



Narellan Medical Centre

Statement of Environmental Effects

August 2016

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1 Introduction

1.1 OVERVIEW

This Statement of Environmental Effects (SEE) has been prepared by Urbis Pty Ltd to support a development application (DA) for a Primary Health Care Medical Centre, submitted under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (as amended). This application is seeking approval for the change of use and alterations and additions to an existing building to become a medical centre on the site at 19 Queen Street, Narellan.

The development application seeks consent for the following works:

- Alterations and additions to the existing commercial building fronting Queen Street for the purpose of a medical centre, including an ancillary pharmacy;
- Alterations and additions to the car park to include 81 spaces;
- Maintaining and improving primary vehicle and pedestrian access from Queen Street;
- Removal of approximately 15 site trees; and
- Improvements to onsite landscaping, including new trees hedge and shrub planting.

This development application is submitted to Camden Council, however, we note that the land is owned by Camden Council and the estimated capital investment value of the proposed development exceeds \$5,000,000; the Joint Regional Planning Panel will be the consent authority of this application.

1.2 STRUCTURE OF THIS REPORT

This report is based on the architectural drawings prepared by *Shellshear Young* (refer to **Appendix A**); as well as other supporting technical information appended to the report (refer Table of Contents), and provides the following:

- A description of the site context including identification of the site, existing development and structures on the site, and surrounding development;
- Detailed description of the proposed development;
- Assessment of the proposed development against the relevant environmental planning instruments and policies, and relevant matters under Section 79C of the EP&A Act;
- Identification and assessment of the key issues relevant to the proposed development; and
- Assessment of the proposal having regard to the public interest.

1.3 PROJECT TEAM

This DA has been prepared on behalf of Primary Health Care, the developers of the site. A number of specialist consultants were also engaged to assist in the preparation of the application, including:

- *Shellshear Young* – Architectural Design, Waste Management Plan and Operational Management Plan
- *Taylor Brammer* – Landscape Architecture
- *Slattery* – Quantity Surveyor Value of Assessment
- *Cardno* – Traffic Access and Parking Report and Survey Plan

- *EWFW Consulting Engineers* - Civil Engineering, Stormwater Management Plan
- *GETEX* – Phase 1 Preliminary Site Contamination Investigation
- *Construction Certificate Solutions* – BCA Advice
- *Naturally Trees* - Arborist

2 Site and Surrounds

2.1 SITE DESCRIPTION

The subject site is known as 19 Queen Street, Narellan. The site comprises one allotment and is legally described as Lot 2 in DP1085432. The site has a street frontage to Queen Street and Elyward Street, with Hume Street, an informal access road located through the site.

The subject site is located within the Narellan Local Centre. The subject site is primarily rectangular in shape with an irregular eastern boundary. The site has a northern (secondary) frontage of 112m to Elyward Street, a western (rear) boundary of approximately 242m, a southern (side) boundary of approximately 100m and a primary frontage to Queen Street of approximately 210m. Outlined in red in **Figure 1**, the site has a total area of 2.169ha and outlined in blue, the approximate development area equates to 1.1ha.

FIGURE 1 – LOCATION PLAN (SOURCE: SIX MAPS)



The site appears to grade gently down towards the east-northeast to the dry creek bed, however the western boundary grades down towards the west to Queen Street. The properties east of the creek bed, including the former landfill, grade gently down towards the dry creek bed. The overall surrounding area gently grades towards the north.

2.2 SITE OWNERSHIP

It is our understanding that Primary Health Care has a lease agreement with Camden Council, as the owners of the subject site. It is noted that Council has consented to lodgement this application, as demonstrated in the application forms. A copy of a current title certificate is provided as **Appendix B**.

2.3 EXISTING DEVELOPMENT

Existing site improvements comprise:

- A two storey commercial building fronting Queen Street (subject building of this application);

- Two vehicular crossovers from Queen Street and a car park located behind the commercial building;
- Two storey commercial building on the northern boundary accommodating the Camden Council and Narellan Library (not subject to this application); and
- A one storey commercial on the southern boundary accommodating the State Emergency Service (not subject to this application).

2.4 SURROUNDING DEVELOPMENT

The proposed development area is surrounded by a mix of commercial, retail and residential land uses. To the:

- **North** – the development area is bound by two storey commercial buildings located on the subject site. Further to the north the site is bound by Elyard Street and Narellan Town Centre which is comprised of a mix of retail, commercial, food and beverage land uses.
- **East** – the development area and subject site is bound by vegetation, Elyard Reserve, vacant land and a mix of low-scale residential developments.
- **South** – the development area and subject site is bound by Hume Street (an internal unclassified road), a state emergency service building and low-scale residential developments.
- **West** – the development area is bound by Queen Street, with a mix of low-scale residential development further west, Nott Oval and Wilton Reserve.

3 Proposed Development

Primary Health Care Limited is a leading medical centre operator in Australia with medical centres located in NSW, ACT, Victoria, Western Australia, South Australia and Queensland. Primary Health Care have identified a demand for additional health care services in the Narellan, and are seeking to establish a medical centre to provide important health care services to the existing and future residents in Narellan and the surrounding area.

The proposal seeks approval for alterations and additions to the existing, two storey commercial building, including a change of use to a medical centre. The proposed development includes a number of significant improvements to the site, including façade treatments, landscaping, accessibility and inclusion of medical centre that will provide essential services to the surrounding area. The details of the proposal sought are summarised below.

3.1 PROPOSED MEDICAL CENTRE

The following table summarises the proposed facilities by level.

TABLE 1 – PROPOSED FACILITIES

LEVEL	PROPOSED FACILITIES
Site Plan	<ul style="list-style-type: none"> ▪ Removal of 15 trees and subsequent landscape improvements onsite as well as 5 new street trees fronting Queen Street; ▪ New paved pedestrian access from Queen Street to the subject building; and ▪ Redesign and development of the existing car park layout to include an 81 car parks, emergency vehicle parking, increased number of disability allocated car spaces, boom gates, loading bays and staff parking.
Ground Floor	<ul style="list-style-type: none"> ▪ 17 consulting rooms for general practitioners; ▪ A pharmacy; ▪ 1 pathology room; ▪ 1 treatment room inclusive of 4 beds ▪ 1 ECG treatment room; ▪ Laundry and cleaning room; ▪ Reception and administration; ▪ Patient amenities; ▪ Waiting area; and ▪ Internal stairs and lift access.
Level One	<ul style="list-style-type: none"> ▪ 7 specialist consulting rooms; ▪ Patient and staff amenities; ▪ Dental clinic, inclusive of 3 consulting rooms; ▪ Physiotherapist, inclusive of 4 consulting beds and a gym area; and

LEVEL	PROPOSED FACILITIES
	<ul style="list-style-type: none"> Radiology clinic, inclusive of 3 ultrasound facilities, waiting areas, x-ray machines, CT exams and reception.

Staff

The medical centre will accommodate the following staff at peak periods. The peak period is between 11:00am – 2:00pm Monday – Friday. The medical centre has a peak operating capacity of approximately 70%.

TABLE 2 – APPROXIMATE STAFF POPULATION AT PEAK PERIODS

STAFF TYPE	UP TO APPROXIMATELY
Pharmacy	2
Consulting Rooms	
GP Consulting Room	18
SP Consulting Room	7
Dental Surgery	3
Radiologist	1
Physiotherapist	1
Support Staff	
Medical Centre	
Reception	3
Admin	2
Practice Manager	1
Treatment Nurse	1
Pathology	1
Specialist	
Reception	1
Admin/Nurse (shared)	0
X-Ray	
Reception	1
Admin	1
Radiographer	1

STAFF TYPE	UP TO APPROXIMATELY
Dental	
Reception	1
Admin/Nurse	2
Physio	
Reception (Shared)	0
TOTAL	36

Hours of operation

The medical centre is proposed to operate Monday – Sunday 7.00am - 10.00pm.

3.2 EXTERNAL BUILDING CHANGES

- Redesign of the existing car park, including parking for 81 cars (14 staff spaces, 67 medical centre and new set down areas for the SES);
- Windows are to be refurbished with new glass and external glazing;
- Small increase in building height to appropriately screen the increase in services and plant room;
- Modifications to the building façade, additional entry, façade features and air lock;
- New alucabond cladding to the parapets, painting and graffiti guard applied to existing external walls, columns, downpipes and gutters, and aluminium sun shading louvers to the ground and first floor;
- Landscaping improvements, inclusive of large trees and low level garden beds;
- Onsite detention basin; and
- Additional lighting in the proposed car parking areas (refer to **Appendix C**).

3.3 TREE REMOVAL

An Arboriculture Impact Appraisal and Method Statement has been prepared by Naturally Trees (refer to **Appendix D**). This appraisal identifies that the proposed development requires the removal of 15 trees.

Of the 15 trees to be removal, one tree is identified as an important trees tree with moderate to high significance and displays good health and condition. It is recommended that consideration should be given to replacement landscaping within the site to compensate for the amenity loss of the significant tree. The other 14 identified trees have been classified as low category value retention trees, not considered significant or worthy of special measures to ensure their preservation.

The appraisal recommends that a comprehensive landscaping scheme to mitigate the potential loss of amenity is proposed, and includes the planting of new trees.

3.4 LANDSCAPE ARCHITECTURE

A Landscape Concept Plan has been prepared by Taylor Brammer Landscape Architects (refer to **Appendix E**). This plan illustrates the landscape improvements and changes associated with the proposed development. This includes:

- The removal of 15 existing trees;
- The addition of 5 large street trees adjoining the Queen Street frontage;
- The addition of a new street avenue and hedge planting on the boundaries of the proposed staff car parking;
- The addition of proposed hedge planting directly west of the building and east of the car park to establish a garden; and
- Hedge and ground cover improvements around the boundaries of the proposed car park.

It is noted that the adjoining riparian flow path will not be impacted by the proposed development and will be protected during any development works.

3.5 SIGNAGE

It is noted that the proposed development does not seek development consent for signage.

3.6 PARKING AND ACCESS

The proposed development seeks to maintain and improve the existing accessibility of the site, by :

- Maintaining the vehicle crossovers to Queen Street, with minor reduction in crossover width to the northern crossover;
- Providing a paved pedestrian connection from the medical centre to Queen Street; and
- Alterations and additions to the car park to allow for 81 car spaces, including 14 staff designated car parks and 67 car parks for visitors.

The car park is delineated by landscaping and boom gates between parking for the Narellan Medical Centre and parking for patrons of the Camden Council Library and Community Centre. The proposed development provides boom gate access for medical centre patrons and staff during operational hours. The purpose of the boom gates is to encourage the delineation of parking between the Council Library and Community Centre, and the medical centre. It is important that the medical centre patrons have vehicular accessibility to the site at all times, especially given the myriad of physical capabilities of the expected patrons. As such, it is imperative that the mandated car parks required by Council are accessible to the patrons of the medical centre, at an acceptable turnover rate.

It is the applicant's intention to operate the patron car park as a paid parking area to deter the use of the car park for non-medical centre reasons. It is noted that the application of a parking fee is not intended as a means of raising revenue, rather, it will encourage pertinent use of the medical centre car park and subsidise the associated car park maintenance.

The operation of boom gates will occur during the medical centre's operational hours. The car park is designed to allow for a two vehicle queue to the medical centre car parking area, to limit impacts on the circulation of the Camden Council Library and Community Centre car park. The proposed system will not require customers to book ahead or require a pre-collected pass card, and therefore, the parking area will be accessible to patrons at all times.

Primary Health Care, the intended tenant, operates similar car park models across a number of sites in Australia, include Warringah, Phillip (ACT), Ringwood (Victoria) and Wyoming (NSW).

For further refer Traffic Impact Assessment prepared by Cardno, **Appendix F**.

3.7 OPERATIONAL MANAGEMENT PLAN

An Operational Management Plan for the Narellan Medical Centre has been prepared by Shellshear Young. The Operational management Plan defines a number of key parameters including:

- Hours of Operation;
- Staffing and Medical Services;
- Car Parking;
- Landscape Maintenance;
- External Lighting; and
- Waste Management.

Refer to **Appendix G** for further detail.

3.8 WASTE MANAGEMENT PLAN

A Waste Management Plan for the Narellan Medical Centre has been prepared by Shellshear Young. The Waste Management Plan defines a number of key management practices for waste during demolition, construction and operational phases of the proposed development.

The Waste Management Plan is prepared in accordance with the Camden DCP 2011.

It is noted that the ongoing waste management for will require licenced contractors and EPA licencing which can be conditioned as a component of development consent.

It is the applicant's intention for licensing and ongoing waste management to comply with the *Protection of the Environmental Operations Act 1997* and Protection of the Environmental Operations (Waste) Regulation 2014.

Refer to **Appendix H** for further detail.

4 Assessment of Planning Considerations

Under Section 79C (1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), in determining a development application the consent authority must take into account a range of matters relevant to the development including the provisions of environmental planning instruments; impacts of the built and natural environment, the social and economic impacts of the development; the suitability of the site; and whether the public interest would be served by the development.

The following assessment includes only those matters under Section 79C (1) that are relevant to the proposal.

4.1 CONSISTENCY WITH RELEVANT STRATEGIC PLANS AND POLICIES

A Plan for Growing Sydney is the only relevant strategic planning document to assessment of the subject application.

4.1.1 A PLAN FOR GROWING SYDNEY

A Plan for Growing Sydney, released by the Department of Planning and Environment in December 2014, is the NSW Government's strategic planning vision for metropolitan Sydney. The Plan is focused on creating a competitive economy and accelerating housing supply, choice and affordability.

Camden is located in the South West Subregion which also incorporates the Campbelltown, Fairfield, Liverpool and Wollondilly local government areas. The Plan identifies two key priorities for the Camden area, being:

“Support planning of Oran Park as a focus for facilities, services and community life to support population growth.

Investigate the potential to leverage off improved access to services and jobs following improvements to Camden Valley Way.”

The proposed development will provide modern medical facilities in the town centre to support the requirements of the growing populations of Narellan, Narellan Vale, Smeaton Grange, Harrington Park and Mount Annan. In this regard the proposed is consistent with the state strategic policy.

4.2 COMPLIANCE WITH RELEVANT STATUTORY PLANS AND POLICIES

Under Section 79C (1) of the *EP&A Act* the consent authority is required to take into account the relevant provisions of any environmental planning instrument, draft instrument, or development control plan in their assessment of a DA. The following legislation is considered relevant to the proposed development:

- *Mine Subsidence Compensation Act 1961;*
- *State Environmental Planning Policy No 55 – Remediation of Land;*
- *State Environmental Planning Policy (State and Regional Development) 2011;*
- *Camden Local Environmental Plan 2010; and*
- *Camden Development Control Plan 2011.*

Further discussion of the key standards and guidelines of the CLEP 2010 and CDCP 2011 is included in the following sections of this environmental assessment.

4.2.1 MINE SUBSIDENCE COMPENSATION ACT 1961

The subject site is identified within the proclaimed Mine Subsidence District under the *Mine Subsidence Compensation Act 1961*. Camden Council should refer the application to the relevant Mine Subsidence District Board. The Board will then identify relevant conditions of approval associated with carrying out the proposed building work.

4.2.2 INTEGRATED DEVELOPMENT

The subject site includes a waterway, and onsite detention works will be required to mitigate post-development flow in storm and flood events. As such the proposed development constitutes interference with an aquifer under the *Water Management Act 2000*. The proposal is therefore integrated development under Section 91 of the *Water Management Act 2000*, and as such requires concurrent consent from the NSW Office of Water.

4.2.3 STATE ENVIRONMENTAL PLANNING POLICY NO 55 – REMEDIATION OF LAND

State Environmental Planning Policy No 55—Remediation of Land (SEPP 55) aims to promote the remediation of land through a consistent state wide planning approach.

SEPP 55 requires that prior to determining a DA; the consent authority must consider if the land is contaminated and if contaminated, satisfied that the land is suitable in its current state (or will be suitable after remediation) for the purpose for which the development is proposed to be carried out.

Due the commercial and light industrial use of the subject site two independent reports have been prepared to assess the sites suitability for residential development. In addition Andrew Kohlrusch of GFD Pty Ltd (Accredited Site Auditor No.208844) has been engaged to conduct an independent audit. Interim Audit Advice has been prepared and provides recommendations to assist in preparing a statement of site suitability.

A Phase 1 Preliminary Site Contamination Investigation has been prepared by GETEX, and is discussed below and included at **Appendix H**.

The GETEX report presents the following findings:

- A review of land title records indicated that the site was owned by Clinton Transports who were connected to mining.
- Council's records indicate that the site was used for coal analytical laboratory and a chemical testing laboratory that generated and stored hazardous waste on site.
- A review of EPA records identified that the site had no licenses, notifications, offences or listings under the Protection of the Environment Operations Act 1997. However, the search did identify a notice for immediate surroundings of the site.
- The site inspection identified a number of potential contamination sources including a pit for an unknown use, a large underground storage tank, and the presence of two substations.
- A review of the Section 149 (2 and 5) certificate issued by Camden Council indicates that the land is not declared to be significantly contaminated land or have other matters outstanding under the Contaminated Land Management Act 1997.
- Within the Scope and Limitations made for the purpose of the investigation, it is the opinion of GETEX that the findings of the investigation present several possible contamination sources of contamination noted above.
- Although there is potential for the site to contain below ground contamination, it is not possible to determine conclusively if there is current below ground contamination without a more detailed assessment involving the collection and chemical analysis of soil samples (and groundwater, if encountered)

The report concluded that it is recommended that a *Phase 2 Contamination Investigation* be undertaken to confirm the extent of contamination (if any). GETEX have been engaged to conduct the recommended further investigations, and the findings of the investigations will be forwarded to Council upon receipt.

4.2.4 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

The purpose of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) is to identify development or infrastructure that is state significant or critical, and to confer the functions on joint regional planning panels to determine development applications.

Under Clause 20 of SRD SEPP, where development is included in Schedule 4A of the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act), the relevant JRPP may exercise the consent function of Council for a development.

Under Schedule 4A of the EP&A Act, the proposed development is included as:

- Council related development over \$5 million (Clause 4); and
- Private infrastructure and community facilities over \$5 million (Clause 6).

The QSS report prepared by Slattery identified that the Total End Cost for the development is \$7,110,000 (exc. GST). This development application is submitted to Camden Council, however, we note that the estimated capital investment value exceeds \$5,000,000; the Joint Regional Planning Panel will be the consent authority of this application.

4.2.5 CAMDEN LOCAL ENVIRONMENTAL PLAN 2010

The *Camden Local Environmental Plan 2010* (CLEP 2010) is the principal environmental planning instrument governing development on the site. The key considerations are addressed below:

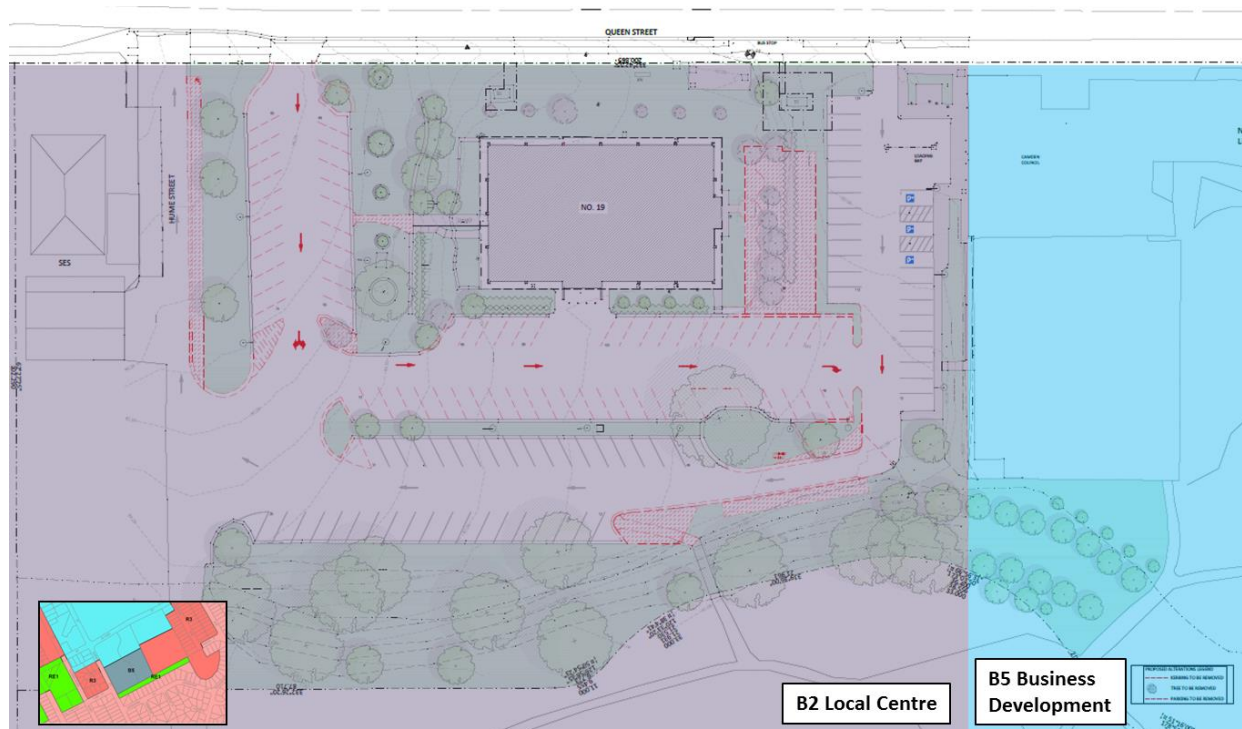
Zoning and Permissibility

The site is identified with split zone controls under the CLEP 2010. The northern area of the site is zoned as B2 Local Centre. The southern area of the site, including the proposed development area, is zoned as B5 Business Development.

In accordance with the definitions of the CLEP 2010, 'medical centres' are captured under the umbrella definition of 'health services facility'. Health services facilities are permissible uses with consent in the B5 Business development zone. Notably, the development area is adjoined by the B2 Local Centre Zone. Within the B2 Zone, medical centres are identified as permissible development. This demonstrates that the proposed use will be consistent with both the site and surrounding area.

The proposal includes the provision of an ancillary pharmacy. The pharmacy will provide convenient and efficient pharmaceutical prescriptions for patients. The pharmacy has a floor area of approximately 46m², equating to less than 10% of the building floor area. Given this and the principle activity of the development being to provide a range of medical services, the pharmacy is clearly subordinate to the medical centre use and therefore is considered ancillary.

FIGURE 2 – INDICATIVE DIAGRAM OF PROPOSED DEVELOPMENT AND APPLICABLE ZONING



Building Height

The building height of the existing development is altered slightly to allow for screening of the increased services and plant facilities required on the roof. It is noted that the proposed building height remains below the allowable 15m and is consistent with the surrounding area.

FSR

The development site does not have an identified FSR control. It is important to note that the proposed development will have a total GFA of 1,552m², including 62m² chemist. We note that this is a reduction in total GFA in contrast to the existing building which is 1,584m².

4.2.6 CAMDEN DEVELOPMENT CONTROL PLAN 2011

The *Camden Development Control Plan 2011* (Camden DCP 2011) is the applicable Development Control Plan for development on the subject site. The proposed development is assessed against the relevant provisions of the Camden DCP 2011 in **Appendix J**. The key matters are summarised below.

Parking

The proposed development's alterations to the existing car parking are generally compliant with the Camden DCP 2011. The Traffic Impact Assessment prepared by Cardno demonstrates that the proposed development exceeds the minimum required number of car parking for a medical centre by providing 81 car parks, including two accessible parking spaces, 14 staff parking spaces, one loading bay and one emergency vehicle car space.

Patients and staff will access the medical centre car park from Queen Street via an existing shared access road, access to the parking will be controlled by a boom gate between the existing shared access road and the new medical centre car park. Patients will exit the medical centre car park via existing access point to Queen Street, also controlled by a boom gate.

It is noted that the proposed car park includes paid car parking for patients and visitors. The purpose of the paid parking facility is to ensure the availability of car parking for visitors of the medical centre, and discourage others from using these car parking facilities given the proximity to the local centre.

Waste Management

A Waste Management Plan has been prepared by Shellshear Young, refer to **Appendix H**. In summary, waste will be separated and managed in accordance with Council's guidelines and the applicant standards for medical facilities.

Flood Prone Land

A Flood Study and Stormwater Management Plan was prepared by EFWF. The plan identified that the proposed building is located above the 1% AEP and 0.6m flood level indicated by Council's Flood Certificate. The exception of Chainage 180, which is located 200mm below flood level, however, this chainage is located 20m from the proposed building, and it was determined that for a flood incursion to occur, it would have to raise approximately one metre above an embankment at RL94.2 before inundation would occur.

The proposed development is designed to mitigate potential flood impacts. For further detail refer to **Appendix K**.

Bushfire Prone Land

The site is partially identified as bushfire prone land (as defined in Section 4 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*). More specifically, small portions of the site adjoining the eastern boundary are identified as Bush Fire Prone Land – Vegetation Category 2 and Bush Fire Prone Land – Vegetation Buffer 100m & 30m.

Section 79BA(1A) of the EP&A Act states that:

If the consent authority is satisfied that the development does not conform to the relevant specifications and requirements, the consent authority may, despite subsection (1), grant consent to the carrying out of the development but only if it has consulted with the Commissioner of the NSW Rural Fire Service concerning measures to be taken with respect to the development to protect persons, property and the environment from danger that may arise from a bush fire.

It is noted the preliminary advice was verbally sought from Camden Council Duty Planner regarding the need for a Bushfire Protection and Attack Assessment to support the proposed application. Council's Duty Planner identified that given the proposed scale and nature of works, a Bushfire Protection and Attack Assessment was not required.

Tree Removal

In accordance with Clause 5.9(2) of the CLEP 2010, the proposed development seeks to remove 15 trees, as illustrated in the Landscape Architecture Plans in **Appendix E** and Aboricultural Impact Appraisal in **Appendix D**. As such, the applicant acknowledges that notification is required.

It is noted, that the proposed development seeks to retain and enhance the majority of trees and vegetation on site that contributes to the local amenity. The proposed trees for removal currently obstruct the proposed pedestrian and vehicular corridors on the site, limiting the accessibility of the proposed medical centre. As such, their removal is considered necessary to allow the proposed development.

The proposed development includes significant landscaping improvements to replace the tree loss. This includes the addition of 5 large street trees adjoining the Queen Street frontage, new street tree avenue and hedge planting on the boundaries of the proposed car park areas. These landscaping improvements will address any potential aesthetic, botanical and ecological value impacts associated with the removal of the 15 trees.

It is considered that these improvements will significantly assist in protecting and enhancing the local landscape amenity despite the removal of 15 trees to accommodate the proposed development.

4.3 LIKELY IMPACTS OF DEVELOPMENT

The likely impacts of the proposal are limited to environmental, traffic and access, waste management and BCA compliance. These impacts are addressed in the following section.

4.3.1 ENVIRONMENTAL

The proposed development predominately comprises alterations and additions to an existing commercial building. No substantive built form changes are proposed, thus no additional impacts such as overshadowing, visual privacy and views will be a result of this development.

The proposed nature of this development will not generate any adverse noise or odour impacts.

The Arboriculture Impact Appraisal and Method Statement prepared identifies that the proposed development requires the removal of 15 trees. Of the 15 trees to be removed, one tree is identified as an important tree with moderate to high significance and displays good health and condition. The other 14 identified trees have been classified as low category value retention trees, not considered significant or worthy of special measures to ensure their preservation.

The appraisal recommends that the comprehensive landscaping scheme proposed will mitigate the potential loss of amenity, with significant additional landscaping treatments proposed to enhance the amenity of the site in accordance with Council's controls and the surrounding character.

The Phase 1 Preliminary Contamination Investigation prepared by GETEX found that there is potential for the site to contain below ground contamination, it is not possible to determine conclusively if there is current below ground contamination without a more detailed assessment involving the collection and chemical analysis of soil samples (and groundwater, if encountered). A *Phase 2 Contamination Investigation* is being undertaken to confirm the extent of contamination (if any). GETEX have been engaged to conduct the recommended further investigations, and the findings of the investigations will be forwarded to Council upon receipt.

It is noted that the operation and design of the medical centre will be in accordance with the relevant requirements, guidelines and regulations including:

- Medical Board of Australia, Australia health Practitioner Regulatory Agency and NSW Department of Health Requirements;
- Australian health Infrastructure Alliance "Australian Health Facilities Guidelines"
- *Private Health Facilities Act 2007* and Private Health Facilities Regulation 2010 (as revised); and
- Radiation Control Act, Radiation Control Amendment Act and Radiation Control Regulations.

4.3.2 TRAFFIC AND ACCESS

A Traffic Impact Assessment has been prepared by Cardno (refer to **Appendix F**). The assessment considered a number of scenarios and concluded that the proposed development would result in satisfactory traffic impacts for the following reasons:

- It is expected to generate approximately 176 vehicle trips in the AM peak hour and 149 vehicle trips in the PM peak hour period;
- Some staff of the proposed development will use public transport given the site is well-connected to surrounding suburbs by bus;

- The proposed development exceeds the minimum car parking requirements of the Camden DCP 2011, including a total of 81 parking spaces, including 2 accessible car spaces, 14 staff parking spaces, one loading bay and one emergency vehicle car space.
- The patient and visitor car park will operate as a paid parking area. Patrons will enter the access road via Queen Street driveway and with access granted upon ticket retrieval at the entry boom gate.
- The required swept path requirements have been achieved, and appropriate recommendations to ensure accessibility and minimum site distance and site lines are maintain for pedestrian safety have been outlined.

The report demonstrates the proposed car park arrangements are consistent with the relevant development approvals located on site, including the Camden Council Library (DA/1467/2003). The proposed site plan allows for the retainment of 73 car spaces with a minimum width of 2.6m that are accessible to the patrons of the Camden Council Library.

4.3.3 WASTE MANAGEMENT

A Waste Management Plan has been prepared by Shellshear Young. This plan demonstrates that the proposed development will minimise waste generation and disposal, provide appropriate waste management services for medical waste, ensure waste collection zones are accessible and appropriate for the projected waste and ensure waste is disposable in a lawful manner during the proposed demolition, construction and occupation.

The Waste Management Plan is prepared in accordance with the Camden DCP 2011, refer to **Appendix H** for further detail.

4.3.4 CIVIL ENGINEERING

The Stormwater Management Plan and civil engineering drawings have been prepared by EFWF Consulting Engineers, refer to **Appendix K**. These plans demonstrate that limited impacts will occur to the existing contours of the site as a result of the proposed development.

The Stormwater Management Plan identifies that the proposed development will result in an additional discharge of 0.022m³ per second in a 1 in 100 year storm event. This will be captured by the proposed onsite detention structure prior to discharge into the drainage channel, and therefore no additional post-development flows will discharge to the drainage channel. The plan recommends an additional 450m² of impervious area is added to the existing Council pipe drainage system via the proposed onsite dentition.

4.3.5 ADOPTED STANDARDS BUILDING CODE OF AUSTRALIA

The proposed building has been designed in accordance with the Building Code of Australia and *Disability Discrimination Act 1992*. Construction Certificate Solutions have reviewed the proposed plans and are satisfied that the current building is readily capable of achieving suitable levels of compliance for the proposed change of use. Refer to **Appendix G** for further information.

4.4 SITE SUITABILITY

The site and building is highly suitable for the proposed development for the following reasons:

- The development area is zoned B5 Business Development under the CLEP 2010, which permits health service facilities and specifically medical centres as permissible development;
- The proposal is consistent with the objectives of the B5 Business Development zone, as it encourages and enables land uses such as medical centres and ancillary pharmacies that complement the primary office and retail functions of the local centre zone;
- The CDCP 2011 outlines detailed controls for the redevelopment of the site. The proposal is generally consistent with the use mix, character built form envisaged for the site;

- The site is surrounded by a mix of compatible uses within the Narellan local centre including Narellan Shopping Centre which provides a mix of commercial services and retail uses to the surrounding residential population;
- The proposed medical centre will provide enhanced accessibility to health services facilities for the surrounding residential land uses in a convenient town centre location; and
- The proposal represents an appropriate adaptive re-use of an existing building.

4.5 ANY SUBMISSIONS

Any submissions received by Council during any required exhibition period will need to be considered.

4.6 THE PUBLIC INTEREST

The proposed development provides for a number of public benefits on the site for the use and benefit of existing local residents and workers in the surrounding neighbourhood. The proposal is in the public interest for the following reasons:

- The proposal is consistent with the relevant Council objectives and controls relating to the site and is complementary to the surrounding development character;
- The proposal provides for the economic utilisation of a currently commercial office building for Camden Council;
- The proposed is for a medical centre that will accommodate existing and future health service needs and provides employment opportunities; and
- The proposal will provide a range of health services to a growing number of employees and residents in the Narellan Local Centre.

5 Conclusion

The proposal is for the use, internal fit out and alteration and additions to an existing building located on 19 Queen Street, Narellan. The proposed development has been assessed against the relevant environmental planning instruments and policies. The compelling reasons why a positive assessment and determination of the project should prevail are summarised below.

- The proposal is consistent with the relevant Council objectives and controls relating to the site and is complementary to the surrounding development character;
- The proposal provides for the economic utilisation of an existing Council commercial office building;
- The proposed development includes significant landscape and façade improvements that will improve the amenity of the site;
- The proposed development is for a medical centre and ancillary pharmacy that will support existing and future health service needs and provides employment opportunities in the area, making a positive contribution to the Narellan Local centre.

Having considered all the relevant matters, we conclude that the proposal represents an excellent development outcome that upholds Council's vision for Narellan. The proposal is considered worthy of approval by the Joint Regional Planning Panel.

Disclaimer

This report is dated June 2016 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Primary Health Care (**Instructing Party**) for the purpose of Development Application (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A

Architectural Package

Appendix B

Title Certificate

Appendix C

Lighting Plan

Appendix D

Aboricultural Impact Appraisal and Methodology Statement

Appendix E

Landscape Concept Plan

Appendix F

Traffic and Parking Impact Assessment

Appendix G

Operational Management Plan

Appendix H

Waste Management Plan

Appendix I

Phase 1 Preliminary Contamination Investigation

Appendix J

CDCP 2011 Compliance Assessment

TABLE 3 – CAMDEN DCP 2011 COMPLIANCE ASSESSMENT

ITEM/ CONTROL	COMPLIANCE	
<i>Part A: Administrative Provisions</i>		N/A
<i>Part B: General land Use Controls</i>		Complies
<i>B1.1 Erosion and Sedimentation</i>	The proposed development is predominately alterations, additions and fit outs to an existing commercial development for a medical centre. Any required building work will be designed to respond to the natural topography, minimising the extent of cut and fill required and therefore impacts on erosion and sedimentation.	Complies
<i>B1.2 Earthworks</i>	The proposed development is predominately alterations, additions and fit outs to an existing commercial development for a medical centre. Any required building work will be designed to respond to the natural topography, minimising the extent of cut and fill required.	Complies
<i>B1.3 Salinity Management</i>	Not Applicable – The proposed development includes alterations, additions and fit outs to an existing commercial development for a medical centre. The proposed changes will not impact the salinity of the site.	N/A
<i>B1.4 Water Management</i>	Not Applicable – The proposed development includes alterations, additions and fit outs to an existing commercial development for a medical centre. The proposed changes will not impact the existing water management.	N/A

ITEM/ CONTROL	COMPLIANCE	
<i>B1.5 Trees and Vegetation</i>	<p>In accordance with Clause 5.9(2) of the CLEP 2010, the proposed development seeks to remove 15 trees. As such, the applicant acknowledges that notification is required.</p> <p>It is noted, that the proposed development seeks to retain and enhance the majority of trees and vegetation on site that contributes to the local amenity. The proposed trees for removal currently obstruct the proposed pedestrian and vehicular corridors on the site, limiting the accessibility of the proposed medical centre. As such, their removal is considered necessary to allow the proposed development. This has been confirmed by the Arboricultural Impact Appraisal prepared by Naturally Trees.</p> <p>The proposed development includes landscaping improvements such as the addition of 5 large street trees adjoining the Queen Street frontage, new street tree avenue and hedge planting on the boundaries of the proposed car park areas. It is considered that these improvements will significantly assist in protecting and enhancing the local landscape amenity despite the removal of 15 trees to accommodate the proposed development.</p>	Complies
<i>B1.6 Environmentally Sensitive Land</i>	Not Applicable – The proposed development area is not identified as environmentally sensitive land.	N/A
<i>B1.7 Riparian Corridors</i>	Not Applicable – The proposed development area does not contain a riparian corridor.	N/A
<i>B1.8 Environmental and Declared Noxious Weeds</i>	Not Applicable – The proposed development area does not contained environmental and declared noxious weeds.	N/A
<i>B1.9 Waste Minimisation and Management</i>	A Waste Management Plan has been prepared by Shellshear Young in accordance with Council's guidelines, refer to Appendix H .	Complies
<i>B1.10 Bushfire Risk Management</i>	<p>The site is partially identified as bushfire prone land (as defined in Section 4 of the <i>Environmental Planning and Assessment Act 1979 (EP&A Act)</i>). More specifically, small portions of the site adjoining the eastern boundary are identified as Bush Fire Prone Land – Vegetation Category 2 and Bush Fire Prone Land – Vegetation Buffer 100m & 30m. It is noted that these affected areas are located outside of the proposed development area.</p> <p>Furthermore, given the proposed development seeks approval for alterations, additions and fit outs to an existing commercial development for a medical centre. Council confirmed that a Bushfire Risk Management was not required.</p>	Complies

ITEM/ CONTROL	COMPLIANCE	
<i>B1.11 Flood Hazard Management</i>	<p>A Flood Study and Stormwater Management Plan was prepared by EWWF. The plan identified that the proposed building is located above the 1% AEP and 0.6m flood level indicated by Council's Flood Certificate. The exception of Chainage 180, which is located 200mm below flood level, however, this chainage is located 20m from the proposed building, and it was determined that for a flood incursion to occur, it would have to raise approximately one metre above an embankment at RL94.2 before inundation would occur.</p> <p>An onsite detention is proposed to accommodate the addition 0.022m³ per second of post-development flows in a 1 in 100 year event to ensure no additional flows are imposed on the existing drainage channels.</p> <p>The proposed development is designed to mitigate potential flood impacts. For further detail refer to the Flood Study and Stormwater Management Plan.</p>	N/A
<i>B1.12 Contaminated and Potentially Contaminated Land Management</i>	<p>The Phase 1 Preliminary Contamination Investigation prepared by GETEX found that there is potential for the site to contain below ground contamination, it is not possible to determine conclusively if there is current below ground contamination without a more detailed assessment involving the collection and chemical analysis of soil samples (and groundwater, if encountered). A <i>Phase 2 Contamination Investigation</i> is being undertaken to confirm the extent of contamination (if any). GETEX have been engaged to conduct the recommended further investigations, and the findings of the investigations will be forwarded to Council upon receipt. The proposed use will comply with environmental management and waste disposal practices to ensure the site remains uncontaminated.</p>	Will Comply
<i>B1.13 Mine Subsidence</i>	<p>The subject site is identified within the proclaimed Mine Subsidence District under the <i>Mine Subsidence Compensation Act 1961</i>. Camden Council should refer the application to the relevant Mine Subsidence District Board. The Board will then identify relevant conditions of approval associated with carrying out the proposed building work. The proposed development includes alterations, additions and fit outs to an existing commercial development. As such, risks of future mine subsidence are minimised, and the proposed development will comply with required conditions.</p>	Will Comply
<i>B1.14 Development adjoining Sydney Catchment Authority Controlled Areas – The Upper Canal</i>	<p>Not Applicable – The proposed medical centre does not adjoin the Sydney Catchment Authority Controlled Areas – The Upper Canal.</p>	N/A
<i>B1.15 Development near Camden Airport</i>	<p>The proposed development does not seek to change the existing building height which complies with the Camden Airport Obstacle Limitations Surface and Procedures for Air Navigation Services –Aircraft Operations contained in the Camden Airport Master Plan. All materials of buildings will maintain low reflectivity, comply with necessary circulars and any ground lighting will not exceed maximum intensities.</p>	Complies

ITEM/ CONTROL	COMPLIANCE	
<i>B1.16 Acoustic Amenity</i>	Not Applicable - The proposed medical centre will not adversely impact the acoustic amenity of the site or the surrounding area.	N/A
<i>B1.17 Air Quality</i>	Not Applicable - The proposed medical centre will not emit pollutants that are conducive to smoke formations or poor air quality.	N/A
<i>B1.18 Trial Periods</i>	Not Applicable – The proposed medical centre will complement the existing uses in the area. The use does not require a trial period as the development will have minimal adverse impacts on other uses in the vicinity.	N/A
<i>B2 Landscape Design</i>	A landscape concept plan has been prepared by Taylor Bremmar in accordance with Council's guidelines. Refer to Appendix E for further information.	Complies
<i>B3 Environmental Heritage</i>	The subject development site is not located within an area of European Heritage or Aboriginal Culture and Heritage	N/A
<i>B4 Advertising and Signage</i>	The proposed development does not include advertising or signage. These uses will be subject to subsequent development applications.	N/A
<i>B5 Access and Parking</i>		
<i>B5.1 Off Street Car Parking Rates/Requirements</i>	<p>The proposed development provides car parking in accordance with Table B8 and B9 of Council's Schedule of Car Parking Requirements. Specifically, it includes 81 car parking spaces, including two accessible parking spaces, 14 staff parking spaces, one loading bay and one emergency vehicle car space. As illustrated on the proposed site plan, the purpose of specific car parks or service areas will be clearly designated.</p> <p>For further information regarding the proposed development's compliance with the statutory parking requirements, refer to the Traffic Impact Assessment prepared by Cardno in Appendix F.</p>	Complies

ITEM/ CONTROL	COMPLIANCE	
<i>B5.2 Car Parking Design Criteria</i>	<p>The proposed amendments to the existing car park are designed generally in accordance with the relevant B.5.2 Car Parking Design Criteria.</p> <p>The proposed car parking area is located behind the existing commercial building, and is predominately consistent with the existing car park facility. Landscape improvements are proposed to assist in softening the appearance of the car park to the surrounding land uses.</p> <p>The proposed development will be able to maximise staff and visitor access to public transport by improving the paved pedestrian connections to and from the site.</p> <p>It is noted that the proposed car park includes paid car parking for visitors. This paid parking will only apply to visitors who exceed a set, reasonable time period of use for the car park. The purpose of the paid parking facility is to ensure the availability of car parking for visitors of the medical centre, and discourage others from using these car parking facilities given the proximity to the local centre.</p> <p>For further information regarding the proposed development's compliance with the car park design, refer to the Traffic Impact Assessment prepared by Cardno in Appendix F.</p>	Generally Complies
<i>Part C: Residential Subdivision</i>		N/A
<i>Part D: Controls Applying to Specific Land Uses/Activities</i>		Complies
<i>Commercial and Retail Development</i>		
<i>D3.2 General Controls Applying to all Business Zone Areas</i>		
<i>D3.2.1 Function and Uses</i>	The proposed medical centre provides an essential community use that will assist in meeting the existing and future health needs of the resident and worker population of Narellan.	Complies
<i>D3.2.2 Layout/Design</i>	The proposed use will be located in an existing commercial building, and is not located in close proximity to sensitive land uses that would provide conflict noise and amenity conflicts. The proposed alterations to the site provide improved pedestrian access and parking, maintaining and enhancing any views, vistas or amenity of the surrounding area.	Complies
<i>D3.2.3 Built Form and Appearance</i>	The proposed alterations and additions to the existing commercial building are predominately associated to the internal fit out. The limited changes to the external appearance, including insignificant height increase to accommodate increased screening of servicing and plant facilities, and façade treatment are generally aligned with the existing and surrounding facilities. The proposed landscape improvements, and pedestrian connections will assist in further establishing the sense of place with the Council and non-profit organisations in close proximity. The proposed built form will not cause significant overshadowing, and will provide opportunities for casual surveillance.	Complies

ITEM/ CONTROL	COMPLIANCE	
<i>D3.2.4 Pedestrian Amenity</i>	The proposed development includes the addition of a pedestrian footpath from Queen Street directly to this commercial building.	Complies
<i>D3.2.5 Public Domain</i>	The proposed development includes a landscape concept plan that ensures landscape design in accordance with Council's requirements and provides for amenity for site users, and the surrounding land uses.	Complies
<i>D3.2.6 Parking and Access</i>	The proposed development provides car parking and access in accordance with Council's requirements. Refer to the Traffic Access and Parking Assessment for further information.	Complies
<i>D3.8 Narellan Business Park – B5 Business Development</i>	Although the proposed development is located within the B5 Business Development Zone, it is not located in the Narellan Business Park as mapped by Figure D52.	N/A

Appendix K

Flood Study and Stormwater Management Plan and Civil Drawings

Appendix L

Water Quality Management Report

Appendix M

BCA Advice

Appendix N

Hazardous Building Materials Register

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