

10369
2 August 2010

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

Attention: Daniel Cavallo, Acting Director, Government Land and Social Projects

Dear Mr Haddad

**PRINCE OF WALES HOSPITAL, MENTAL HEALTH INTENSIVE CARE UNIT, AVOCA STREET,
RANDWICK - LOT 1 DP 870720**

We are writing on behalf of Health Infrastructure - NSW Health, the proponent for the development of the Prince of Wales Hospital (POWH) Mental Health Intensive Care Unit (MHICU) at Randwick.

The purpose of this letter is twofold:

- firstly, to seek the Minister's opinion as to whether the proposal is a development of the kind described in Schedule 1 (Part 3A project - classes of development) of State Environmental Planning Policy (Major Development) 2005 (the Major Development SEPP) and is therefore a 'major project' to be determined under Part 3A of the *Environmental Planning & Assessment Act, 1979* (the EP&A Act); and
- secondly, to request that, if the proposal is a Part 3A project, you issue your requirements for the preparation of an Environmental Assessment to accompany a Project Application for the proposed development.

This letter outlines the project, describes the site and the locality, provides the statutory planning context, and deals with the matters under the Major Development SEPP (see Section 3.2 below). To support the request for the Director-General's Requirements (DGRs), a Preliminary Environmental Assessment (PEA) of the project identifying the key likely environmental planning issues associated with the proposal follows.

1.0 THE PROJECT

1.1 Background

The South Eastern Sydney Illawarra Area Health Service (SESAHS) does not have a designated Mental Health Intensive Care Unit (MHICU) and is the only metropolitan Area Health Service without such a service. Access to tertiary mental health services in other Area Health Services is limited, and a MHICU is considered essential to the provision of a comprehensive adult mental health service.

Following detailed options development and assessment, the Randwick Health Campus was identified as the most suitable location in the SESIAHS for the MHICU (the only other was St George Hospital at Kogarah). The preferred option, the subject of this application, is to be located in the southeast of the Randwick campus in the proposed future Mental Health Precinct designated in the Randwick Health Campus - Masterplan Principles Review (September 2008, prepared for the SESIAHS). The development and its location are consistent with the directions set out in the Masterplan Principles Review.

The preferred option has been subject to the internal review and approval processes of NSW Health and NSW Treasury, has been endorsed through both quantitative and qualitative assessment, and is documented in the *Mental Health Intensive Care Unit Service Procurement Plan/ Project Definition Plan* (SPP/PDP) (February 2010), which also sets out the need for, and benefits of, the service. The proposed scope is described in Section 1.2 below.

The MHICU will be a purpose-built 12 bed specialist tertiary level declared facility (under the meaning of the *Mental Health Act 2007*) providing acute mental health care for acutely ill (involuntary) patients whose behaviour or condition necessitates short-term treatment in a secure environment. It will operate 24 hours a day, seven days a week.

A MHICU enables patients in a highly aggressive state to be treated and then transferred back to the acute mental health unit in their local area. Importantly, by providing an appropriate level of care for patients who meet the criteria for admission to the MHICU, the proposed development will free-up resources in adult acute mental health units for patients requiring general and observation levels of care. A MHICU must be located in close proximity to medical teams and expert resuscitation capabilities.

1.2 Proposed development

Located in the south east corner of the Randwick Health Campus (see Figure2) and with a capital investment value (CIV) of approximately \$16.2 million, the project consists of the construction of a new three (3) storey purpose-built building set back approximately 8 metres from Avoca Street.

The development will provide approximately 5,150 square metres of floor space and consist of the following:

- Lower ground level: a secure discreet entry for patient transport, police, and ambulances as well as loading/unloading, plant room, storage etc.
- Level 1: a 12-bed MHICU with all patient services on a single level and level pedestrian access from the north.
- Level 2: staff offices and staff support facilities.
- One single bed size lift for vertical access.
- Landscaping.
- Dedicated vehicle access (see section 4.1).

No additional parking is proposed.

Concept sketches of the proposed development, prepared by BVN, are provided at **Attachment 1**. The proposal is consistent with the thrust of the Masterplan Principles Review and allows for any potential long term expansion and development of the Mental Health Precinct. This does not form part of this application.

1.3 Project program

Construction is intended to commence in May-June 2011 with occupation by October 2012.

2.0 THE SITE AND CONTEXT

2.1 Locality

The Randwick Health Campus is located on Avoca Street, Randwick, in the northern part of the Randwick local government area (LGA) (see **Figures 1 and 2**). The immediate locality is largely occupied by medical and educational institutions and associated uses and residential streets to the east of Avoca Street. The main institutions on the campus are the Prince of Wales Hospital (POWH) - located generally along Avoca Street, the Royal Hospital for Women (RHW), the Prince of Wales Private Hospital, and the Sydney Children's Hospital, as well as various medical/health related facilities situated in the southern part of the including the Randwick Ambulance Station, the Kiloh Centre, the Black Dog Institute and the recently approved Neuroscience Research Precinct.

The Randwick town centre is to the north east of the campus, UNSW to the west, and 'The Spot' to the east via St Pauls Street.

To the immediate east of the campus (and the site), on the opposite side of Avoca Road, are single houses and small multi-unit dwellings.

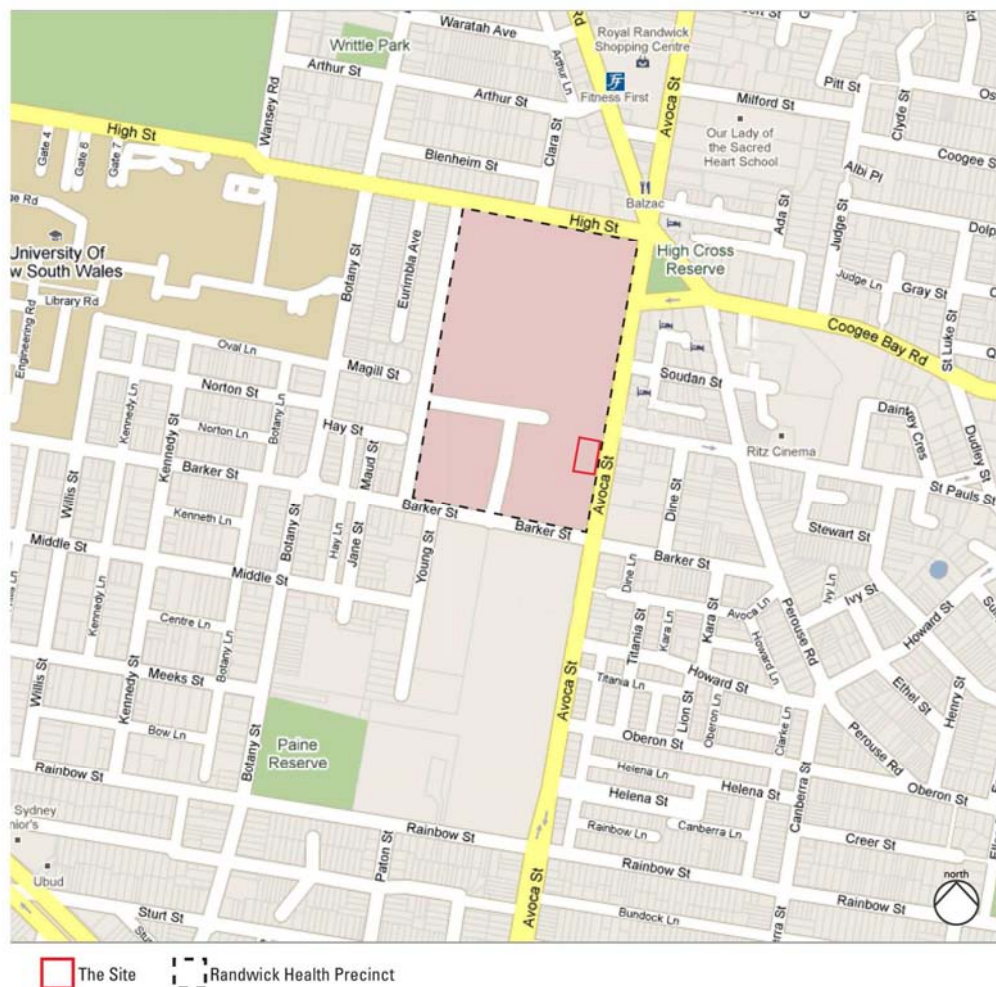


Figure 1 - Locality plan



Figure 2 - Site context plan

2.2 The site

The approximately 2140 square metre development site is shown in **Figure 3** and in the site survey at **Attachment 2**. The land is part of one large lot owned by the South Eastern Sydney and Illawarra health Service, legally described as Lot 1 in DP 870720.

As mentioned above, the MHICU will be situated in the recently designated Mental Health Precinct along Avoca Street some 130 metres north of the intersection with Barker Street. The site is nestled largely within a cutting approximately 4 metres below Avoca Street to the east and the southern edge of Gate 9/ Administration Building 2 car park (see **Figures 4** and **5**). Accordingly, the lower ground level will not be visible from Avoca Street.

Specifically, the development site is bounded as follows:

- to the east: Avoca Street (4 lanes including parking) and residential dwellings (see **Figures 6 and 7**)
- to the north: CANTEEN, the Palliative Care Unit, and the Gate 9/ Administration Building 2 car park (see **Figures 5, 7 and 8**);
- to the south: the Vera Adderley car park; and
- to the west: vacant land (see **Figures 9 and 10**) with Nurses Road and (3 storey) multi-deck car park beyond.

Site boundaries, heights of the cutting and other topographic details will be confirmed with a site survey and submitted with the EAR.

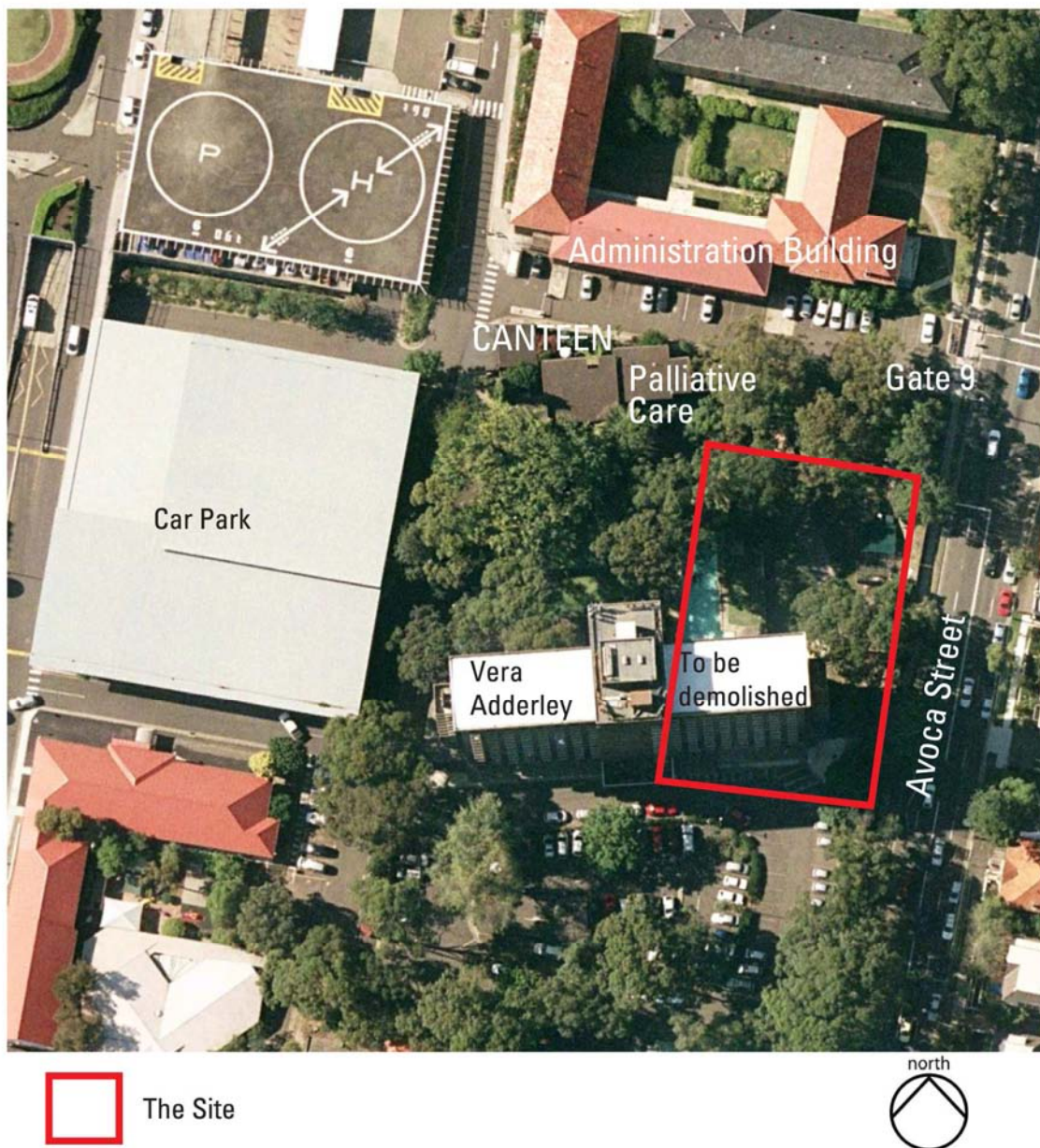


Figure 3 - Development site



Figure 4 - Eastern boundary of site with Avoca Street behind the paling fence



Figure 5 - Northern boundary of site (Palliative Care Unit to the left and Admin. Building 2 to the right)



Figure 6 - Avoca Street



Figure 7 - View of site from Gate 9 on Avoca Street

2.3 Existing development

As shown in **Figures 8, 9 and 10** the development site is currently occupied by the vacant (and soon to be demolished) Vera Adderley Building - formerly a nurses, a disused swimming pool and various sheds. There are numerous mature trees on the site.

The site is burdened by a power easement from Gate 9 along its northern boundary which connects to a substation currently on the site. The easement will need to be adjusted and the substation relocated either adjacent to or below the MHICU building. HI will negotiate these changes with the utility provider.



Figure 8 - View of site from Avoca Street (existing building to be demolished)



Figure 9 - View of site (beyond white fence) from the west (Nurses Drive)



Figure 10 - View of site beyond white fence in the foreground

3.0 RELEVANT PLANNING PROVISIONS

The following strategic plans, and state and local environmental planning instruments, apply to the proposed development:

- Metropolitan Strategy;
- East Subregion Draft Subregional Strategy
- NSW State Plan;
- State Environmental Planning Policy (Major Development) 2005;
- Randwick Local Environmental Plan 1998.

The Randwick Health Campus - Masterplan Principles Review (prepared for the SESIAHS) sets master planning principles for the future development of the campus. The proposal aligns with the thrust of the document in that it is to be located within the designated mental Health Precinct.

3.1 Zoning and Permissibility

Randwick Local Environmental Plan 1998 (LEP) is the principal statutory planning instrument applying to the site. Under the LEP the site is zoned Zone No. 5 (Special Uses). The proposed development is permissible with consent and the consistent with the zone objectives as follows:

- "(a) to accommodate development by public authorities on publicly owned land, and*
- (b) to accommodate development for educational, religious, public transport or similar purposes on both publicly and privately owned land, and*
- (c) to enable associated and ancillary development, and*
- (d) to allow for a range of community uses to be provided to serve the needs of residents, workers and visitors, and*
- (e) to allow for the redevelopment of land no longer required for a special use.*

There are no development standards in the LEP which pertain to the development or the site. Specifically, the LEP does not set height or FSR controls for the zone, and the requirement for a master plan on sites greater than 10,000 square metres (Cl.40A) does not apply.

Under clause 37A (Development in Special Uses Zone) the Council may only grant consent to the development of land within Zone No 5 if it is satisfied that the proposal is compatible with the character of the locality and will not adversely affect the amenity of nearby and adjoining development. As indicated above, the proposed development involves a small three storey hospital building nestled partly within a cutting set back from and below the adjacent public road. In terms of use and character, it is consistent and compatible with the established character of the locality.

3.2 Major Development SEPP 2005

Clause 6(1) of the Major Development SEPP provides that development that, in the opinion of the Minister, is development of a kind described in Schedule 1 (Part 3A project - classes of development) is declared to be a project to which Part 3A of the *Environmental Planning and Assessment Act* (EP&A Act) applies.

'Hospitals' are covered in Clause 18 of Schedule 1 as follows:

- "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 in-patients (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 counselling services provided by health care professionals."*

As stated above, the CIV of the project is approximately \$16.2 million. Accordingly, the proposed development would be a major project to be dealt with under Part 3A of the Act.

4.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

This section outlines the key environmental issues and impacts which could potentially arise from the proposed development. Each is summarised below and will be addressed in the Environmental Assessment Report (EAR) that will accompany the Project Application.

The proposed development provides an essential adult mental health facility in an existing medical precinct and its planning reflects and complies with all relevant NSW State mental health policies and priorities. In accordance with standard NSW Health practice, an Aboriginal Health Impact Statement was prepared and is addressed in the SPP/PDP (referred to above).

The proposal involves a relatively small building located partly below grade on vacant and disused land adjacent to other hospital buildings in a well established medical precinct. Given this, there are few environmental issues relevant to the proposal, and all are able to be managed and mitigated through building design or construction management. At this stage, the following may be relevant to the project:

- access, transport and parking
- interface issues;
- operational noise/acoustic impacts;
- stormwater management;
- ESD;
- geotechnical conditions;
- tree removal; and
- construction traffic, dust and noise.

4.1 Access, transport and parking

The development will generate very little traffic and will have no impact on the surrounding public road network and on the hospital private road network. Direct access will be required to the MHICU for ambulances, police and other emergency and patient transport vehicles to bring patients directly to the Unit, as well as for delivery vehicles. It is proposed that direct vehicle access will be via a dedicated roadway to the lower ground floor of the building either from the existing Vera Adderley car park or via a new roadway from Avoca Street. This will be determined during detailed design.

Other than staff and other officials (eg. magistrates, police), pedestrian access to the MHICU will be reasonably limited. Direct ground level pedestrian access will be provided on the northern site perimeter from the Administration Building 2 car park/Gate 9. The site is able to easily accessed by pedestrians: it is half way down the hospital site and within reasonable walking distance to the High Street main entrance and bus public transport and approximately 200 metres to the hospital Level 0 main entry (Barker Street entry) and the entry to the hospital car park.

Secure parking bay(s) as well as a service loading bay will be provided under the building. No other parking is proposed and staff and others will use the existing hospital car parks.

A transport and access report and an access and mobility report will be submitted with the EAR.

4.2 Interface issues

The development is unlikely to present any interface issues, other than the potential matter of perception.

Existing hospital buildings are somewhat removed from the proposed development with the nearest active medical use being the Palliative Care facility. The houses on the opposite side of Avoca Street will be separated from the proposal by the road reserve (four traffic lanes and footpaths) and an intended boundary setback of 8 metres.

Randwick Council has endorsed this area of the campus as a Mental Health Precinct and is supportive of the proposal

4.3 Operational noise

An acoustic impact assessment will be undertaken for the EAR into potential impacts from plant and equipment on the acoustic amenity of residents on Avoca Street. The EAR will propose measures to mitigate any noise if required.

4.4 Stormwater management

Stormwater run-off from the proposed building will be detained on site. A stormwater management plan will accompany the EAR.

4.5 ESD

Health Infrastructure will identify opportunities for Environmentally Sustainable Design in the design, construction, finishing and fit-out of the proposed building including compliance with NSW Health Environmental initiatives, the BCA and state government policy.

4.6 Geotechnical conditions

Geotechnical investigations of the site will be undertaken to inform detailed design and reported in the EAR. Given the extent of development on the Campus, no unexpected conditions are expected.

4.7 Tree removal

Wherever possible the trees within and around the site will be retained to provide screening. The removal of other trees will be in accordance with Randwick City Council's tree removal policy. This will be covered in the EAR.

4.8 Construction impacts

Prior to construction, and in accordance with a current consent, the existing building on the site will have been demolished, the swimming pool filled, and the site cleared of other structures related to the existing building.

The construction of the building will take place over an approximate 16 month period with all activities to be confined to the site area. There will be no impacts on existing pedestrian paths or hospital operations. Nevertheless, construction will generate noise, dust and traffic with the impacts extending beyond the confines of the development area. Access arrangements for construction related vehicles - potentially via the Vera Adderley car park - will be dealt with through a construction traffic management plan.

A Construction Management Plan will be prepared to manage and mitigate the impacts of construction. This will include sub-plans in relation to construction traffic, noise and air quality.

5.0 CONSULTATION

Randwick City Council officers were briefed on the project on 17 June 2010 and DoP officers were consulted on 18 June 2010. Randwick Council has endorsed the location of the project through the aforementioned master plan principles document.

The SESIAHS Corporate Communication Team has been an active participant in the development of the proposed new facility to ensure that staff and other stakeholders are kept informed about the key components of the project and any implications for service delivery. This will continue.

We trust that the foregoing information is sufficient to assist in determining that the project falls under Part 3A of the EP&A Act and to enable you to issue your requirements for the preparation of the necessary Environmental Assessment.

As indicated above, this project is being treated as a high priority by NSW Health and the SESIAS for the management of acutely ill adult mental health patients. Accordingly, we look forward to your early response as Health Infrastructure is seeking to secure project approval by the end of this year in order to commence construction as programmed.

Should you have any queries or require further information, please do not hesitate to contact me on 9409 4927 or vgoldschmidt@jbaplanning.com.au.

Yours sincerely

Vivienne Goldschmidt
Associate

Attachments