



16th December 2010

Mr Sam Haddad
Director-General
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Mr Haddad,

Request for new Opinion under Clause 6 of State Environmental Planning Policy (Major Development) 2005 and issue of Director-General's Environmental Assessment requirements For the redevelopment of Hornsby Ku-ring-gai Mental Health.

In November 2008, the then Minister declared the above project to be a Major Development to which Part 3A of the Environmental Planning and Assessment Act 1979 applied (MP 08_0227). Director General's Environmental Assessment Requirements (DGRs) were issued on 4th December 2008.

Since that date the design of the project has changed slightly and the DGRs have also expired. The Project is on the critical path for the delivery of Mental Health reform in NSW and therefore in view of the above we now seek a new Opinion under Clause 6 of State Environmental Planning Policy (Major Development) 2005 (Major Development SEPP), and we request that the Director-General identifies the Environmental Assessment Requirements for the project. The purpose of this letter is to provide a Preliminary Environmental Assessment that:

- outlines the proposed development;
- briefly reviews relevant environmental planning instruments;
- reviews relevant planning controls; and
- identifies the key issues that will need to be addressed in the Project Application.

Background

Hornsby Ku-ring-gai Hospital is a part of the North Sydney Central Coast Area Health Service (NSCCAHS). This resulted from the amalgamation in 2005 of the former Northern Sydney Health (NSH) and Central Coast Health (CCH) Area Health Services. NSCCAHS extends from Sydney Harbour to the northern Central Coast and includes Hunter's Hill, Lane Cove, Mosman, North Sydney, Ryde, Willoughby, Hornsby, Ku-ring-gai, Manly, Pittwater, Warringah, Gosford and Wyong Local Government Areas.

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The Area has been divided into four health services:

- Central Coast
- Hornsby Ku-ring-gai
- Royal North Shore/Ryde
- Northern Beaches

Mental Health Services within NSCCAHS include:

- Macquarie Hospital, at North Ryde has a mental health specialist tertiary referral unit which provides non acute, long stay and very long stay service modalities. This facility focuses on recovery and rehabilitation strategies.
- Coral Tree Family Services on the Macquarie Hospital campus provides a state-wide child & family mental health service.

The Hornsby Ku-ring-gai Hospital has been providing health care to the region stretching from the Hawkesbury River to Lindfield, east to St Ives and west to Pennant Hills, Cherrybrook and Epping since 1933. The Hospital is a teaching Hospital of the University of Sydney and offers a range of services over its numerous hospitals, health centres and education centres. Specifically, Hornsby Ku-ring-gai Health Service offers the following specialised services:

- Coronary and intensive care;
- Child and adolescent unit ;
- Emergency department ;
- Rehabilitation and aged care service ;
- Maternity and obstetric care, and women's health;
- Allied health services (physiotherapy, occupational therapy and social work);
- Medical and Surgical Services; and
- Counselling and Mental Health Inpatient Services.

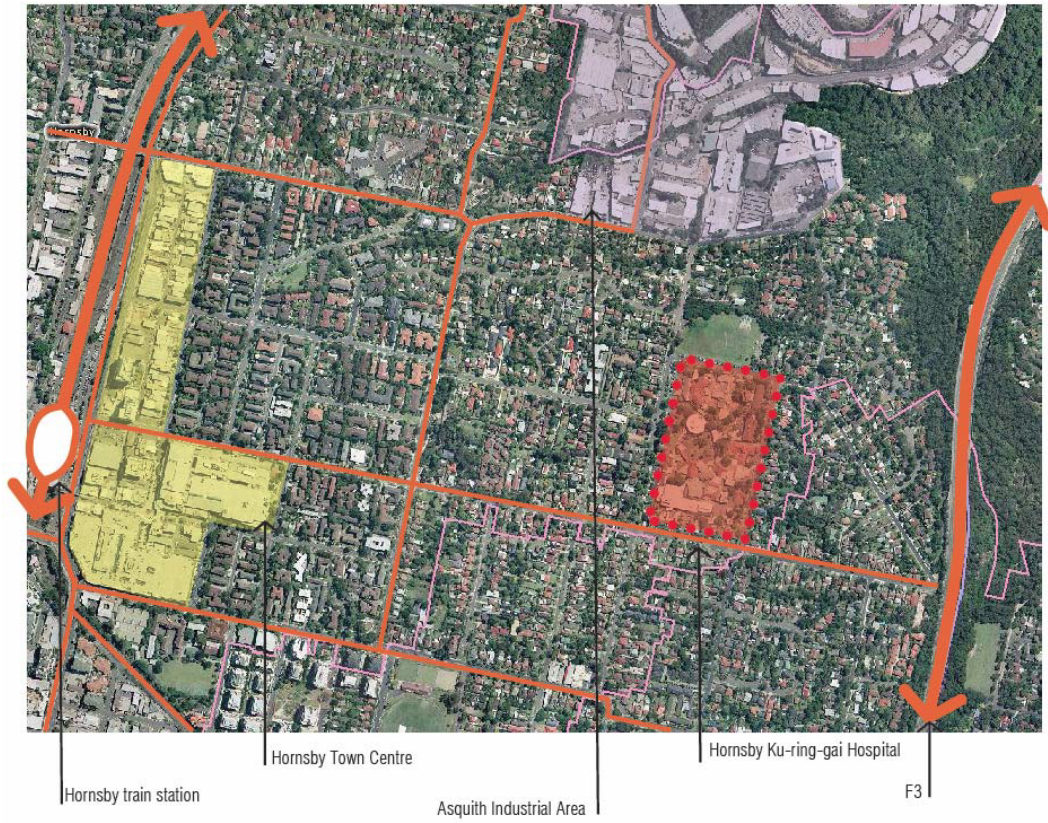
The proposal seeks to partially redevelop the existing Hornsby Ku-ring-gai Hospital to offer a new AAMHU, CAMHU and a CAMHS Community Service. The implementation of this project will address a number of key NSCCAHS needs for child and adolescent mental health and adult acute mental health services as there are currently no CAMH in-patient unit in the North Sydney Central Coast Area Health Service area..

The site

The Hospital site is located approximately one kilometre to the east of the Hornsby Town Centre and occupies an area of approximately 6.4 hectares. The legal description of the area to be redeveloped at the hospital site is Lot A DP 329121 and Lot B DP 329121.

Hornsby Station is located approximately 1.5 kilometres east of the site, 1.8 kilometres north east of Waitara station and 2 kilometres south east of Asquith station. The Pacific Highway, F3 Freeway, Pennant Hills Road and the main North and North Shore Rail lines make Hornsby accessible and a key interchange to the wider area.

The full Hospital site will not be affected by this application. The area of the Hospital subject of this application is identified in detail below.



The northern boundary of the site is bounded by Lowe Road and sits adjacent to James Park James Park is regularly used as a sports facility. To the east, the site is bounded by Derby Road. Land uses are characterised by low density residential units.

The western frontage is bounded by Palmerston Road, the main access to the Hospital, with the southern boundary of the Hospital being Burdett Street. Two private properties (109 and 89 Burdett street) are situated in between the Hospital buildings.

Burdett Street is occupied by low density residential units and is the main access route to the Hospital from Hornsby Station in the west.

The Project

The Project involves the redevelopment of the Mental Health facility within the Hornsby Ku-ring-gai Hospital Campus for:

- A new Adult Acute Mental Health Unit (AAMHU);
- A new Child and Adolescent Mental Health Unit (CAMHU);
- Staff office and support facilities for both units co-located on an upper floor;
- Car parking across the site; and
- Landscaping and signage.

The proposed works seek to:

- Demolish the existing Child and Adolescent Family Team building, located at the north western corner of the site (on the corner of Palmerston and Lowe Roads).
- Construct of a new two storey Inpatient Mental Health facility which will house:
 - A 35 bed Adult Acute Mental Health Unit, replacing the existing 25 bed Lindsay Madew Unit, currently on the eastern side of the site. This existing building is now dysfunctional and not large enough to accommodate the demand. The building is no longer considered appropriate to contemporary medical practice;
 - A 12 bed Child and Adolescence Mental Health Services (CAMHS);
 - Staff office and support facilities for both of the units co-located over both floors.
 - Staff office and support facilities for the CAMHS Community Team will be located on the first floor and integrated with the inpatient Unit. The CAMHS Community Service will relocate the existing Hornsby Sector team into new accommodation and will consolidate a number of staff who are currently located at Hillview in Turramurra.
- Construct an on-grade car park to accommodate 150 cars perpendicular to, and accessed from, Palmerston Road. Car parking facilities will be provided in the immediate vicinity of the new AAMHU, CAMHS and CAMHS Community Team building.
- Development of associated landscaping and signage which will be in keeping with landscaping established within the hospital and surrounding precincts to make the development as complementary to the surrounding environment as possible.

Planning Issues

Strategic Planning Context

The Metropolitan Strategy (Metro Strategy) is the major planning initiative of the Department of Planning to meet the challenges associated with:

- Population Growth over the next 25 years. Residential accommodation and employment opportunities are needed for an additional 1.1 million people who are projected to be living in the Greater Metropolitan Region by 2025.
- Dwindling land supply and the need to contain growth to protect conservation areas and agricultural land.
- Improvements to infrastructure, particularly public transport.

- More effective use of natural resources, particularly energy and water.

The Metro Strategy determines where the key centres in the Sydney Metropolitan area are located to determine opportunities for growth and employment generation.

There are 5 aims set out in the Metro Strategy to achieve these challenges. These are:

- Enhance Liveability: Enhance Sydney’s liveability, by ensuring a diverse choice of housing for an ageing and changing population, close to services, while protecting the character of our suburbs and communities.
- Strengthen Economic Competitiveness: Strengthen Sydney’s long-term economic prosperity by increasing the city and region’s competitiveness in globalised markets, and sharing the benefits across the city.
- Ensure Fairness: Provide fair access to jobs, services and lifestyle opportunities by aligning services close to where people live, and by providing access to high quality transport.
- Protect The Environment: Protect Sydney’s unique environmental setting and reduce the city’s use of natural resources and production of waste.
- Improve Governance: Improve the quality of planning and decision making, and give the community confidence in our institutions

The Hornsby Local Government Area has a target of 9000 new jobs and will emerge as a ‘jobs, services and residential location’ by 2031. With 3000 of these 9000 targeted for the major Centre of Hornsby the proposed redevelopment of the Hospital means increased capacity of the medical capabilities with the expansion and refurbishment of the rehabilitation department. A further 86 staff are estimated as a result of the 47 new beds across the facilities.

It is considered that the project complies with the general aims of the Metropolitan Strategy for Sydney as it supports the aim to strengthen economic growth by adding to the target of 9000 jobs while balancing social and environmental impacts. The proposal will assist to meet the aims of the Sydney Metropolitan Strategy by strengthening the region’s economic prosperity, providing jobs away from the declining industrial industry and offering diversity and specialist services in line with the above strategies for Sydney as a whole.

State Environmental Planning Policies

The following table identifies the State Environmental Planning Policies (SEPPs) that apply to the land or type of development that is subject to this proposal, and the proposals compliance with those Policies.

SEPP #	Name	Applies	Compliant
1	Development standards	✓	✓
4	Development without consent		
6	Number of storeys in building		
14	Coastal wetlands		
21	Caravan parks		
22	Shops and commercial premises		
26	Littoral rainforests		
30	Intensive agriculture		
33	Hazardous and offensive development		
36	Manufactured home estates		
44	Koala habitat protection		

45	Permissibility of mining		
50	Canal estate Development		
55	Remediation of land	✓	✓
62	Sustainable aquaculture		
64	Advertising and signage		
65	Design quality of residential flat development		
71	Coastal protection		
	Housing for Seniors or People with a Disability		
	Major Development 2005	✓	Refer below
	Mining, Petroleum Production and Extractive Industries 2007		
	Temporary Structures and Places of Public Entertainment 2007		
	Infrastructure 2007		
	Rural Lands 2008		
	Exempt & Complying Development Codes 2008		
	Affordable Rental Housing 2009		

Local Environmental Plan

The relevant local planning instrument for the site is the Hornsby Shire Local Environmental Plan 1994. Council has completed it's Comprehensive LEP however it has not be formally placed on public exhibition and is therefore not considered as part of this application.

The subject site is zoned **Special Uses A (Community Purpose)** under the LEP.

The objectives of this zone are:

- (a) to provide for the cultural needs of the community.
- (b) to identify land for the provision of community services and facilities.
- (c) to ensure that community uses are compatible with the amenity of the area in which they are located.

Development for the following purposes are permitted within the zone with consent:

Boarding houses; bus stations; car parks; cemeteries; child care centres; commercial home catering; commercial operation of any sites or facilities administered by the Department of School Education; communications facilities; community facilities; defence purposes; demolition; depots; dwellings; educational establishments; entertainment facilities; group homes; home occupations; home offices; **hospitals**; housing for aged or differently abled persons; materials recycling facilities; medical centres; multi-unit housing; passenger transport terminals; places of worship; public buildings; recreation areas; recreation facilities; registered clubs; utility installations; veterinary hospitals.

User the LEP, Hospital is defined as:

*'A building or place used for the purpose of providing **professional health services** (including preventative care, diagnosis, medical or surgical treatment or counselling) to people admitted as **in-patients**, whether or not out-patients are also cared for or treated at the building or place.'*

On that basis it is considered that the development **is permissible with consent**.

Other issues:

Traffic and public transport

A Traffic and Parking Report has been prepared for the project by URAP-TTW.

The proposed development is expected to have a minimal impact on the road system and intersection performance of the area. The current use of the site is similar to its future use with an additional capacity of some 80 parking spaces.

- An assessment of traffic generation for the proposed development has been considered and findings indicate that any increase in traffic from the proposed development is minimal and is within the capacity of the current operation of the road network in the area. The following illustrates these findings.
- The additional peak hour traffic generation for the site will be at about 40 -4 5 vehicle trips (35 staff (out of 50 during one hour period who drive/arrive to work by car) and 5 visitors/deliveries). Considering that staff arrive or depart within a 2-3 hour period, a lower peak hour traffic generation would be expected (staff working shift hours, part-time staff such as medical officers etc).
- This level of hourly traffic amounts for about less than 1 trip per 1 minute. Therefore, it has no adverse impact on the performances of the road network or intersection operation within the study area or street system in the vicinity of the HKH campus.

Heritage

The Cottage Chapel is a item of local heritage is located on the Hornsby Ku-ring-gai Hospital site to the south east of the proposed AAMHU and CAMHU. In accordance with Clause 4 (1) of the Heritage Act, a local heritage significance is defined:

"...in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item".

The proposed works are remote from the Chapel and therefore are not considered to impact on the heritage significance of the item.

Impacts on neighbours

Due to all residential properties being located on the opposite side of Palmerston road and the proposed building being limited to two storey scale, there will be no resultant overshadowing. Due to the orientation and location of the building proposed, any overshadowing will remain within the Hospital site, or extend to areas of adjoining roads.

The current building is two storeys in height and causes no overshadowing to these neighbours; therefore no overshadowing is anticipated through this proposal.

Consultation undertaken

Consultation with the following relevant parties was sought during the preparation of the Design phase of the proposal.

- Hornsby Shire Council
- Roads and Traffic Authority
- Ministry of Transport
- Utility Providers

As part of consulting with utility providers, Energy Australia and Sydney Water were contacted.

These parties were issued with a letter seeking their response to the proposal along with a copy of the floor plans showing the building footprints. Written responses were received from Hornsby Shire Council, Energy Australia and Ministry of Transport. Correspondence received from Sydney Water noted that their comments would be forwarded directly to the Department of Planning. In December 2010, following a redesign of the facility, new letters and plans were issued.

Application of Part 3A of the Environmental Planning and Assessment Act 1979

Schedule 1 of the Major Projects SEPP sets out those classes of development that qualify as major projects. Specifically, Group 7 'Health and public service facilities', Part 18 'Hospitals' notes the following:

(1) Development that has a capital investment value of more than \$15 million for the purpose of providing professional health care services to people admitted as inpatients (whether or not out-patients are also cared for or treated there), including ancillary facilities for:

- (a) day surgery, day procedures or health consulting rooms, or*
- (b) accommodation for nurses or other health care workers, or*
- (c) accommodation for persons receiving health care or for their visitors, or*
- (d) shops or refreshment rooms, or*
- (e) transport of patients, including helipads and ambulance facilities, or*
- (f) educational purposes, or*
- (g) research purposes, whether or not they are used only by hospital staff or health care workers and whether or not any such use is a commercial use, or*
- (h) any other health-related use.*

(2) For the purposes of this clause, professional health care services include preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, care or counseling services provided by health care professionals.

The proposed redevelopment of Hornsby Ku-ring-gai Mental Health is consistent with the above non-discretionary criteria with regards to the services it will deliver. The capital investment value (CIV) of the project is \$36 million and therefore meets the SEPP criteria as a major project.

Request for Director Generals Requirements

If the Minister is of the opinion that the proposal is a Major Project to which Part 3A of the EP&A Act 1979 applies, Health Infrastructure formally request that the Department of Planning issue the Director General requirements (DGRs) to facilitate the preparation of the Environmental Assessment under section 75H of the EP&A Act 1979.

I trust that the above information is sufficient to enable you to declare this project as a Major Project under Part 3A of the EP&A Act 1979. However If you require any additional information please contact Leoné McEntee on 9661 8019 or 0410 432 505. We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely
Urban Planning Outcomes

Leone McEntee
Director