housing.</p>
Surrounding development	The surrounding area is characterised generally by low-density residential dwellings and commercial/storage warehouse usage and is transitioning to higher-density development along the Canterbury Road Corridor. A number of larger-scale retail or commercial developments have taken place along the Canterbury Road corridor comprising 4-5 levels of shop-top housing.
Access and Public Transport	The area is well serviced by public transport infrastructure. The site is positioned within 780m south of Campsie Railway Station. Bus route interchanges along Canterbury Road and Beamish Street are within 200m of the site and provide access to Sydney Airport, Martin Place, Macquarie University, and other railway stations including Rockdale and Bondi Junction.
Heritage	There are no heritage items on, or immediately adjacent to the site. The nearest item is located at 485 Canterbury Road (approximately 90 metres to the west) and is described as 'General (Local) - Inter war shop and motor garage, Dan's Corner'
Flooding	The site is not identified within a Flood Planning Area within the Canterbury LEP2012
Landscaping and Biodiversity	The site is largely covered by existing buildings, vehicle parking and hard standing areas. There is little or no vegetation on the site. As a result, there is anticipated to be very limited prospect of any features or habitats of biodiversity value.

2.2 Socio-Economic Characteristics

A Social and Economic Impact Assessment (SEIA) has been prepared by Ethos Urban to inform the demographic data of the Primary Study Area (PSA) in the Canterbury region. This is provided at **Appendix 2**. The PSA is determined as the catchment which the proposed hospital would likely service the most.

High levels of population growth are projected in the PSA, where the population is projected to grow from 634,010 in 2016 to 932,940 by 2041, indicating an annual average growth of a factor of 1.6. Particularly between the period 2006 to 2016, the subject area underwent a significant spike with the number of residents, increasing by around 90,958. As such, this population growth will generate an estimated additional 36,470 hospital admissions within the subject area between 2016 and 2041.

The subject area serves as an appealing location for families choosing to settle, where 71.6% of households are family households. Couples with children are the predominant household type in the Canterbury LGA, comprising 36% of households in 2016.

The LGA also plays host to a significantly multicultural society, with a large percentage of the population born outside of Australia and 55.5% of the population speak a language other than English at home. The most common ancestries in the LGA were Lebanese, Australian, Chinese and Greek, and the top languages spoken at home other than English being Arabic, Greek, Mandarin and Cantonese. While only 0.8% of residents identified as being of Aboriginal and/or Torres Strait Islander descent.

The SEIA report shows that the PSA has a median weekly income lower than the averages in New South Wales and Australia, with 18.5% of households earning less than \$650 per week.

The most common occupations include Professionals, Clerical and Administrative Workers, and Technicians and Trade Workers. The South District Plan identifies a job target in the immediate Campsie Precinct of between 7,000-7,500 jobs by 2036 which amounts to an increase of 2,200-2,700 jobs from the estimated of 4,800 jobs in 2016. The Education, Health Care and Public Services sectors are anticipated to absorb the majority of this growth. These jobs targets are expected to be supported by the development of the hospital, providing direct and indirect employment generated during the construction and operational phases.

The High Level Clinical Review prepared by Mostyn Copper provides a number of further socio-economic characteristics from consultation, published reports and from research, such as 'A Picture of Health – Sydney Local Health District Profile 2015'. The report is provided at **Appendix 3**. A summary of some of the key findings is as follows:

- 39% population increase to 2031
- 33% of Canterbury residents are socially disadvantaged
- High ethnicity – 48% born overseas
- High projected population increase for 65 years+ by 2031
- Campsie ranks 6th in the suburban ranking of disadvantage in the Sydney Local Health District

3 Planning Context

3.1 Strategic Planning Context

Details of the strategic planning context and the consistency of this planning proposal with the objectives of the regional and district plan are provided in the following section.

3.2 Local Planning Context

The relevant local environmental plan related to the subject site is the Canterbury Local Environmental Plan 2012 (CLEP 2012).

Hospital is identified as a type of 'health services facility' under the Standard Instrument and the CLEP 2012. While the current controls do not specifically prescribe 'health services facility' as permissible, it is also not listed as a prohibited use - and is therefore permissible by default. The proposal is compliant with the objectives of the current zone.

Canterbury Local Environmental Plan 2012

The below table provides an overview of the key development standards and planning provisions contained in the CLEP 2012 applicable to the site.

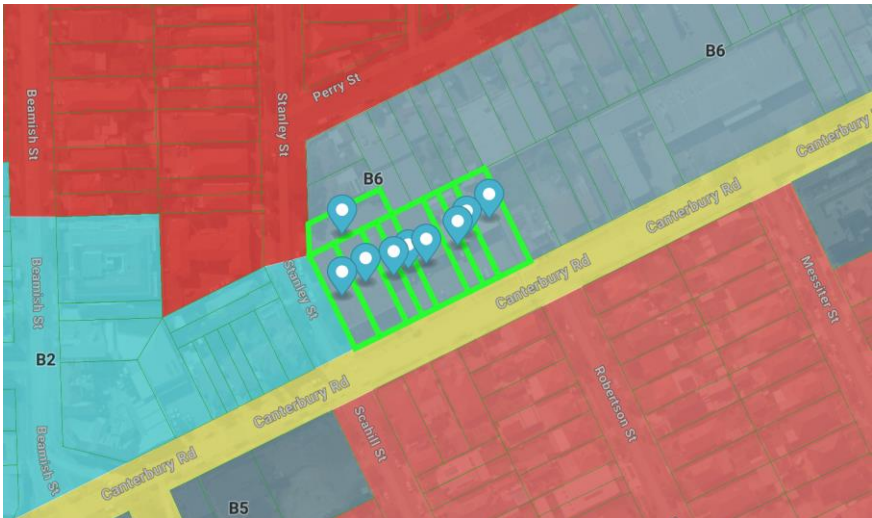

Table 3. CLEP 2012 (Local Centres) Site Overview	
Item	Description
Land use zoning	<p>The subject site and neighbouring land is within the <i>B6 Enterprise Corridor</i>.</p> 
Objectives of B6 Enterprise Corridor	<ul style="list-style-type: none">To promote businesses along main roads and to encourage a mix of compatible uses.

Table 3. CLEP 2012 (Local Centres) Site Overview

	<ul style="list-style-type: none"> • To provide a range of employment uses (including business, office, retail and light industrial uses). • To maintain the economic strength of centres by limiting retailing activity. • To facilitate the revitalisation of Canterbury Road and create an attractive streetscape supported by buildings of a high standard of design. • To support urban renewal and a pattern of land use and density that reflects the existing and future capacity of the transport network.
Permitted without consent (item 2)	Home occupations
Permitted with consent (item 3)	Business premises; Community facilities; Food and drink premises; Garden centres; Hardware and building supplies; Hotel or motel accommodation; Landscaping material supplies; Light industries; Oyster aquaculture; Passenger transport facilities; Plant nurseries; Roads; Tank-based aquaculture; Vehicle sales or hire premises; Warehouse or distribution centres; Any other development not specified in item 2 or 4.
Prohibited (item 4)	Agriculture; Air transport facilities; Airstrips; Amusement centres; Biosolids treatment facilities; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Centre-based child care facilities; Charter and tourism boating facilities; Correctional centres; Crematoria; Eco-tourist facilities; Electricity generating works; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industries; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Places of public worship; Pond-based aquaculture; Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Residential accommodation; Resource recovery facilities; Respite day care centres; Restricted premises; Retail premises; Rural industries; Sewage treatment plants; Sex services premises; Storage premises; Tourist and visitor accommodation; Truck depots; Waste disposal facilities; Water recreation structures; Water recycling facilities; Water supply systems; Wharf or boating facilities

Table 3. CLEP 2012 (Local Centres) Site Overview

Minimum Lot size	No minimum lot size is identified for the site.
Height of buildings	<p>A maximum HOB of 12 metres applies to the site.</p> 
Floor space ratio	No FSR control is identified for the site.

Draft Consolidated Local Environmental Plan

On 11 October 2019 Council resolved to prepare a planning proposal (PP_2019_CBANK_005) which sought to streamline a single set of planning guidelines across the LGA through consolidating Bankstown LEP and Canterbury LEP 2012 into one comprehensive Local Environmental Plan. It is noted that Council resolved to remove itself from the decision-making process in relation to the Draft Consolidated LEP to ensure all conflicts of interest are appropriately managed. The Canterbury Bankstown Local Planning Panel is responsible for making decisions in relation to the Draft Consolidated LEP to ensure a more transparent and accountable determination of the planning proposal.

The Consolidated LEP was endorsed by the Panel and went on exhibition on 6 March 2020 and ended on 22 May 2020. In considering the 500 submissions received, the Planning Panel recommended the adoption of the Draft Consolidated LEP subject to amendments as stipulated in the 'Agenda for the Canterbury Bankstown Local Planning Panel Meeting (30 June 2020) Report'.

It is noted that the Consolidated LEP contains no substantial changes affecting the subject site or proposal objectives.

4 Planning Proposal Overview

Section 3.33 of the EP&A Act 1979 outlines the required contents of a planning proposal. The Department of Planning and Environment *A Guide to Preparing Planning Proposals* (February 2019), breaks these requirements into six parts. These parts are addressed in following subsections of this report as follows:

- Part 1 – A statement of the objectives and intended outcomes of the proposed instrument;
- Part 2 – An explanation of the provisions that are to be included in the proposed instrument;
- Part 3 – The justification for those objectives, outcomes and the process for implementation;
- Part 4 – Mapping where relevant to identify the intent of the planning proposal and the area to which it applies; and
- Part 5 – Details of the community consultation that is to be undertaken on the planning proposal.
- Part 6 – The project timeline

4.1 Part 1- Objectives and intended outcomes

The planning proposal is submitted to amend the Canterbury Local Environmental Plan (CLEP) 2012 to enable a transformative vision for the subject site and facilitate the delivery of important new healthcare and medical facility at 445-459 Canterbury Road as part of the designated Eastern Lifestyle and Medical Precinct.

The aim is to achieve the following objectives and outcomes:

- To provide a site-specific planning framework that enables a new private hospital development consistent with the current zoning for the site. Site specific DCP controls will also be developed in consultation with Council prior to submission for a Gateway Determination;
- Assist in realising the objectives of the Greater Sydney Commission's South District Plan to achieve at least 7,000 jobs in Campsie Strategic Centre by 2036, plus strengthen links to Canterbury Hospital and surrounding allied health services;
- Initiate the delivery of a new health and medical development within the Eastern Lifestyle and Medical Precinct identified in the Canterbury-Bankstown LSPS – Connective City 2036;
- Address the absence of acute or non-acute private hospitals within the Canterbury-Bankstown LGA; and significant shortfall of hospital bed spaces per capita in the Canterbury area (which is approximately only one-third of the national average);
- Assist in achieving the priorities of the Sydney Local Health District Strategic Plan 2018-2023, including to develop, plan and construct new and upgraded health facilities to address significant population growth, increasing demand and ageing infrastructure;

- To enable a scale of built-form which provides the critical mass needed to deliver the range of facilities and functions of a modern private hospital. This will offer critical additional health services to the Local Health District, which is currently under-supplied for these services;
- Through collaboration, create the opportunity for the services envisaged in the concept design to assist the Sydney Local Health District (SLHD) and Canterbury Hospital meet the demand for health services – reducing pressure on waiting lists; and
- Alongside more detailed controls in a site-specific DCP, to manage the likely effects of the proposal in relation to the amenity of neighbouring lower density residential development; in particular located to the south of Canterbury Road.

4.2 Part 2 - Explanation of Provisions

The planning proposal seeks to achieve the intended outcomes above through the following at the subject site:

Amending the LEP Height of Building Map in accordance with the proposed height map, shown at **Appendix 6**, which indicates a maximum permissible height of 56 metres on the site.

Requirement to Prepare a Site-Specific Development Control Plan

The LEP is also to be amended to include a provision that development consent must not be granted for development on land to which this clause applies unless a development control plan that provides for detailed development controls has been prepared.

A Site-Specific Development Control Plan will be prepared in consultation with Council and submitted prior to issue of Gateway and public exhibition of this planning proposal. It will be informed by an assessment of the built form and development controls proposed. An Architectural Concept Design Report prepared by Team2 Architects at **Appendix 4** illustrates the concept, elements and parameters of the design, including building envelope diagrams.

The other appended assessment documents then undertake urban design testing of the proposal and the quantum of development envisaged in the concept design building envelope. This is in context both in terms of existing built form and future potential Eastern Lifestyle and Medical Precinct massing in the B6 block and along Canterbury Road.

4.3 Part 3 – Justification

This section of the planning proposal provides the rationale for the amendments and responds to questions set out in the document *A Guide to Preparing Planning Proposals*.

4.3.1 Section A – Need for the Proposal

Q1. Is the Planning Proposal a result of any strategic study or report?

Yes. The planning proposal has arisen as a result of an identified opportunity to enable the expansion of essential medical services and investment within the Eastern Medical and Lifestyle Precinct. Additionally, this will provide opportunities for the strategic cluster of private and public hospital facilities and allow medical specialists to operate elective surgeries within the vicinity of a public hospital.

The project generates social and economic benefits which align with the broader state and local government strategic and renewal plans for the area.

At state level, the *NSW Health State Plan 2014* recognises an inevitable need for increased provisions of health infrastructure to underpin the evolving health and well-being needs of the broader NSW population. Particularly, the health industry is tasked with key challenges of adapting and improving services for the ageing population. This Plan endorses priority actions that focus on strengthening health services through enhancing existing medical facilities as well as delivering a suite of innovative health infrastructure designed for future needs.

At local level, this has been largely informed by the *Sydney Local Health District (SLHD) Strategic Plan 2018 – 2023* which highlights the need to address increased demand for health service capacity driven by the epidemiological and demographic changes of the Canterbury Bankstown region. The plan forecasts an increase in the number of people with chronic illnesses, with a 28% increase in overnight stays for patients with sub-acute conditions. The Strategic Plan outlines that this quantum of demand cannot be met through clinical re-design and rather, it corresponds to a need for a whole new tertiary hospital in the next decade. Investigations have revealed that there are no acute or sub-acute private hospitals in the subject region, with no private acute facilities servicing the Canterbury Bankstown LGA at all.

As such, anticipated population growth for the region will propel the demand for increased access to elective private medical services. This will be supported by the new Campsie Private Hospital on the subject site. The opportunity to provide an essential health care facility will enable additional medical services, such as inpatient and outpatient services, emergency and intensive care, to be delivered to the wider community as well as simultaneously aiming to complement and reduce the burden of the public health system.

The Executive Director of SLHD has provided a letter of support to the principle of a private hospital at the subject site. The letter is at **Appendix 1** and it recognises the benefits of collaboration between public and private hospitals. It also explains how this proposal could assist Canterbury Hospital in meeting the growing demand for health services.

HPG commissioned Ethos Urban to undertake a Social and Economic Impact Assessment (SEIA) that clarifies the social and economic drivers for the proposed Campsie Private Hospital. In addition, the likely social and economic implications at the local and regional level resulting from the construction and operation of the future health facility. The SEIA is provided at **Appendix 2**. The research study defines the Primary Study Area (PSA) which is determined as the catchment in which the

proposed hospital would likely service needs the most. A Secondary Study Area (SSA) is defined reflecting the Greater Sydney region.

The study identifies the projected growth for both the PSA and SSA in **Table 4** below, with the PSA undergoing a population increase of 298,930 persons between 2016 - 2041.

Table 4. Population Projections Study Area						
Study Area	2016	2021	2026	2031	2036	2041
Primary Study Area	634,010	703,770	773,050	833,420	884,580	932,940
Secondary Study Area	4,688,260	5,252,610	5,746,820	6,211,970	6,661,720	7,103,090

(Source: Department of Planning, Industry and Environment; Ethos Urban)

The study found that population growth will also be driven by an ageing population in the Sydney-Inner South West. Both factors combined are anticipated to place an increased burden on health infrastructure in the region.

Particularly, the SLHD Strategic Plan highlights that the existing Canterbury Hospital has long been experiencing significant demand pressures, leading to a significant expansion of its emergency department.

The PSA anticipates a 47.1% population increase, with forecast growth of 298,930 persons between 2016 and 2041. This will account for a large portion of the estimated admission increases occurring in cohorts aged 65 and over. Moreover, persons aged 75 and over will increase by 131% between 2016 and 2041. Despite this, it is noted that persons aged 25-44 years will contribute the largest portion of admissions over the projected period as they remain the largest age group within the PSA.

The ageing population is outlined in **Table 5** below, demonstrating that cohorts aged 65 years and over will contribute the highest annual growth rates within the PSA.

Table 5. Population Projections by age cohort (Primary Study Area)								
	2016	2021	2026	2031	2036	2041	Avg. annual growth (no.) 2016-36	Avg. annual growth 2016-36
0-4 years	42,661	48,506	53,260	56,425	56,977	57,387	590	1.2%
5-14 years	72,649	79,699	87,854	96,803	101,745	104,556	1280	1.5%
15-19 years	34,708	36,700	41,464	43,472	47,805	50,838	650	1.5%
20-24 years	49,776	50,807	51,686	55,461	57,202	61,295	460	0.8%
25-34 years	115,448	131,891	137,362	135,581	138,141	142,678	1090	0.9%
35-44 years	91,399	103,656	120,172	130,469	131,781	129,548	1530	1.4%
45-54 years	80,062	84,606	91,366	102,461	115,504	123,749	1750	1.8%
55-64 years	64,956	72,787	78,100	82,934	88,531	98,484	1340	1.7%
65-74 years	43,534	50,831	58,248	65,660	70,209	74,747	1250	2.2%
75-84 years	26,354	29,885	36,807	43,862	50,611	57,548	1250	3.2%
85 years+	12,460	14,406	16,729	20,292	26,074	32,113	790	3.9%

(Source: Department of Planning, Industry and Environment; Ethos Urban)

The SEIA demonstrates that additional health infrastructure will be required in the near future to service the growing and ageing population within the Primary Study Area of the Canterbury Bankstown LGA. It also demonstrates that the current region is considered underserved with private hospital facilities and will require additional health facilities to serve population growth and an ageing population in the LGA.

The final configuration of the proposed health facility will be subject to further consultation with hospital operators and the potential service delivery that may be negotiated with NSW Government Health. However, the SEIA has identified that a significant medical facility provided at the site will improve the region's health infrastructure.

Furthermore, no private hospitals were recorded within the Canterbury Bankstown

and Strathfield LGAs – with Strathfield private hospital located within Burwood LGA. As such, residents within the PSA are understood to use hospitals and health facilities outside of the Study Area, including Royal Prince Alfred Hospital and Concord Hospital, and private hospitals in Hurstville, Kogarah and Liverpool.

In addition to the work undertaken by Ethos Urban, the High Level Clinical Review prepared by Mostyn Copper draws together the findings of a number of published reports and studies relating to both the socio-economic profile of Canterbury Bankstown, the needs and shortfalls arising from existing community healthcare and medical provision, the reliance on existing facilities outside the area and the priorities for the future. For example:

- 18.8% of Canterbury resident activity flows to Concord or RPA Hospitals
- 16.8% of activity flows to South-East Sydney Local Health District (SESLHD) or South-West Sydney Local Health District (SWSLHD)

The importance of collaborative relationships between Canterbury hospital, other SLHD facilities and private medical facilities is underlined. The High Level Clinical Review is at **Appendix 3**

Table 6 below indicates that the PSA would account for a substantial undersupply of hospital beds given the supply provision is around 66% below the national average.

It demonstrates that up to an additional 2,660 beds will be required within the PSA by 2036, in order to accommodate for the undersupply in hospital beds relative to the national average. This estimate is framed on the current delivery of beds within the PSA (820) and the forecast delivery of the national average in 2036 (3,450).

Table 6. Hospital bed provisions gap			
	2016	2026	2036
Population	634,010	773,050	884,580
Primary Study Area Catchment average (1.3 beds per 1,000 population)	820	1,000	1,150
National average (3.9 beds per 1,000 population)	2,470	3,010	3,450
Gap in beds	1,650	2,010	2,300

(Source: Australian Institute of Health and Welfare; Australia's Health 2018; Ethos Urban)

Q2. Is the Planning Proposal the best means of achieving the objectives and outcomes, or is there a better way?

Yes - a planning proposal is the best means of facilitating the objectives and outcomes identified in this report. The current development controls are not able to facilitate the redevelopment of the subject site in a way which can provide for the strategic needs of a modern private hospital and the critical mass of services, facilities and accommodation required by such hospitals. While it would be possible for the required changes to the controls to be contemplated through a comprehensive LEP review, this is considered to be a less desirable method as it would not allow detailed site mitigation of effects or consideration of public benefits alongside the changes to planning controls.

A planning proposal and associated site-specific DCP will allow for the redevelopment of the site to be contemplated in detail and as a collective whole. It is suggested that this level of detail would not be contemplated in a LEP or area/corridor wide planning proposal and therefore would result in a poorer outcome, as well as unnecessarily extended project timeframes.

Of the alternatives, the planning proposal approach is the optimum pathway.

4.3.1 Section B – Relationship to strategic planning framework

Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

Yes. The relevant directions, planning priorities and actions of the Greater Sydney Region Plan, 2018 and Greater Sydney Commission's South District Plan have been considered in the making of the planning proposal. The relevant plans and strategies applicable to the subject site are further addressed under the headings below.

Greater Sydney Region Plan, 2018

The Greater Sydney Region Plan (2018) (Region Plan) forms Sydney's overarching metropolitan strategic plan. The Region Plan builds on the three cities vision introduced by Towards our Greater Sydney 2056 (2017). The vision for the region is to transform into a metropolis of three cities; Western Parkland City, Central River City and Eastern Harbour City. The subject site is located within the southern portion of the Eastern Harbour CBD City, with Campsie identified as a planned zone along the Sydenham to Bankstown Urban Renewal Corridor.

The Region Plan is structured around four key themes—infrastructure and collaboration, liveability, productivity and sustainability—and sets out a number of directions and objectives to guide delivery of these themes. The planning proposal is considered to be consistent with all of relevant strategic planning priorities outlined in the Greater Sydney Region Plan. The proposal will enable the redevelopment of the area into an integrated health precinct, enhancing productivity, liveability and sustainability opportunities through supporting a 30-minute city with greater accessibility to jobs, essential medical services, open space and roads.

South District Plan, 2018

Campsie is identified as a Strategic Centre within the Greater Sydney Commission's *South District Plan*, with a total 4,800 jobs in 2016 anticipated to increase to at least 7,000 by 2036.

Actions within the South District Plan relating to Campsie include strengthening Campsie through approaches that:

- reinforce Beamish Street's role as an eat street to grow the night-time economy;
- encourage activation of secondary streets;
- strengthen links to Canterbury Hospital and surrounding allied health services;
- manage traffic and parking to reduce impacts on pedestrian amenity, especially on Beamish Street; and
- improve the appearance of the existing rail (freight) corridor.

The site provides an important opportunity to provide new and diverse medical facilities in Campsie and catalyse the delivery of high knowledge and skilled jobs in Canterbury Bankstown, plus the urban renewal of Canterbury Road. This aligns with the goals of the South District Plan by providing an important link between Campsie Town Centre and Canterbury Hospital, plus supporting jobs growth in Campsie Strategic Centre.

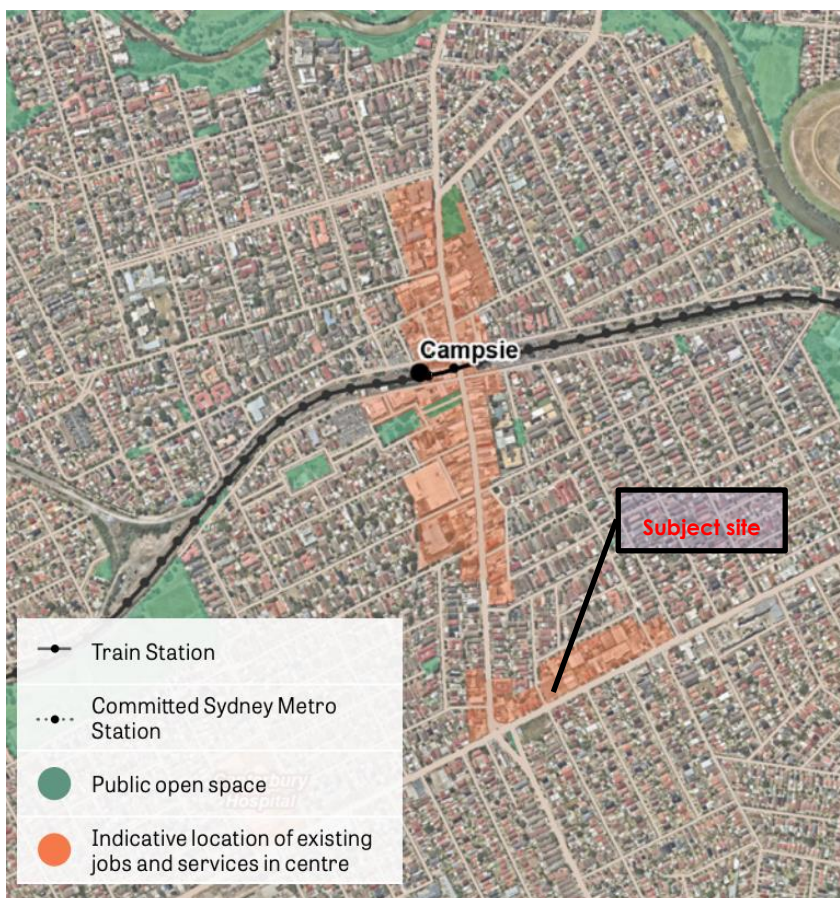


Figure 7 Campsie Strategic Centre Boundaries

(Source: South District Plan, GSC)

Furthermore, the table below outlines how the proposal demonstrates consistency with the key objectives of the relevant Planning Priorities identified within the South District Plan.

Table 7. GSC South District Plan Assessment	
Action	Response of the Planning Proposal
Planning Priority S3 – Providing services and social infrastructure to meet people's changing needs	
Deliver social infrastructure that reflects the needs of the community now and the future communities' changing needs.	The proposed private hospital provides an opportunity for new and expanded medical services ancillary to and complementing those at the existing Canterbury Hospital. This will provide social infrastructure supportive of the future communities' changing needs as well as progress the strategic direction of the developing Eastern Medical and Lifestyle Precinct (EMLP) in Campsie.
Planning Priority S4 – Fostering healthy, creative, culturally rich and socially connected communities	
Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by co-locating schools, health, aged care, sporting, and cultural facilities	The redevelopment of the site will facilitate a more activated local precinct, creating opportunities for enhanced social connections through improving local amenity. The co-location of public and private hospital services will support the changing needs of the growing community. This is especially as the local area currently experiences demand for health care provision in aged health, paediatric care and specialists for community members with Non-English speaking backgrounds.
Planning Priority S6 – Creating and renewing great places and local centres, and respecting the District's heritage	
Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places by integrating social infrastructure to support social connections and provide a community hub	<p>The proposal will ensure place-based and collaborative planning is undertaken to create the conditions for a vibrant, inclusive and well-connected medical community hub. Environmentally and culturally sensitive design will be ensured on the site and reflect community values, sense of place and identity of the local area.</p> <p>Overall, the redevelopment of the site will provide opportunities for a more cohesive community,</p>

	especially for health practitioners currently operating in the local area.
Planning Priority S9 – Growing investment, business opportunities and jobs in strategic centres	
<p>Provide access to jobs, goods and services in centres by:</p> <ul style="list-style-type: none"> a. attracting significant investment and business activity in strategic centres to provide jobs growth b. diversifying the range of activities in all centres c. creating vibrant, safe places and a quality public realm 	<p>The proposed development will reinforce Campsie as a key strategic commercial centre; providing a high degree of amenity, housing and employment for the surrounding areas. The new hospital and its location within the EMPL cluster will stimulate investment in the local property market through driving demand for health services and accommodation.</p> <p>Particularly, the opportunity for collaboration between the new private hospital and existing public hospital will enhance patient choice by providing a more diverse range of medical services and greater convenience through resource sharing.</p> <p>This would also increase the viability of teaching services to attract top quality medical practitioners and specialists.</p> <p>The intention of the scheme will be to closely integrate public space and landscape planting within and around the edges of the site – to provide benefit to users of the development, the surrounding community and enhance the public realm of this section of Canterbury Road.</p>

Sydenham to Bankstown Urban Renewal Strategy, 2017

The Sydenham to Bankstown Urban Renewal Strategy builds on the Sydney Metro City and Southwest project and outlines a plan to integrate infrastructure and housing development across the corridor. Campsie was also identified by the Department of Planning and Environment as a 'Planned Precinct' in mid-2017. This was in response to the planned amenity and accessibility improvements that would be delivered to the area in association with the Sydney Metro Southwest project and the Sydenham to Bankstown Corridor Strategy.

In November 2019, The Department of Planning Industry and Environment announced a new approach to precinct planning to provide certainty for precincts and putting greater responsibility for planning in the hands of councils and local communities. The Sydenham to Bankstown Corridor, which includes Campsie, was designated as a State-led strategic planning precinct where early investigations and high-level strategic planning work would be led by the Department, in collaboration with Councils and state agencies, to inform future rezoning processes.

Q4. Will the planning proposal give effect to a council's endorsed local strategic planning statement, or another endorsed local strategy or strategic plan?

Yes. The relationship between the planning proposal and applicable local plans and strategies has been considered in relation to whether the planning proposal has strategic merit. The planning proposal will give effect to the LSPS and other endorsed strategies and plans as follows.

Local Strategic Planning Statement, Connective City 2036 (LSPS)

The adopted LSPS aims to bring together and build upon the planning work found in a range of Council's studies, strategies and plans. It aligns with the Greater Sydney Region Plan: A Metropolis of Three Cities and The South District Plan and sets out planning priorities and actions to 2036.

The LSPS nominates five Metropolitan Directions and five City Directions to direct growth and renewal where Council can build on current strengths and proactively respond to opportunities. The five City Directions focus on:

1. Chapel Road Precinct, Connective City's heart – from Chullora to Bankstown;
2. Eastern Lifestyle and Medical Precinct – Campsie to Kingsgrove;
3. Bankstown Aviation and Technology Precinct;
4. 34 centres and their surrounding suburbs; and
5. Canterbury-Bankstown's river systems and tributaries.

The site is located within the Campsie Strategic Centre and the broader Eastern Lifestyle and Medical Precinct – Campsie to Kingsgrove (Refer to **Figure 8** below). The Precinct's evolution is to capitalise on the hospital and expand medical support uses. The plan also outlines that areas between Canterbury Road, Kingsgrove Road and Beamish Street will be an urban boulevard and medical destination.

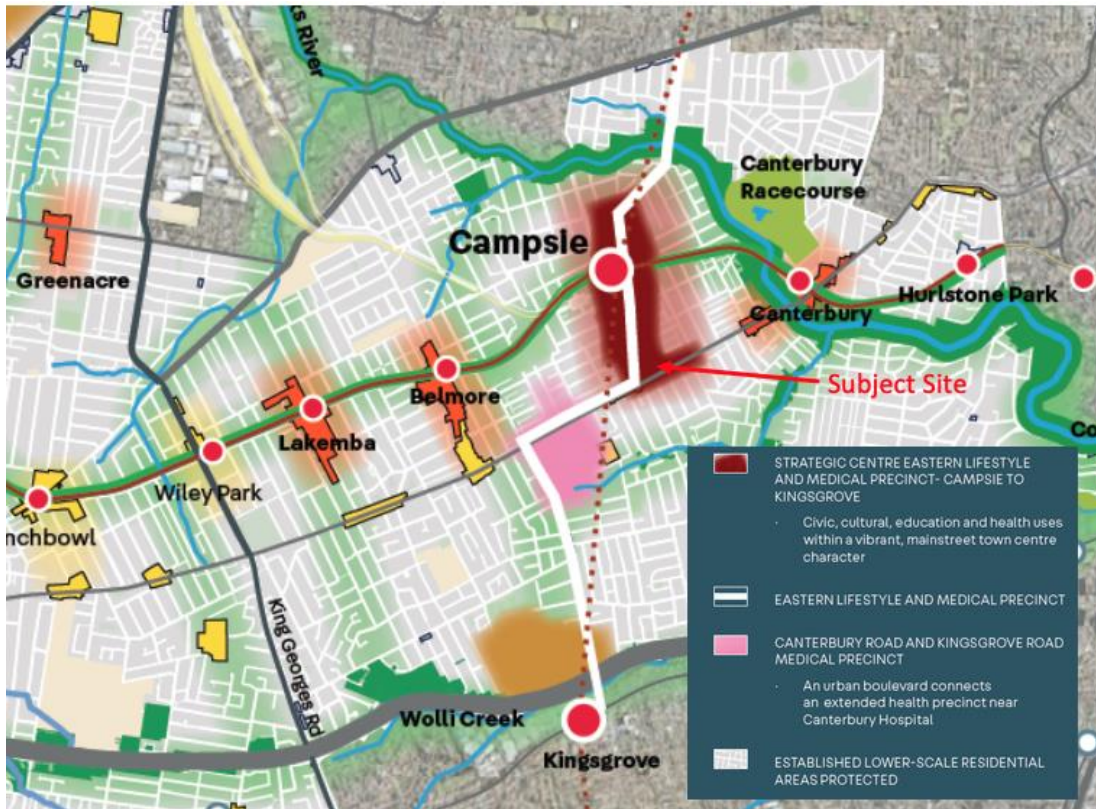


Figure 8 One Plan for Connective City 2036

(Source: Connective City 2036)

The LSPS aims to build an extended medical precinct in this area, leveraging Canterbury Hospital, supporting medical services and encouraging the agglomeration of medical facilities and industries.

The intention is for the subject site to provide a new private hospital in a key location in the Eastern Lifestyle and Medical Precinct, supporting the establishment and growth of the medical precinct and providing an important link between Canterbury Hospital and Campsie Town Centre. While it is noted that the LSPS states “*Council owned land could be used as a catalyst for change in Campsie, featuring new community and cultural uses, with expanded open space*”, the subject site offers an opportunity that will strongly align with the Council’s vision and act as a catalyst for positive and transformative change in Campsie.

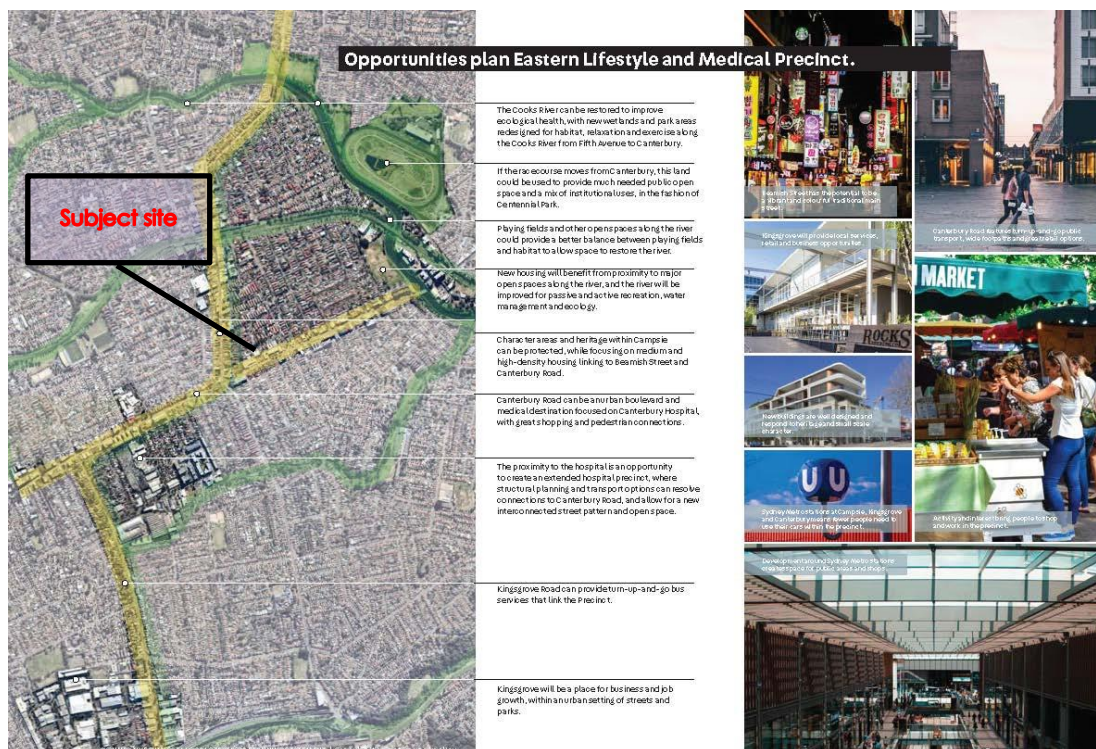


Figure 9 Site located within the Eastern Lifestyle and Medical Precinct

(Source Connective City 2036)

The LSPS outlines 10 evolutions that will shape and deliver *Connective City 2036*. The 10 Evolutions are aspirational and move beyond addressing backlogs to identify the kind of city-shaping and community-serving infrastructure Canterbury Bankstown LGA requires. Given this, a review of the LSPS and how the subject site's redevelopment will respond to its key evolutions, actions and proprieties has been addressed in the table below.

Furthermore, the table below demonstrates that the proposal will give direct effect to many of the planning priorities and actions identified within the LSPS.

Table 8. LSPS – Connective City 2036 Assessment	
Action	Response of the Planning Proposal
Evolution 3 – Places for Commerce and Jobs	
<i>Provide capacity for 7,500 jobs in Campsie Town Centre by 2036</i>	<p>The site is strategically located in the heart of the evolving Eastern Lifestyle and Medical Precinct – Campsie to Kingsgrove and will provide a modern health facility that meets the community's health needs and supports the growth of high knowledge jobs. This would support Council's goal to grow jobs in the Campsie strategic centre from 4,800 in 2016 to 7,500 by 2036, supporting the agglomeration of medical services around Canterbury Hospital.</p> <p>The proposal would support the growth of the Health Care and Social Assistance industry by</p>

Table 8. LSPS – Connective City 2036 Assessment

	<p>providing a modern non-acute private hospital which will provide a range of high-quality medical care. It would complement Canterbury Hospital by providing a new facility for consultants to carry out elective procedures close to Canterbury Hospital. This is important as it supports and retains high knowledge jobs in the LGA and ensures the area remains an attractive place for elective surgery and attracts a greater diversity of employment opportunities.</p>
<p><i>Plan for a health precinct anchored by Canterbury Hospital in Campsie</i></p>	<p>The proposal would support Campsie town centre's growing identity as a strategic centre and specialist medical and lifestyle precinct. It would complement Canterbury Hospital and provide new and diverse health care services to meet the growing needs of the community. It would also enhance the section of townscape on Canterbury Road close to the Beamish Street and Canterbury Road intersection; a key gateway site to the Canterbury Road urban boulevard and medical destination.</p> <p>The proposal would provide a strong eastern counterpoint to Canterbury Hospital, supporting the identity as a health precinct and creating a catalyst to the agglomeration of medical uses east towards Canterbury.</p>
<p>Evolution 6 – Urban and Suburban Places, Housing the City</p>	
<p><i>Prioritise Campsie (Strategic Centre) through a place planning and master planning</i></p>	<p>Development of the site would provide a higher order land use near the intersection of Beamish Street and Canterbury Road, which was been identified as a growth junction in Council's Canterbury Road Review. This would provide impetus to Council's Place Plan for Campsie and the development of Canterbury Road, supporting its renewal from retail and industrial to higher order mixed use through a high-quality design and public domain improvements.</p> <p>The LSPS identifies medical services and specialist uses as key attractors to Campsie, and the proposal would help increase the level of pedestrian and commercial activity in the Canterbury Road and Beamish Street retail areas. The site is easily accessed from the future Campsie Metro Station,</p>

Table 8. LSPS – Connective City 2036 Assessment

	<p>and would also be supported by increased public transport options along Canterbury Road.</p> <p>A high-quality medical care facility supports Campsie's growing identity as a destination, supporting population growth and planned housing uplift in the area. It will provide an activated ground floor with new retail and other commercial uses, enhanced pedestrian links to and through the site, new green space and improved public amenity to signal the Eastern Lifestyle and Medical Precinct.</p>
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CBCity 2028 – Community Strategic Plan

CBCity 2028 is a 10-year blueprint to shape the Canterbury Bankstown area into a thriving, dynamic city. The Plan has been developed in consultation with over 10,000 community members to form the aspirational vision of what they want the city to look like over 10 years. The Plan outlines the 7 *destinations* to lead Canterbury-Bankstown to 2028:

- Safe and Strong
- Clean and Green
- Prosperous and Innovative
- Moving and Integrated
- Healthy and Active
- Liveable and Distinctive
- Leading and Engaged

The planning proposal offers a high-quality medical care development which reflects the objectives of the community strategic vision, ensuring a prosperous and innovative city that is healthy and active. The new facility will promote long term economic and employment growth through supporting a step-change in the realisation of the Lifestyle and Medical Precinct in Campsie by providing opportunities for new jobs and the growing medical industry and ancillary services in the region. This would unlock jobs and create opportunities to upskill local residents in the Health Care and Social Assistance industry; helping workers transition from the declining manufacturing industry and supporting crucial jobs in the Health Care and Social Assistance industry in Canterbury Bankstown.

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

Yes. The planning proposal would address and/or be consistent with all relevant State Environmental Planning Policies (SEPPs). Consideration of relevant SEPPs is provided below in the table.

Table 9. State Environmental Planning Policies

SEPP	Consistency	Comments
SEPP No.1 – Development Standards	Consistent	The proposal does not contradict or hinder the application of the SEPP.
SEPP No. 19 – Bushland in Urban Areas	Not Applicable.	
SEPP No 21 – Caravan Parks	Not Applicable.	
SEPP No. 33 – Hazardous and Offensive Development	Not Applicable.	
SEPP No. 36 – Manufactured Home Estates	Not Applicable.	
SEPP No. 50 – Canal Estate Development	Not Applicable.	
SEPP No. 55 – Remediation of Land	Consistent.	There are potential areas where contamination may have occurred on site. Remediation of land will be undertaken during DA stages of future development to ensure the land is suitable for the intended use.
SEPP No. 64 – Advertising and Signage	Not Applicable.	
SEPP No. 65 – Design Quality of Residential Apartment Development	Not Applicable.	
SEPP No. 70 – Affordable Housing (Revised Schemes)	Not Applicable.	
SEPP (Affordable Rental Housing) 2009	Not Applicable.	
SEPP (Building Sustainability Index: BASIX) 2004	Not Applicable.	
SEPP (Vegetation in Non-rural Areas) 2017	Not Applicable.	
SEPP (Concurrence – Land Application) 2018	Not Applicable.	

Table 9. State Environmental Planning Policies		
SEPP	Consistency	Comments
SEPP (Education Establishments and Child Care Facilities) 2017	Not Applicable.	
SEPP (Exempt and Complying Development Codes 2008	Not Applicable.	
SEPP (Housing for Seniors or People with a Disability) 2004	Not Applicable.	
SEPP (Infrastructure) 2007	Consistent.	The proposal does not contradict or hinder the application of the SEPP.
SEPP (Mining, Petroleum Production and Extractive Industries)	Not Applicable.	
SEPP (Miscellaneous Consent Provisions) 2007	Not Applicable.	
SEPP (Primary Production and Rural Development (2019)	Not Applicable.	
SEPP (State and Regional Development) 2011	Consistent.	As the proposal is defined as hospital under the State Environmental Planning Policy (SEPP) (State and Regional Development) and will have a capital investment value of more than \$30 million, the proposal is designated as State Significant Development and the consent authority is the Independent Planning Commission as stipulated by Clause 8 and 8A of the SEPP (State and Regional Development).

Q6. Is the planning proposal consistent with applicable Ministerial Directions under 9.1 of the Act (previously referred to as s117 directions)?

Yes. The planning proposal is consistent with all relevant Section 9.1 Directions. The assessment of these is outlined in the table below.

Table 10. Section 9.1 Ministerial Directions

Clause	Direction	Consistent	Comments
1. Employment and Resources			
1.2	Rural Zones	Not applicable.	
1.5	Rural Lands	Not applicable.	
2. Environment and Heritage			
2.1	Environmental Protection Zones	Not applicable.	
2.3	Heritage Conservation	Not applicable.	
3. Housing, Infrastructure and Urban Development			
3.1	Residential Zones	Not Applicable.	
3.4	Integrating Land Use and Transport	Consistent.	The proposal will enhance access to jobs, housing and services through connections to existing walking paths, bus and train services. The increased density will strengthen the viability of existing public transport services in the area.
4. Hazard and Risk			
4.1	Acid Sulfate Soils	Consistent.	The Canterbury LEP 2012 contains acid sulfate soil provisions and this proposal does not seek to amend them. Acid sulfate soils investigations and analysis will accordingly be undertaken as part of any future development of the land if required.
4.4	Planning for Bushfire Protection	Not applicable.	
5. Regional Planning			
5.10	Implementation of Regional Plans	Not applicable.	
Local Plan Making			
6.1	Approval and Referral Requirements	Consistent.	The proposal does not include consultation, referral or concurrence provisions, nor clarifies any development as designated development.
6.2	Reserving Land for Public Purposes	Consistent.	The proposal does not contain any land that has been reserved for a public

Table 10. Section 9.1 Ministerial Directions			
Clause	Direction	Consistent	Comments
			purpose and no requests have been made to reserve such land.

4.3.2 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, will be adversely affected as a result of the proposal?

The planning proposal is unlikely to adversely affect any critical habitat or threatened species, populations or ecological communities or their habitats. The subject site is a developed site located in an urbanised area and does not contain any known critical habitats or threatened species, populations or ecological communities.

Q8. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

The changes to the maximum building height control will provide a building envelope capable of delivering a new modern private hospital with efficient layout and floorplates. A number of design principles have been adopted and can be built into site-specific DCP controls to ensure a reasonable balance is achieved between environmental effects arising from a taller, narrower building form to meet the services, facilities and space requirements of a new private hospital, whilst creating much needed open space and the multiple benefits of a rear laneway.

Building Height and Massing Option Testing – To meet strategic objectives

The control sought to be amended by this planning proposal is the building height. Unlike office developments, hotels, residential and retail developments (where numbers of hotel rooms, residential units or desk spaces can be adjusted fairly easily), hospitals are different. They comprise a series of closely interrelated component parts which are scaled to provide for the catchment they are intended to serve and other related facilities which exist or are needed in that area.

Team2 Architects have considerable experience in healthcare planning and design. Although the only planning control to be changed is height, a significant amount of work and analysis has been undertaken by Team2, with the proponent, Mostyn Copper and also GMU to determine the facilities and services required by a modern private hospital – to determine necessary built envelope. A High Level Clinical Review has been prepared by Mostyn Copper to further consider the current shortfalls in medical services in the catchment and relationship between the component parts expected to be needed for a modern hospital in this location. Several case studies have also been reviewed (see pages 9-11 of the Concept Design report prepared by Team2 Architects at **Appendix 4**). The physical space-planning (floorspace) requirements of each of the components has then been considered and the

appropriate positioning of these components relative to each other within a building envelope also determined.

Viability is also relevant – i.e. current versus future use values needed to make redevelopment for a new hospital viable at this location. Hospitals do not generate commercial value in the same way as offices, retail or industrial buildings. Unless the scale of development is expected to be financially sustainable there is no commercial incentive for a private hospital to be developed.

Review of other recent hospital case studies in and around Sydney demonstrates that vertical arrangement of components, linked by lifts, leads to efficient floorplates and ease of movement between those components (compared to networks of long corridors between horizontally arranged buildings). There is also greater scope to expand or reconfigure uses/services internally. Narrower vertically arranged floorplates also lead to a higher level of internal amenity, for example in terms of natural light and views out, with the opportunity for more amenity space around the building for trees and landscaping. This has associated health and well-being benefits to patients, visitors and people working in the building.

On the subject site, two arrangements have been tested by Team2 for how the facilities and services could be accommodated. Please refer page 12 of the Concept Design report at **Appendix 4**. These arrangements are shown in the figure below.

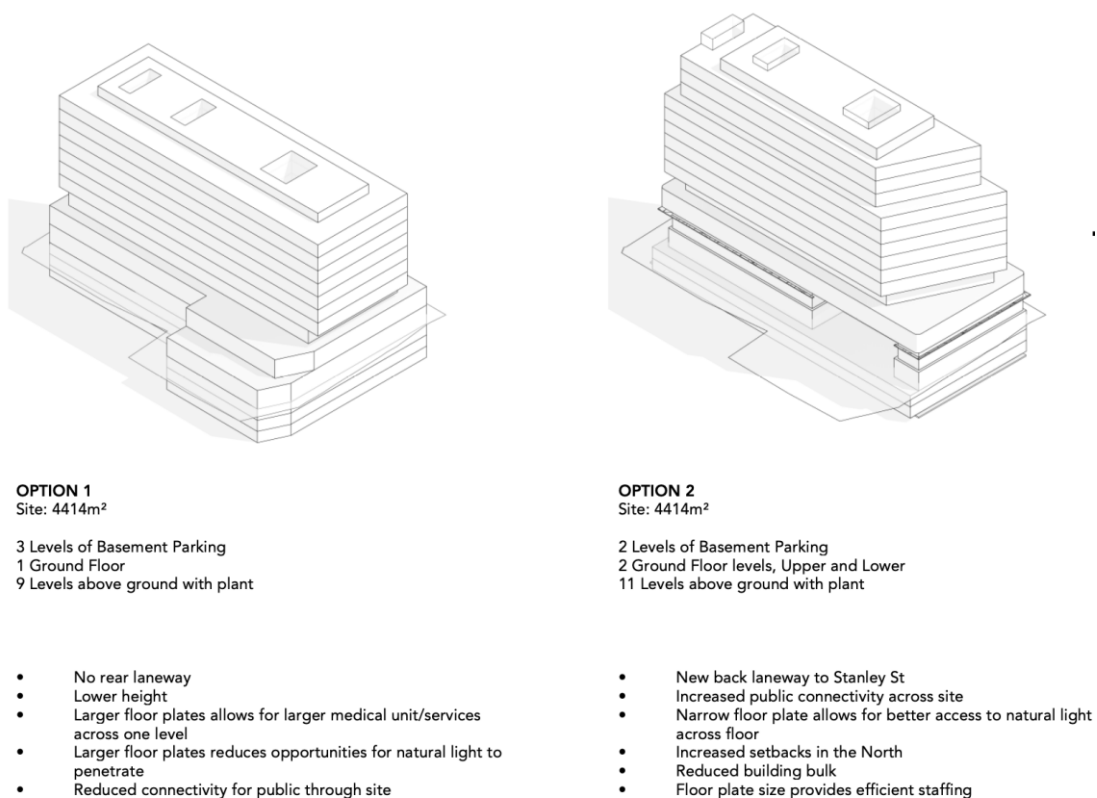


Figure 10 Design and massing options for 445-459 Canterbury Road

(Source: Team2Architects, Concept Design Report, page 12)

Although Option 2 is the slightly taller of the two, there are notable advantages to Option 2 over Option 1 – as summarised above and expanded in the Team2 text box below. This includes the ability to create a laneway to the rear of the building to

facilitate safe access and also deliveries to the rear of the building. This avoids the need to provide an access into the site from Canterbury Road. Existing Canterbury Road vehicular access points into the site can therefore be removed. In addition, there is the opportunity for this laneway to connect through to adjacent sites to the east as they are redeveloped. The opportunity for meaningful outdoor green space and deep soil to support tree planting to contribute positively to the character and appearance of the development and wider area is also created – as shown below.

FORM:

Integrating elements from precedent studies:

Floor plate – A narrow floorplate promotes spatial efficiency as the width is determined by spaces required within (theatres, ward rooms, etc.) rather than maximising footprint to site resulting in odd forms and awkward leftover spaces.

It also allows for natural light to penetrate throughout the building, helping to improve mood and healing, and creates a better working environment for staff.

While consolidating services the narrower floorplate and vertical transportation also reduces travel distance for sick patients and tired staff avoiding having to trek vast campuses.

It allows for new laneway on the site and maximising green spaces for public/neighbours' amenity, and the sky gardens cut into the facade provide healing spaces for patients, visitors and staff as well as calming visual points of interest for the public and neighbours.

Height – Opportunity for iconic building in the area – establishing as a prominent marker point for the area as a gateway building to new medical precinct in Campsie

Wayfinding – Signage and wayfinding is very important and the entry double height space on the ground levels provides a visual connection through the building and a simple narrow and consolidated floorplate and layout adds to ease of navigation.

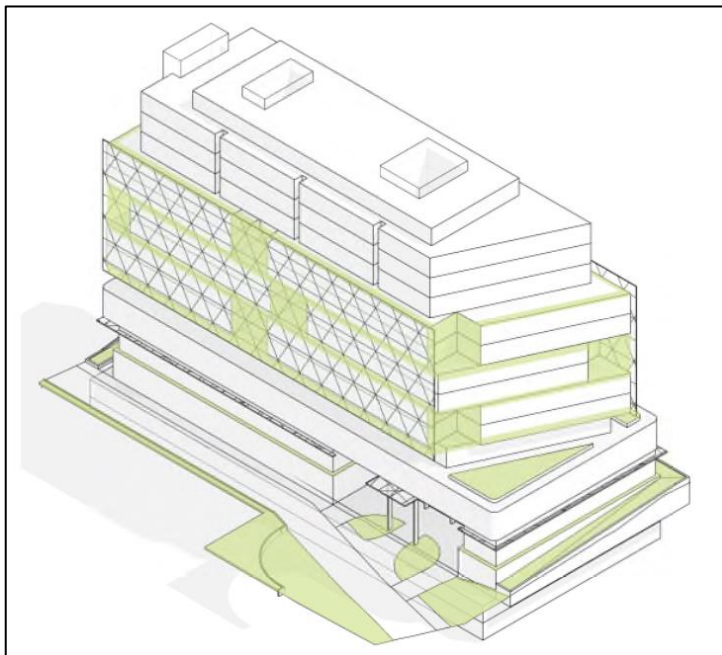


Figure 11 Preferred massing option and merits for 445-459 Canterbury Road

(Source: Team2Architects, Concept Design Report, page 12)

In summary, the benefits of a taller, narrower built form enables the site to offer:

- provision of a rear laneway off Stanley Street to provide vehicular and servicing access to the site (enabling access existing points off Canterbury Road to be closed)
- the laneway will provide the opportunity for a future connection linking through other sites in the block, (potentially to Una Street). This will provide options for vehicle access connections and increase permeability of the block, alleviating traffic constraints around Canterbury Road;
- the creation of new green public open space as an important community benefit in an area of deficiency, plus amenity space for patients, visitors and workers in the new hospital;
- increased setbacks and separation to properties to the north of the site;
- enhanced natural lighting being available into the new building, to improve the internal environment and reduce reliance on artificial lighting;
- greater scope for internal flexibility and expansion of uses/services; and
- a deep soil area within the site to support new tree planting in areas where there are very few trees – with the potential to extend to a larger pocket park at an adjacent site in the future.

The preferred massing option shown above has informed the proposed new height control for the subject site – and sought through this planning proposal.

An indicative landscape strategy has been prepared for the design concept by Distinctive, as shown below. This illustrates how the current hard built form of the site could be transformed to create meaningful areas of green outdoor space – to the benefit of the community as well as users of the building. This is extendable to the north to enhance the benefits further. Further illustrative details are provided in the Landscape Strategy at **Appendix 7**.



Figure 12 Concept landscape masterplan design for the subject site.

(Source: Distinctive)

Evolution of the ELMP

The massing studies and proposed height control for the subject site should not be seen in isolation or the merits judged through the *existing* character, use and scale of development along this section of the Canterbury Road corridor. The corridor is changing and the site is strategically located in the heart of the emerging Eastern Lifestyle and Medical Precinct – Campsie to Kingsgrove. The Greater Sydney Commission's South District Plan seeks to support growth in employment to at least 7,000 jobs in Campsie Strategic Centre by 2036. However, these strategic objectives cannot be achieved through retaining current built form.

Whilst this planning proposal relates only to 445-459 Canterbury Road, the potential of the B6 block in which the subject site is located and the wider Canterbury Road corridor to evolve physically to enable the realisation of the Eastern Lifestyle and Medical Precinct has been considered by GMU, as shown in its assessment report in **Appendix 5**. Extracts showing how building heights and an urban design masterplan could evolve are provided in the figures below:

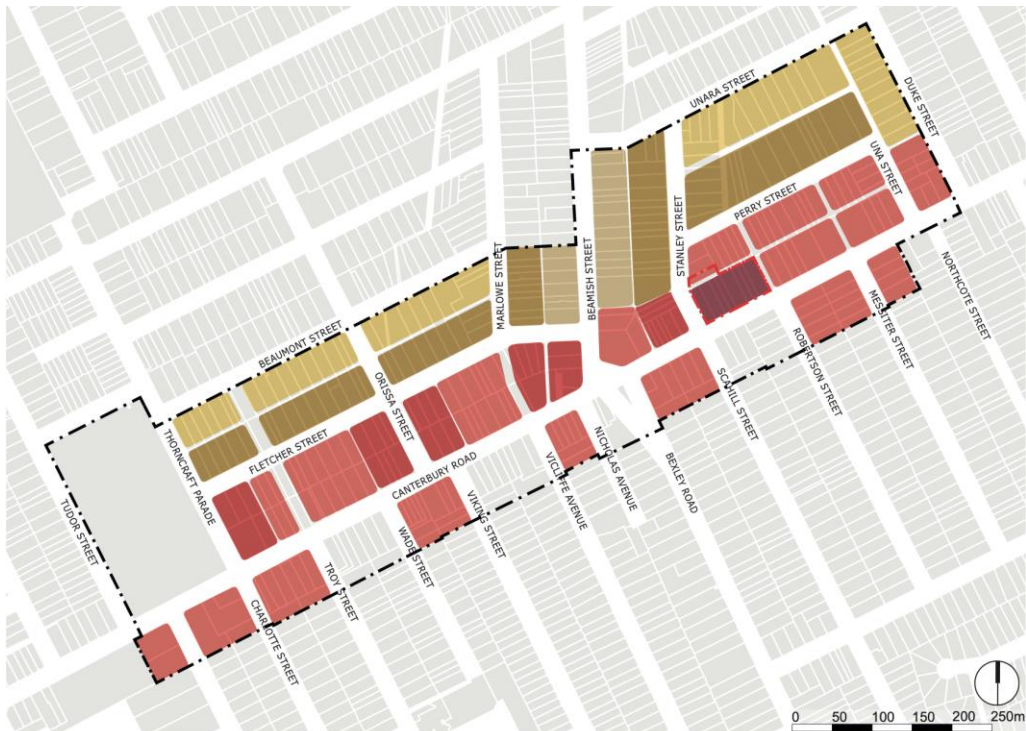


Figure 59. Potential height of building

KEY

 Subject Site	 14m	 21m	 40m (Key sites)
 Study area boundary	 18m	 30m	 56m (Private hospital)

Figure 13 Potential urban design structure plan for the portion of the Eastern Lifestyle and Medical Precinct along Canterbury Road

(Source: Urban Design Report, Figure 59, GMU)



Figure 74. Potential building heights

KEY

 Subject Site	↔ Laneway	 Potential 8 storeys	 No. of storeys
 Block boundary	↔ Pedestrian network	 Proposed 12 storeys	

Figure 14 Potential building heights and mid-block connections for the B6 block in which the subject site is located

(Source: Urban Design Report, Figure 74, GMU)

The GMU assessment shows how changes to controls along the corridor could enable development to deliver a wide range of complementary and specialist facilities which support the function and operation of hospitals.

The employment benefits of 'anchor institutions' such as hospitals, their stimulus to local economies and their attractiveness to supporting businesses and services are recognised in the Canterbury Bankstown – Draft Employment Lands Strategy (February 2020), used to inform the Draft Consolidated Local Environmental Plan.

At paragraph 3.4.2 it states as follows:

3.4.2 New and changing employment anchors

Anchor institutions, such as universities, hospitals and airports, play a vital role in their communities and economies. Anchor institutions are unlikely to move location, even during adverse events like an economic downturn. They provide employment and stimulate the local economy. The stability of anchor institutions attracts local businesses, which position themselves to provide goods and services to the institution and its employees².

Environmental Effects – Traffic Impact

- Varga Traffic Group (VTG) has carried out an assessment of the current and future transport and access characteristics of the area around Campsie and the Canterbury Road corridor in the vicinity of the site. The features and opportunities of the planning proposal for the proposed amended Height of Buildings control and concept design for a new private hospital in transport and traffic terms are considered and conclusions are drawn as follows: the concept design for the scheme envisages a new laneway at the rear of the site, providing vehicular access to the development from Stanley Street and separation to the northern sites fronting Perry Street
- off-street car parking is intended in a new multi-level basement parking area
- in order to reduce the associated traffic impact, it is recommended that the off-street car parking requirement is *reduced* by 25% (or potentially more), whilst bicycle parking is *increased* by 25%
- the site is well served by public transport and other non-car access options. There are in the order of 680 bus services per day travelling near the site on weekdays, with close to 470 bus services per day on Saturdays and approximately 360 services on Sunday and public holidays. The site is located within walking distance to/from Campsie Railway Station and Canterbury Railway Station, which are both part of a major rail network interchange. It is also pertinent to note that Campsie Town Centre in the vicinity of the railway station is earmarked for super high density residential, such that there is also the potential for employees to live in those future apartment complexes and therefore walk to/from work at the private hospital
- a range of strategies could be implemented into the development proposal in order to significantly reduce the associated traffic impact of the development, including implementation of a Green Travel Plan, encouraging access by walking and cycling, and a higher portion of public transport trips and car share users. A significant amount of bicycle parking and end-of-trip facilities are envisaged within the development as an indicator that the development will promote a more sustainable approach to travel. Specific measures are

recommended include that the off-street car parking requirement is *reduced* by 25% (or potentially more), whilst bicycle parking is *increased* by 25%

- based on the analysis and on-going consideration by Council and RMS of changes to nearby intersections, it is recommended that discussions continue to be undertaken with Council, with potentially further traffic modelling conducted, to further determine what measures will be required to accommodate the proposed Height of Building control, which would facilitate approximately a 5:1 FSR on the subject site, with regard also to other potential uplifts within the wider B6 zone.

Refer to the VTG assessment report at **Appendix 8**.

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

The proposed modern health facility in Campsie will deliver a number of significant social and economic benefits to the area including the generation of a variety of medical and health related jobs, private investment and enhanced medical and healthcare services to the community. Future social and economic impacts resulting from the development will be positive. The SEIA report prepared by Ethos Urban addresses these factors.

It is noted that the redevelopment of the site will create longer term stability for the local area through the existence of a major health facility shared by the community. While it is acknowledged that the proposed development will have some impacts on local businesses and residents, these will be mitigated through ensuring careful and culturally sensitive design and preparing a meaningful place strategy. Furthermore, a liaison committee is recommended to be formed in order to keep local residents and business operators well informed on the planning process, construction timetabling and potential impacts of the project. This will facilitate an avenue to provide project development updates and address any concerns should they arise. Overall, the long-term social benefit is considered positive and desirable for the locality and wider LGA.

It is anticipated that shorter term impacts will primarily remain very localised around the demolition of the existing buildings and construction of the hospital. Longer term impacts (both negative and positive), such as visual amenity, traffic, noise, vibration, air quality, connectivity, and community sense of place, are also anticipated to occur within close proximity to the project. The development of the site will be undertaken in accordance with an appropriate Construction Management Plan to mitigate these associated impacts and operationally the hospital will be managed to be a good neighbour. Overall, the positive impacts will outweigh the lesser negative impacts anticipated.

The investment in new health infrastructure would complement the existing services and facilities available in the area including Canterbury Hospital and existing allied health facilities. This is particularly as the new hospital and its location within the EMPL cluster provides the opportunity to drive new investment in the local property market through stimulating demand for ancillary health services and accommodation.

The proposed development will accrue direct and indirect employment generated during the construction and operational phases. It is anticipated to accommodate

approximately 218 bed facilities which Ethos Urban estimate will sustain the ongoing employment of around 1,090 full time, part time and casual workers at a full bed occupancy.

Additionally, the considerable job creation will benefit the construction industry (with direct employment expressed as FTE job years) as well as facilitate business growth for local retail, manufacturing and wholesale businesses. With increased visitors to the area to access the variety of medical services, there will be a multiplier effect for local businesses who will benefit from increased sales and revenue.

It is understood that the total construction cost of Campsie Private Hospital will be estimated at around \$100 million. This would generate an estimated 245 jobs in the construction industry and support a further 392 jobs in related (supplier) industries over the development period. While the estimated construction duration of four years would facilitate approximately 62 direct and 98 indirect FTE jobs annually for the development – totalling 637 FTE construction jobs supported during the construction phase (Ethos Urban SEIA, section 13, **Appendix 2**).

4.3.3 Section D – State and Commonwealth Interests

Q10. Is there adequate public infrastructure for the Planning Proposal?

Being located on a developed site on the main Canterbury Road within the urban area of Canterbury-Bankstown and in close proximity to Campsie town centre, the site is well serviced by the full range of public utilities including electricity, telecommunications, water, sewer and stormwater. It is expected that these services will be upgraded where required by the proponent.

An assessment of the accessibility of the site by transport infrastructure and public transport is provided in the VTG Traffic and Parking report at **Appendix 8**. The site is located in an area that is very well serviced by public transport. Frequent bus services operate along Canterbury Road and the site is within walking distance from Campsie train station and the new Metro Station. It is expected that many of the people working at the new hospital would live locally, so that the need for them to travel to the site by car would be limited.

Q11. What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

The Gateway Determination will advise the public authorities to be consulted as part of this planning proposal process. Any issues raised will be incorporated into this planning proposal following consultation in the public exhibition period.

4.4 Part 4 – Mapping

Please refer to the proposed amended LEP Height of Building Map shown at **Appendix 6**.

4.5 Part 5 – Community Consultation

This planning proposal is to be exhibited in accordance with the Gateway Determination once issued by the Department of Planning and Environment. It is anticipated the Gateway Determination will require a public exhibition for a period of not less than 28 days in accordance with Schedule 1 item 4 of the Environmental Planning and Assessment Act 1979 and Section 4.5 of *A Guide to preparing Local Environmental Plans*.

4.6 Part 6 – Project Timeline

The anticipated timeframe for the completion of the planning proposal is as follows:

Table 11. Provisional Timeline	
Action Anticipated	Date
Submission of the Planning Proposal	July 2020
Planning Proposal Reported to Council	September 2020
Referral to Minister for Gateway Determination	September 2020
Anticipated commencement date (date of Gateway determination)	October/November 2020
Commencement and completion dates for public exhibition period	October/November 2020
Timeframe for government agency consultation (pre and post exhibition as required by Gateway determination)	December 2020 – March 2021
Timeframe for consideration of submissions	March/April 2021
Timeframe for consideration of a proposal post exhibition	June – July 2021
Consideration of PP by Council (Council Meeting)	July / August 2021
Date of submission to the DPIE to finalise the LEP	September 2021
Anticipated date the Relevant Planning Authority (RPA will make the plan (if delegated) or Anticipated date RPA will forward to the department for notification	October 2021
Anticipated date for publishing of the plan	October 2021

It is understood that the project timeline will be assessed by the Department and may be amended by the Gateway to provide the necessary level of confidence that the LEP will be finalised within a reasonable time.

5 Summary and Conclusion

The planning proposal has been prepared in accordance with:

- Section 3.33 of the *Environmental Planning and Assessment Act 1979* (the Act); and
- The NSW Department of Planning and Environment's (DP&E) *A Guide to Preparing Planning Proposals*.

This report provides a justification for the proposal in line with the Department of Planning and Environment's template for gateway determinations.

The planning proposal is submitted to amend the Canterbury Local Environmental Plan (CLEP) 2012 height control for the site to enable a transformative vision for the subject site and facilitate the delivery of an important new healthcare and medical facility. The strategic objective and need to improve health and medical capacity and care in this area is clear. This planning proposal will actually facilitate this objective to be realised and enable some of the most urgent needs to be addressed.

More specifically, the aim is to also achieve the following objectives and outcomes:

- To provide a site-specific planning framework that enables a new private hospital development consistent with the current zoning for the site. Site specific DCP controls will also be developed in consultation with Council prior to submission for a Gateway Determination;
- Assist in realising the objectives of the Greater Sydney Commission's South District Plan to achieve at least 7,000 jobs in Campsie Strategic Centre by 2036, plus strengthen links to Canterbury Hospital and surrounding allied health services;
- Initiate the delivery of a new health and medical development within the Eastern Lifestyle and Medical Precinct identified in the Canterbury-Bankstown LSPS – Connective City 2036;
- Address the absence of acute or non-acute private hospitals within the Canterbury-Bankstown LGA; and significant shortfall of hospital bed spaces per capita in the Canterbury area (which is approximately *only one-third* of the national average);
- Assist in achieving the priorities of the Sydney Local Health District Strategic Plan 2018-2023, including to develop, plan and construct new and upgraded health facilities to address significant population growth, increasing demand and ageing infrastructure;
- To enable a scale of built-form which provides the critical mass needed to deliver the range of interrelated facilities and functions of a modern private hospital. This will offer critical additional health services to the Local Health District, which is currently under-supplied for these services;
- Through collaboration, create the opportunity for the services envisaged in the concept design to assist the Sydney Local Health District (SLHD) and Canterbury Hospital meet the demand for health services – reducing pressure on waiting lists; and

- Alongside more detailed controls in a site-specific DCP, to manage the likely effects of the proposal in relation to the amenity of neighbouring lower density residential development; in particular located to the south of Canterbury Road.

In order to achieve this, the planning proposal seeks to change the LEP to amend the LEP Height of Building Map in accordance with the proposed height map, which indicates a maximum permissible height of 56 metres on the site.

This approach reflects a taller, narrower concept built form to accommodate the interdependent services and uses within, to meet the identified needs and also functional requirements of a modern private hospital for at this location. This approach to built form also enables the site to offer:

- provision of a rear laneway off Stanley Street to provide vehicular and servicing access to the site (enabling access existing points off Canterbury Road to be closed);
- the laneway will provide the opportunity for a future connection linking through other sites in the block, potentially to Una Street. This will provide options for vehicle access connections and increase permeability of the block, alleviating traffic constraints around this section of Canterbury Road;
- the creation of new public open space as an important community benefit in an area of deficiency, plus amenity space for patients, visitors and workers in the new hospital;
- increased setbacks and separation to properties to the north of the site;
- enhanced natural lighting being available into the new building, to improve the internal environment and reduce reliance on artificial lighting;
- greater scope for internal flexibility and expansion of uses/services; and
- a deep soil area within the site to support new tree planting in an area where there are very few trees – with the potential to extend to a larger pocket park at an adjacent site in the future.

Some balances may need to be struck in terms of environmental effects arising from a taller, narrower building form. A lower, wider built form to meet the services, facilities and space requirements of a new private hospital would rule out all these benefits.

The project is consistent with the B6 Enterprise Corridor zoning for the site.

The LEP is also to be amended to include a provision that development consent must not be granted for development on land to which this clause applies unless a development control plan that provides for detailed development controls has been prepared.

Strategic Merit

The proposal has strategic merit as it aligns with and promotes a number of key strategic planning priorities of Council and the State Government identified within various state, regional and local policies. The intentions of the planning proposal above include these, but specifically the planning proposal is considered to have strategic merit for the following reasons. It will:

- A: Give effect to the objective of the Greater Sydney Commission's South District Plan to support growth in employment to more than 7,000 jobs in Campsie Strategic Centre by 2036 and strengthen links to Canterbury Hospital and surrounding allied health services; and
- B: Give effect to a local strategic planning statement in terms of facilitating and initiating the delivery of a new health and medical development within the Eastern Lifestyle and Medical Precinct identified in the Canterbury-Bankstown LSPS – Connective City 2036. There are limited other sites along this section of Canterbury Road that can initiate and lead the formation of the precinct in the shorter term. This site is ideally located in terms of the urban structure, public transport infrastructure and accessibility to/from Campsie town centre.

The proposal therefore satisfies the strategic merit test, will also promote a number of key strategic planning priorities of Council and Government and responds to the urgent needs identified.

With further regard to reason 'B' above, studies incorporated in this planning proposal report demonstrate how the subject site can become the focal point (functionally and physically) for the Eastern Lifestyle and Medical Precinct. Furthermore, the urban form of both the proposed height and massing for the building can lead future thinking for a structure plan and urban design framework for the transformative change to current urban form needed to establish the wider precinct. Preliminary analysis by GMU is included in this report and appended as a separate study to support the planning proposal.

Site-Specific Merits

The site-specific considerations identified at this stage and from discussions with Council relate to environmental assessment of factors comprising: Built form, building envelope, urban design and townscape; overshadowing and solar access; traffic, transport and parking; and suitability of the location from a wider structure plan perspective.

The assessments undertaken by the project team and findings are provided, but in summary the main conclusions are as follows:

- In terms of clinical needs, the shortage of acute and non-acute private hospital facilities in the LGA is very clear from the assessment work carried out by Ethos Urban and Mostyn Copper. Feasibility has also been considered to determine and ensure viable redevelopment at this location. The scale and critical mass of development needed on the site to assist in responding to these factors – and be a catalyst to the realisation of the new Eastern Lifestyle and Medical Precinct is reasonable and justified;
- The work undertaken by Team2 Architects and GMU has determined the resulting concept design and necessary built form envelope. Urban design analysis has also been carried out to consider this in the current context of this section of Canterbury Road – and as part of a transformed wider B6 zone block which could be achieved in the realisation of the new Precinct focused on Canterbury Road. Based on the 3D massing studies undertaken,

it is reasonable and appropriate to consider increasing the height for subject site located in the B6 zone. Through discussions with Council on associated Site-Specific DCP controls, meaningful technical analysis of solar planes and shadow impacts can be undertaken. Outside of this planning proposal for the subject site, GMU suggests that Council also consider up-zoning the wider B6 block to maximum heights in the range 8-12 storeys to acknowledge the potential of the block in which the subject site is situated.

- Regarding traffic impact, VTG has Identified that a range of strategies could be incorporated into the development of the site in order to manage the potential traffic impact of the development, including implementation of a Green Travel Plan, encouraging access by walking and cycling, and a higher portion of public transport trips and car share users. The Canterbury Road corridor is the focus of various options for changes to managing movement and traffic. It is proposed that through capacity analysis of nearby intersections and further discussions with Council, the measures needed to accommodate the proposed new Height of Building control can be determined for this planning proposal, and in the context of other future potential uplifts within the wider B6 zone.

Conclusion

This report provides a justification of the proposal in line with the Department of Planning and Environment's template. The justification demonstrates that the proposal should proceed on the following grounds:

- It Is consistent with Council's land use vision, planning priorities and actions of the Local Strategic Planning Statement – Connective City 2036;
- It is consistent with the Greater Sydney Regional Plan and District Plan;
- Is consistent with relevant Ministerial Directions;
- Responds to a priority of the Sydney Local Health District Strategic Plan 2018-2023 to develop new and upgraded health facilities;
- Will assist in filling the current and critical gap in provision of health services, as the LGA currently has no acute or non-acute private hospitals;
- Will assist in reducing the current significant shortfall in hospital bed spaces per capita in the Canterbury area, which will worsen as a result of population growth;
- Will enable a new sustainable form of development which will deliver social, economic and environmental regeneration in the Canterbury Road corridor;
- Will enable the more effective use of land located on Canterbury Road; with new uses and facilities accessible to the community, plus open space, urban greening and active frontages; contributing to enhancement at street level and 'boulevard' character to Canterbury Road;
- Through a taller narrower built form configuration on the site, multiple benefits can arise compared to a lower and wider form. This includes creating a new rear laneway which will benefit traffic movement along Canterbury Road, plus

movement and permeability of this B6 block, community benefits of open space and new tree planting;

- Will manage the likely effects of the proposal in relation to the amenity of residential development; in particular located to the south of Canterbury Road; and
- Will contribute significantly to the provision of jobs and economic growth within the Canterbury-Bankstown region.

The planning proposal can capitalise on the opportunity to create a new private hospital which in turn can act as a catalyst for major positive change. This will accelerate the actual achievement of the strategic objective to create and grow a new medical precinct – with significant associated social, healthcare, economic and environmental benefits.



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