

St John of God Richmond Redevelopment 177 Grose Vale Road, North Richmond

Request for Secretary Environmental Assessment Requirements (SEARs)

On behalf of
St John of God Health Care

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* This document is for discussion purposes only unless signed and dated by the Project Director.

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1 Introduction

This report has been prepared by Mecone on behalf of St John of God Health Care Inc (proponent) in relation to a proposed hospital redevelopment at 177 Grose Vale Road, North Richmond (the site).

This report requests the Secretary prepare Environmental Assessment Requirements (SEARs) to guide preparation of an Environmental Impact Statement (EIS) for a State Significant Development (SSD) application.

The proposal has an estimated capital investment value (CIV) of approximately \$40 million and therefore is classified SDD pursuant to Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) by virtue of exceeding the \$30 million threshold for hospital development.

The proposal is for the upgrade and expansion St John of God Richmond Hospital comprising demolition of a portion of the existing facilities; upgrading of existing facilities to contemporary, best-practice standards; and construction of new facilities including an increase in capacity from 88 to 112 beds.

To support the request for the SEARs, the following information is provided:

- An overview of the site and context;
- A description of the proposal;
- An overview of the statutory and strategic context; and
- An overview of the likely environmental and planning issues.

Preliminary architectural plans are provided at **Appendix 1**.

2 Background

SJGHC is a leading provider of health and community services, with hospital, home care and outreach services throughout Australia and in New Zealand.

St John of God Richmond Hospital is a private mental health hospital in the suburb of North Richmond providing comprehensive and holistic mental health care services in a tranquil setting.

The hospital currently has 88 beds; however, the standard of these facilities does not meet modern expectations, and replacement/refurbishment is required. Of the 88 beds, only 23 are single rooms, with several shared rooms having 4 beds. All bedrooms have shared ensuites. It is preferable from a care perspective to provide single rooms with ensuites for each bed.

There is also an immediate need to increase capacity to 112 beds due to demand for services.

3 Site and context

The site is located at 177 Grose Vale Road, North Richmond, and is legally defined as Lot 11 DP1134453.

The site is irregular in shape with access handle to Grose Vale Road and has a total area of approximately 9.85ha.

A site aerial map and context map are provided below.



Figure 1: Site aerial map



Figure 2: Context map

A summary description of the site is provided in **Table 1**.

Table 1 – Site description	
Item	Description
Site addresses	177 Grose Vale Road, North Richmond
Legal description	Lot 11, DP 1134453
Total area	Approx. 9.85ha
Frontages	Approx. 96m to Grose Vale Road (via access handle)
Existing use	<p>The site contains St John of God Richmond Hospital, a hospital providing mental health services with 88 beds and associated support services.</p> <p>An existing chapel on the site will be demolished as part of the development however will be incorporated into the final development.</p>
Heritage	<p>The site is identified as local heritage item under Hawkesbury Local Environmental Plan (HLEP) 2012:</p> <p style="padding-left: 40px;">St John of God Hospital (former “Belmont Park”, mansion, garden, building, gatehouse and curtilage).</p> <p>The development seeks to retain all built form of</p>

Table 1 – Site description

Item	Description
	heritage significance.
Aboriginal Heritage	There is a place of Aboriginal cultural heritage significance on the site—the Battle of Richmond Hill memorial garden, which is located to the east of Belmont House outside of the development area.
Biodiversity	Portions of the site are identified in HLEP 2012 as significant vegetation . The proposed building footprint will be located generally outside of these areas.
Existing access	The site is accessed via a private driveway from Grose Vale Road.
Context	<p>The site is located in North Richmond, in an area characterised by a mix of rural, primary production and low density residential uses.</p> <p>Development on all side boundaries are defined by rural and primary production uses.</p> <p>North Richmond town centre is located approximately 1 kilometre north east of the site and provides a mix of residential, educational and local centre uses.</p> <p>The Hawkesbury River is located approximately 155 metres south east of the site.</p>

4 The proposal

4.1 Development overview

The SSD application will seek approval for the redevelopment of the existing St John of God Richmond Hospital at 177 Gross Vale Road, North Richmond.

The SSD will generally include the following:

- Partial demolition of existing facilities;
- Upgrade retained clinical facilities to contemporary, best-practice standards;
- Construct new clinical and support facilities including increased bed capacity from 88 beds to 112 beds;
- Construct new chapel to replace the existing chapel to be demolished; and
- Integrated landscaping.

A demolition plan and indicative floor plans are provided below. Full-sized plans are attached at **Appendix 1**.



Figure 3: Proposed demolition

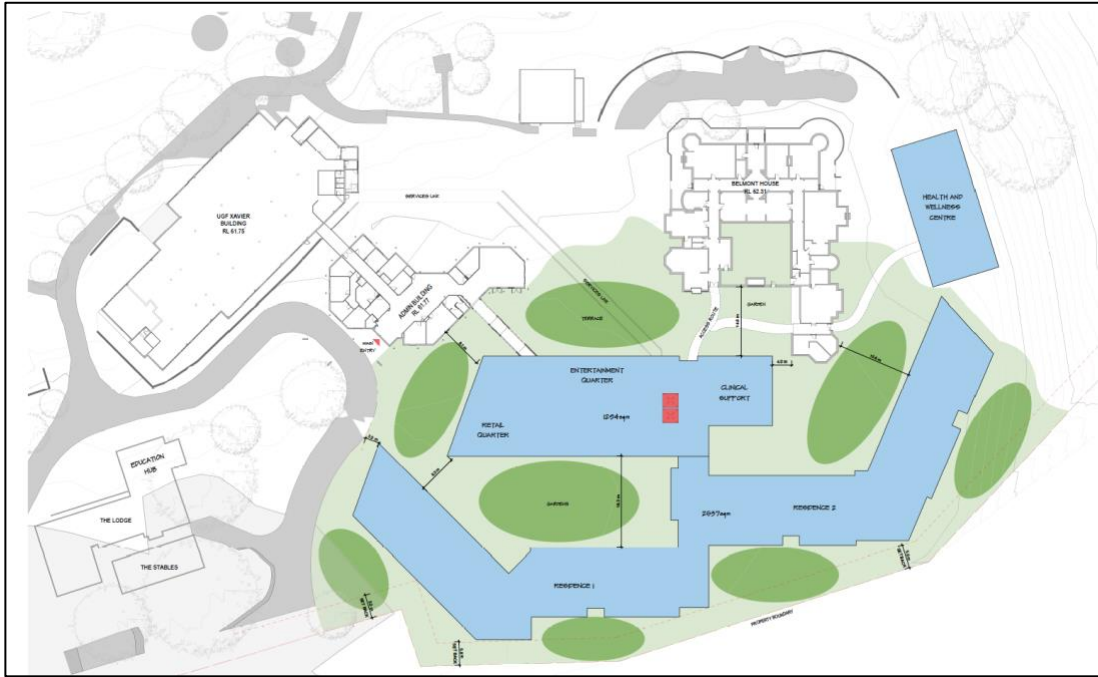


Figure 3: Proposed ground floor plan

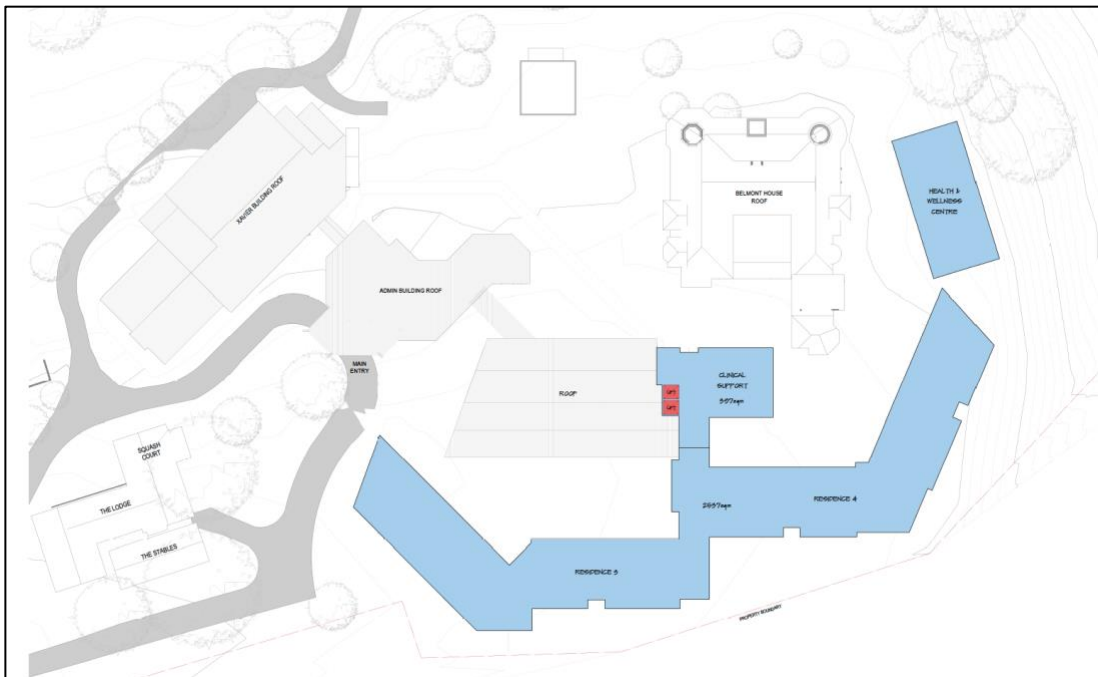


Figure 4: Proposed first floor plan

4.2 Staging

In order help manage budgeting constraints and to ensure the facility remains operable during construction works, the SSD application will seek to stage the development to allow for separate construction and operation stages. Staging details will be provided as part of the EIS.

5 Planning framework

The relevant state and local planning instruments apply to the proposal:

- State Environmental Planning Policy (State and Regional Development) 2011;
- Sydney Regional Environmental Plan No. 20 – Hawkesbury-Nepean River (No 2 – 1997);
- Hawkesbury Local Environmental Plan 2012; and
- Hawkesbury Development Control Plan 2012.

5.1 SEPP (State and Regional Development) 2011

The proposal is SSD, pursuant to clause 14 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD).

Pursuant to Schedule 1 clause 14, development for the following purposes is SSD (emphasis added):

Development that has a capital investment value of more than \$30 million for any of the following purposes—

(a) hospitals,

(b) medical centres,

(c) health, medical or related research facilities (which may also be associated with the facilities or research activities of a NSW local health district board, a University or an independent medical research institute).

The proposal relates to redevelopment of an existing hospital and has an estimated CIV of approximately \$40 million (excluding GST).

Based on the above, the proposal satisfies the requirements for SSD in accordance with clause 14 of Schedule 1 of SSD SEPP.

5.2 SREP 20 – Hawkesbury-Nepean River (No 2 – 1997)

Sydney Regional Environmental Plan No. 20 – Hawkesbury-Nepean River (No 2 – 1997) (SREP 20) provides objectives to protect the environment of the Hawkesbury-Nepean river system.

The site is located approximately 150m north west of the Hawkesbury-Nepean river.

The proposal relates to redevelopment of the existing hospital and does not propose any works that are anticipated to impact the health of Hawkesbury-Nepean river system. Nonetheless, relevant considerations of SREP 20 will be addressed in the EIS.

5.3 Hawkesbury LEP 2012

Hawkesbury Local Environmental Plan (HLEP) 2012 is the principle planning instrument that applies to the site. The following key provisions apply:

Table 2 – Hawkesbury Local Environmental Plan 2012

Control	Provision	Compliance
Zone	<p>The site is zoned RU1 Primary Production. Under the RU1 Primary Production zone, the following types development are permitted with consent:</p> <p><i>Animal boarding or training establishments; Aquaculture; Boarding houses; Boat sheds; Building identification signs; Business identification signs; Camping grounds; Caravan parks; Cemeteries; Centre-based child care facilities; Charter and tourism boating facilities; Community facilities; Correctional centres; Crematoria; Dual occupancies (attached); Dwelling houses; Educational establishments; Entertainment facilities; Environmental facilities; Extractive industries; Farm buildings; Flood mitigation works; Food and drink premises; Forestry; Funeral homes; Health consulting rooms; Helipads; Heliports; Home-based child care; Home industries; Hospitals; Intensive livestock agriculture; Intensive plant agriculture; Jetties; Landscaping material supplies; Moorings; Open cut mining; Places of public worship; Plant nurseries; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Registered clubs; Respite day care centres; Roads; Roadside stalls; Rural industries; Rural supplies; Rural workers' dwellings; Tourist and visitor accommodation; Truck depots; Veterinary hospitals;</i></p>	<p>A hospital is a type of development permitted with consent in the RU1 Primary Production zone.</p> <p>The proposal relates to redevelopment of an existing hospital including construction of new facilities, refurbishment of existing areas and new beds.</p> <p>The proposal is therefore permissible with consent.</p>

Table 2 – Hawkesbury Local Environmental Plan 2012

Control	Provision	Compliance
	<i>Water recreation structures; Water storage facilities</i>	
cl 4.3 – Height of buildings	The site has a maximum building height of 10 metres , marked 'K' on the Height of Buildings Map.	The proposed hospital works will be two storeys in height with a pitched roof. Given the higher than normal floor to floor heights for hospitals and the topography of the site, it is expected that there will be exceedance to the height of building control, which will be addressed as part of a clause 4.6 variation under the HLEP.
cl 4.4 – Floor space ratio	None adopted.	NA
cl 5.10 Heritage conservation	The contains a local heritage item identified as: 1412 – St John of God Hospital (former "Belmont Park", mansion, garden, building, gatehouse and curtilage). Additionally, there is a known place of Aboriginal cultural heritage significance on the site (Battle of Richmond Hill monument).	A heritage impact assessment will support the proposal and outline potential impacts and mitigation measures on the existing heritage item. A separate Aboriginal heritage report will be prepared to identify potential impacts on the monument.
cl 6.1 Acid sulfate soils	The site is located on class 5 acid sulfate soils land and is within 500 metres of class 1, 3 and 4 land	It is anticipated an assessment of the proposal against the provisions of clause 6.1 will be undertaken during preparation of the EIS.
cl 6.2 Earthworks	The consent authority must consider the likely disruption of, or any detrimental effect on, existing drainage patterns and soil stability in the locality.	The proposal will involve minimal earthworks. This clause will be addressed during preparation of the EIS.
cl 6.4 Terrestrial	Parts of the site are identified as containing significant	Impacts on significant vegetation will be clarified

Table 2 – Hawkesbury Local Environmental Plan 2012

Control	Provision	Compliance
biodiversity	vegetation.	<p>following preparation of detailed architectural drawings.</p> <p>We note the footprint of new buildings will be generally situated in existing developed areas on the site.</p> <p>An ecological assessment will be submitted with the application to outline potential impacts and mitigation measures.</p>
cl 6.7 Essential services	The consent authority must be satisfied that adequate arrangements have been made for essential infrastructure to service the development.	<p>The proposal relates to redevelopment of an existing hospital facility.</p> <p>Preliminary Power, Water and sewer investigations have identified that the authority supplies contain sufficient capacity to serve the development, further submissions are to finalise details.</p> <p>Infrastructure and servicing requirements to accommodate the redevelopment will be further addressed during preparation of the EIS.</p>

5.4 Hawkesbury DCP 2002

Pursuant to clause 11 of the SRD SEPP, development control plans do not apply to proposals considered State Significant development. Nonetheless, the proposal will have regard to the relevant controls of Hawkesbury Development Control Plan 2002 where appropriate.

5.5 Other planning policies

In addition to the above, the following policies and legislation apply to the site and will need to be considered as part of the SSD application:

- Greater Sydney Region Plan;
- Western City District Plan;

- State Infrastructure Strategy 2018-2038;
- NSW State and Premier Priorities;
- Future Transport Strategy 2056; and
- Better Placed.

The EIS will provide a comprehensive assessment against all the relevant strategic plans and statutory provisions.

6 Overview of likely environmental planning issues

Based on our preliminary environmental assessment, the following environmental assessment issues will likely need to be considered as part of the future SSD:

- Architecture and built form;
- Heritage (European and Aboriginal);
- Traffic, transport and parking;
- Tree removal/retention;
- Biodiversity impacts;
- Ecologically sustainable development (ESD);
- Soil and water;
- Social and economic impacts;
- Infrastructure servicing and utilities;
- Accessibility, fire safety and BCA compliance;
- Waste management;
- Geotechnical;
- Structural engineering; and
- Crime Prevention through Environmental Design (CPTED).

A description of some of the key issues that will need to be addressed is provided below.

6.1 Architecture and built form

The EIS will detail how the proposed built form presents a suitable outcome of the site in consideration of its wider context and its relationship to the heritage item on site. Consideration will be made to the overall site layout, building configuration, location of internal amenity, landscaping and materials and finishes.

The EIS will include an assessment of the impacts of the proposed development on surround land uses.

6.2 Heritage

The EIS will be accompanied by a heritage impact assessment, prepared in accordance with the guidelines of the NSW Heritage Manual, to address potential impact on the site's heritage item.

The EIS will also be accompanied by an Aboriginal heritage impact assessment to address potential impacts on the Aboriginal memorial garden on the site and to identify potential for the discovery of Aboriginal objects during construction works. This assessment will be prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW).

6.3 Traffic, transport and parking

A traffic impact assessment will form part of the EIS and will address issues relating to impacts on the existing road network and parking, arrangement of on-site parking, potential delays and peak traffic movements generated by the proposal and details of any linkages to existing and planned public transport.

6.4 Biodiversity

The EIS will be accompanied by a biodiversity report to identify the impact of any vegetation removal required to facilitate the construction of the new building and appropriate mitigation measures to minimise its impact.

6.5 Ecological sustainable development (ESD)

The EIS will detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated into the design and ongoing operation of the development. This will include measures to implement and minimise the consumption of resources, water and energy.

6.6 Services and utilities

The EIS will address how the proposed development can be adequately serviced by utility and service provider provisions. This will include an analysis of existing capacity and any augmentation requirements needed to service the development.

6.7 Soil and water

The EIS will address relevant erosion, sediment and stormwater management controls during construction and management and mitigation measures for the prevention of potential water quality impacts during construction.

6.8 Waste management

A waste management plan will be submitted with the EIS to detail the management and monitoring of the waste generated during construction and operation of the development.

6.9 Construction management

A preliminary construction management plan will be submitted with the EIS and will detail key management and mitigation measures used during construction. This will address all relevant measures including construction traffic, noise, vibration, soil erosion, dust control, staging and protection works.

7 Consultation

During preparation of the EIS, we anticipate consultation will be undertaken with the following stakeholders:

- Hawkesbury Council;
- Department of Planning, Industry and Environment;
- Roads and Maritime Services;
- Service providers;
- Surrounding landowners;
- Local Aboriginal stakeholders; and
- Local diocese.

8 Conclusion

The purpose of this document is to request the SEARs for the preparation of an EIS for the redevelopment of the St John of God Richmond Hospital at 177 Gross Vale Road, North Richmond.

It includes a description of the site, an overview of the proposed development and an outline of what are considered to be the likely environmental issues for assessment of the SSD application.

We trust that the information detailed in this document is sufficient to enable to Secretary to issue the SEARs. Should you have any queries about this matter, please do not hesitate to contact me on 02 8667 8668 or acoburn@mecone.com.au.

Appendix 1:
Preliminary Architectural Drawings