



29 September 2010

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

Dear Mr Haddad

Request for Opinion under Clause 6 of State Environmental Planning Policy (Major Development) 2005 and issue of Director-General's Environmental Assessment requirements Central Coast Cancer Centre, Gosford

In accordance with Section 75B of the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979) and Clause 6 of State Environmental Planning Policy (Major Development) 2005 (Major Development SEPP), Health Infrastructure seek your opinion that the Central Coast Cancer Centre at Gosford is a project to which Part 3A of the Act applies. In addition, 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 report 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

The Central Coast project has been developed in the context of a range of policies and plans including; *A Vision for Radiotherapy – Report of the Radiation Oncology Inquiry* (Baume report); the *NSW Radiotherapy Services Strategy*; the *NSW Cancer Plan 2007 - 2010*; *NSW State Plan – A New Direction for NSW*; *NSW Health's State Health Plan – A New Direction for NSW Towards 2010*; *the Rural Health Plan*, among others.

The two major reviews of radiotherapy services in NSW published in 2009 by the NSW Audit Office and the NSW Cancer Council were also been considered. The expansion of services on the Central Coast will be a significant capital investment and results in employment opportunities, as well as contributing to the achievement of priorities in The State Plan.

The Central Coast project will contribute to achievement of:

- Fair access to health services across NSW;
- Consumers satisfied with all aspects of services;
- High quality clinical treatment; and
- Care in the right setting.

Issues of access are particularly an evident in relation to affordability of radiotherapy services.

There are 13 comprehensive Cancer Care Centres in the NSW public sector that operate within the framework of the NSW Optimising Cancer Care Model. This model consists of a networked approach utilising multidisciplinary teams linked to community-based services through formal links with general practitioners (GPs) and major regional hospitals. An Integrated Cancer Service is proposed with the development of Radiotherapy Services on the Gosford Hospital Campus and outreach services at Wyong Hospital.

An increase in cancer service demand is projected for Central Coast based on population aging, estimated increases of cancer incidence, increased survival of people with cancer and improving cancer treatment technologies. The development and implementation of integrated cancer care services and facilities at the Gosford and Wyong Hospital campuses is based on a plan to support delivery of comprehensive cancer care, based on a network service delivery model. This includes provision of specialist-networked support by the Royal North Shore Hospital Comprehensive Cancer Care Centre Sydney as the principal tertiary referral centre in the network.

The Central Coast Regional Cancer Service is achieved through the development of a comprehensive radiation therapy and associated cancer service facility at Gosford Hospital; and a satellite multidisciplinary clinic and day oncology unit at Wyong Hospital. The Central Coast region of NSW (Gosford, Wyong, and Lower Lake Macquarie, Local Government Areas) has an expanding population base that is expected to exceed 330,000 residents by 2016.

Based on accepted planning parameters, there will be a demand for two additional linear accelerators, medical oncology services and continued need to improve integrated and comprehensive cancer services. Currently more than 25% of Central Coast residents who receive radiation therapy are managed in other regions of NSW, with associated travel and accommodation issues, and dislocation from usual family and community supports during a very difficult period. There is anecdotal data from Cancer Council NSW to suggest that patients decline radiation therapy due to issues of cost and access. These issues support the need to provide equitable and affordable access to oncology services.

These issues are further impacted by the demographics of the Central Coast, including:

- The rate of private health insurance is less on the Central Coast (38%) than Northern Sydney (63%);¹
- Central Coast patients have a lower socio-economic status than the NSW average.² SEIFA (Socio-economic indices for Areas) scores, produced by the Australian Bureau of Statistics based on the 2006 Census indicating that the disadvantage is strongly evident at Gosford and Wyong:
 - Relative Socio-economic disadvantage - Gosford LGA 1012 (76th percentile)
 - Relative Socio-economic disadvantage - Wyong LGA 967 (45th percentile)
 - Education and Occupation - Gosford LGA 989 (74th percentile)
 - Education and Occupation - Wyong LGA 914 (12th percentile)

¹ Northern Sydney Central Coast Health. 2008. *Clinical Services Strategic Plan, Shaping the future of acute hospital services*

² *Ibid.*

- There is a higher mortality rate and higher rates of behavioural health-risk factors such as smoking, sun exposure and obesity;³
- High public housing rates;⁴ and
- Whilst indigenous Australians comprise only 0.8% of the NSCCAHS population, the majority reside on the Central Coast.⁵ The 2006 Census shows 8,318 Aboriginal residents in NSCCAHS. Of these, 6,415 (77.2%) live on the Central Coast with 2,627 residents at Gosford and 3,798 residents at Wyong.

These facts demonstrate a need for action to provide expanded oncology services, including radiotherapy on the Central Coast.

Connection with Health and Government Policies and Priorities

A number of policies and strategic planning documents set the framework health services in NSW, including:

- The State Plan: A New Direction for NSW articulates a set of goals and priorities for Government action. Of particular relevance to the planning and establishment of radiotherapy services are the priorities to:
 - improve access to quality healthcare,
 - improve survival rates and quality of life for people with potentially fatal or chronic illness through improvements in health care, and
 - maintain and invest in infrastructure.
- Development of these services in regional areas, in particular, is a significant capital investment and results in employment opportunities. Projects will also contribute to achievement of the following priorities:
 - jobs closer to home,
 - increased business investment in rural and regional NSW, and
 - increased business investment.
- The NSW State Health Plan – Towards 2010 which was released in March 2007. Relevant priorities include:
 - make prevention everybody's business,
 - create better experiences for people using health services, and
 - make smart choices about the costs and benefits of health services.
- The Future Directions for Health in NSW – Towards 2025. This outlines the vision, values and goals of the NSW public health system. The goals include:
 - to keep people healthy,
 - to provide the health care that people need,
 - to deliver high quality services, and
 - to manage health services well.
- The plan highlights the major challenges to NSW health care in the future. These challenges include:
 - a growing and ageing population,
 - persistent health inequalities with rural residents having a shorter average life expectancy than people living in urban areas, and
 - shortfalls and maldistribution of health staff, particularly in rural and remote areas.

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.*

- The State Health Plan Towards 2010, will guide the development of the NSW public health system to 2010 and beyond, with a commitment by the NSW Government to make the most productive use of the finite resources available for health care. The growth and ageing of the population is a major factor in driving up health costs, and this will continue to place increasing demands on health services and other human services in general and radiotherapy services in particular.
- Optimising Cancer Management – A Cancer Care Model for NSW. This provides the organisational model for the delivery of cancer care services in NSW, which comprise population health services, Cancer Units and Comprehensive Cancer Centres linked by formal networks and strategic alliances.
- A Clinical Services Framework for Optimising Cancer Care in NSW gives form to the Cancer Care Model and sets clear standards for cancer service delivery.
- The Guide for Role Delineation of Health Services is used across NSW to plan services and to provide a consistent language to describe health services. The role level of a service describes the complexity of the clinical service undertaken and the support services and workforce necessary for a defined level of care.
- The Cancer Institute of NSW has developed the NSW Cancer Plan 2001-2010 which focuses on five priorities that are most likely to improve cancer results. These are preventing cancer detecting cancer early, improving cancer services and professional education, accelerating improvement through research, and relevant data and information.
- A key policy direction for NSW Health is treatment of people closer to home. This is a particular issue for radiotherapy services for rural and regional people, where treatment is provided on an intensive basis for an extended period.
- Among potential criteria for measuring the success of the draft Radiotherapy Services Program is achievement of benchmark treatment rates, numbers of new and re-treatment courses delivered by ROTCs, operational days and age of equipment. These will be monitored in NSW Health's annual Radiotherapy Management Information System Report.
- *Towards 2010* was released in March 2007. Relevant priorities in the *NSW State Health Plan* include Strategic Direction 1 – Make prevention everybody's business, Strategic Direction 2 – Create better experiences for people using health services and Strategic Direction 5 – Make smart choices about the costs and benefits of health services.

The site

The site is legally described as DP1028293 and is located within the existing Gosford Hospital campus on Holden Street Gosford. The proposed Cancer Care Centre will be located on the eastern frontage of the existing hospital at the main building.

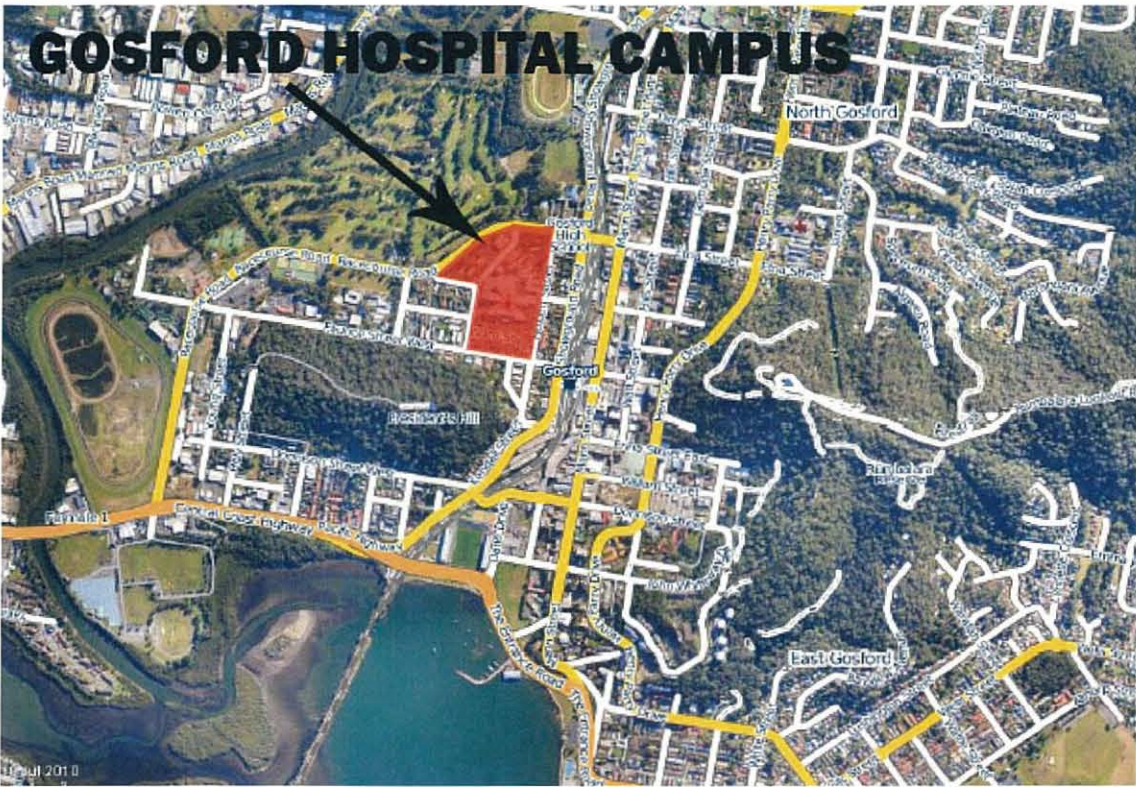


Figure 1 Site Context



Figure 2 Location of Proposed Cancer Centre

The Project

It is proposed that an integrated cancer service be established at the Gosford Hospital Campus. This development would create a critical mass development and act as the major coordinating centre. It will provide a two (2) linear accelerator machine radiation oncology unit. The development will provide:

- Integrated multidisciplinary cancer care and clinical trials facilities.
- Co-located ambulatory services providing formal multidisciplinary clinics, allowing patients to have their treatment program planned in one visit with increased access to medical oncology, radiation therapy (for both treatment & palliation), allied health & support services
- A two (2) Linear Accelerator, Radiotherapy Service
- A service delivery hub for locally delivered and rural and regional outreach cancer control and support services;
- Multidisciplinary consulting rooms.
- Waiting and Reception functions.
- Planning and support areas.
- Allied Health accommodation.
- Professional development areas for teaching, training and research.
- Cancer patient information and support services for patients, carers and clinicians.
- Office and support accommodation.
- Scope for future service expansion as population demand dictates (3rd linear accelerator, nuclear medicine and additional medical oncology capacity (day chemotherapy chairs).
- Refurbishment of existing medical oncology accommodation (day chemotherapy) to ensure capacity to meet service demand through increasing chair numbers.

The specialties accommodated in the consulting space will include:

- Radiation Oncology (for RT pre-planning and post treatment consultation).
- Medical Oncology.
- Clinical Haematology.
- Palliative Care.
- Allied Health.
- Coordination of surgical oncology; cancer psychosocial and cancer rehabilitation services with other cancer service providers in the NSCCAHS network.

Physically, the Cancer Care Centre will be a single storey structure with a GFA of approximately 2,600 square metres integrated with the existing Gosford Hospital adjacent to the existing Medical Imaging Unit and the old front entry that has been vacated following the Stage 4 redevelopment in 2004. This space is currently used as an alternative entry from the on-grade car park on the south west of the site. The new construction to ensure the possibility of the remaining space be utilised for other clinical services such as the Cardiac Catheter Unit which is impacting on the existing Medical Imaging Unit. The entry point to the Unit will be located on the south eastern end which is currently overlooking toward the Gosford CBD area. This will allow the opportunity to increase the glazed elements in the facade to introduce as much natural light into the reception area as possible.

The Primary Treatment Area, which incorporate the bunkers, will be located on the northern end of the proposed unit against the retaining wall located under the Paediatric Unit. As the bunkers do not require natural light, they could be built hard up against the existing subfloor space to the existing Paediatrics unit, located above, to enable the possibility of introducing natural light into the work areas of the Control Rooms outside the bunkers. With enhanced landscaping outside the Control Rooms windows, the work areas will be a pleasant site for future staff and specialist to work in.

The existing two-way entry road off Holden Street will be reduced to a single lane road that will lead to the main entry area with a planned drop off zone for patients. The existing car parking area immediately adjacent to the entry area for Radiotherapy will have dedicated car parking spaces for radiotherapy patients. The existing exit point from the car park on the southern side to Ward Street will remain as the exit.

Planning Issues

Strategic Planning Context

The "City of Cities – A Plan for Sydney's Future" (the NSW Government Metropolitan Strategy) is the key planning document guiding the long term growth of the Sydney metropolitan area. Ten subregions are identified across the Sydney Metropolitan Area. Gosford Hospital and the proposed Cancer Care Centre are located within the Central Coast Region. The Regional Strategy identifies that services to support population growth will need to be planned and delivered as this Regional Strategy is implemented. These services include social infrastructure, transport infrastructure, the identification of new landfill sites.

*"Gosford will be a city serving the entire Region. It will provide the Central Coast with higher-order civic and administration services, cultural and recreational facilities, medical/health specialists and services (including a major regional hospital), professional services, a regional library, regional entertainment facilities and a regional civic precinct. The revitalisation of Gosford will refocus it as the Regional City and strengthen its economic and employment significance."*⁶

The strategy includes an aim to link and grow the health precinct driven by population growth, lifestyle preferences, an ageing population and growing sophistication and complexity of services. The number of health-related jobs is forecast to increase substantially over the life of the Strategy. The Strategy also links closely with the State Plan and the proposed Cancer Care Centre is consistent with both documents.

⁶ *City of Cities – A Plan for Sydney's Future*

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	NK*	
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		

* Not Known at this stage

Local Environmental Plan

The site is currently zoned SP1 Special Activities under Gosford City Centre LEP 2007 (GLEP2007). The objectives of the zone are:

- To provide for special land uses not provided for in other zones.
- To provide for sites with special natural characteristics that are not provided for in other zones.
- •To facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land.
- To provide for development that is compatible with the special land use or uses shown on the Land Zoning Map.
- To prevent development that is not compatible with or that may detract from the special characteristics of the site or its existing or intended special use.

The Special Use identified on the Land Use Map (LUM) is Hospital.

Permitted with consent in that zone is the use identified on the LUM, including any development that is ordinarily incidental or ancillary to development for that purpose; Boarding houses; Car parks (but only as required by this Plan or public car parking provided by or on behalf of the Council or by or on behalf of the public authority that carries out the purpose shown on the Land Zoning Map in this zone); Child care centres; Community facilities; Educational establishments; Entertainment facilities; Food and drink premises; Neighbourhood shops; Places of public worship; Recreation facilities (indoor); Recreation facilities (outdoor); Residential care facilities; Roads; Seniors housing. On that basis, the use of the site for a hospital and related uses is therefore *permissible*.

Other Issues

Geotechnical

Previous investigations on site have indicated that highly weathered rock is within 1.5 to 2 metres of the ground level. Detailed investigations will be undertaken as part of the design process.

Contamination

No specific contamination studies have been undertaken at this stage.

Traffic and public transport

The small number of vehicles associated with the Cancer Care Centre should not impact on the existing road network. This was confirmed in the options analysis phase of the process but will be further reported on in the Environmental Assessment. Bicycle parking will be provided across campus as appropriate

Mechanical, electrical and other services

Detailed analysis of this aspect of the design is currently underway as it is critical to the operation of the facility. The existing electrical supply from the substation has sufficient spare capacity as does the recently upgraded backup generator. The main switchboard will be upgraded to accommodate dedicated sub mains. A new telecommunications system will be implemented throughout the proposed facility including a structured cabling system. Energy efficiency systems will also be built into the general and emergency lighting proposed.

There is an existing Council 150mm sewer main traversing the site which is available to access however a new connection is required. Stormwater will be managed via a gravity system as per the existing conditions on site. On site detention will be implemented in accordance with Council's requirements. Mains water can be supplied through existing infrastructure with some extensions to the main.

Reclaimed water will be used for irrigation and toilet flushing.

Services and medical gases will be addressed in detail in the Environmental Assessment.

Architectural design and sustainability

It is our intention to seek a high level of architectural design which incorporates environmental sustainability initiatives from design to operational phases. This will be further explored once the detailed design is undertaken. Significant ESD measures will be incorporated into the design including construction and building management, energy reduction, water conservation, waste minimization and landscape opportunities.

Consultation undertaken

Gosford City Council requested that developments at or near the Gosford Hospital take into account its key strategic planning policy – “The Gosford Challenge”. The Gosford Challenge seeks to try and integrate any future development with linkages to the town CBD. The project has managed this engagement through key members of the PDC being included on council’s working party. This has ensured linkages and understanding within the business case planning context. Both the Wyong and Gosford Shire Councils have provided significant support for the project evidenced through their respective letters of support.

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 counselling services provided by health care professionals.*

The proposed Cancer Care Centre 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 \$29.6 million and therefore meets the SEPP criteria as a major project.

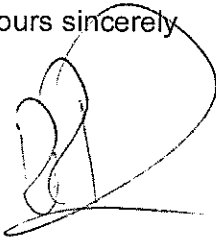
Request for Director Generals Requirements

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 our consultant Leone 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

A handwritten signature in black ink, appearing to read 'Robert Rust', written over a horizontal line.

Robert Rust
Chief Executive