

22nd November 2011

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

Dear Mr Haddad,

**Prince of Wales Comprehensive Cancer and Blood Disorder Clinic
Request for Director Generals Environmental Assessment
Requirements Development Application**

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), Health Infrastructure request the issue of Director Generals Environmental Assessment Requirements (DGRs) for the Comprehensive Cancer and Blood Disorder Clinic (CCBDC) at Prince of Wales Hospital at Randwick. The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the DGRs to be issued.

Background

The proposed Comprehensive Cancer and Blood Disorder Centre (CCBDC) will provide a full range of services in this speciality including:

- Adolescent and Young Adult (AYA) Services in partnership with the Sydney Children's Hospital
- Allied Health Services
- Breast Cancer Care Services
- BreastScreen Services
- Cancer Genetic Services
- Cancer Outreach Team
- Cancer Registry
- Clinical Trials
- Community and Outreach Services
- Diagnostic and interventional imaging provided by medical imaging and nuclear medicine services on site (including PET CT)

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- Gynaecological Oncology Services
- Haematology – malignant and non-malignant blood disorders
- Inpatient services.
- Integrated ambulatory services including chemotherapy, apheresis, infusions, biopsies, minor procedures and others.
- Medical Oncology Services
- Palliative Care Services
- Pathology Services provided by South Eastern Area Laboratory Services
- Patient and Carer Support Services
- Pharmaceutical Services provided by the POWH Pharmacy Department
- Radiation Oncology Services
- Surgical Cancer Services; and
- Thalassaemia Services

The Randwick Hospitals campus offers all the facilities and expertise needed to treat adult and paediatric patients with cancer through the co-location of major tertiary centres including the Prince of Wales Hospital (POWH), the Royal Hospital for Women (RHW) and the Sydney Children's Hospital (SCH). The possibilities for the development of the campus are further enhanced through the proximity of major teaching and research facilities, including the University of NSW, the Lowy Cancer Centre, Children's Cancer Research Institute and a number of other basic and clinical research institutes.

Within the POWH however there is significant service fragmentation which restricts the ability to deliver a comprehensive service to the public. Evidence of this fragmentation includes:

- The medical oncology, Statewide Cancer Genetics Service and radiation oncology departments are colocated and yet the three departments operate separately.
- Chemotherapy for medical oncology is administered in the Oncology Day Centre, while chemotherapy for haematology is administered in the haematology short stay unit of the haematology ward, which is in a different building on the hospital campus (the Parkes Building).
- Medical oncology and haematology clinics are run from four different locations within the public hospital.

The benefits of this project are:

- Increased access, appropriate treatment options and self-sufficiency for tertiary level cancer services for people living in SESIAHS.
- Relocation of services from multiple separate sites and across three hospitals (POWH, SCH and RHW) into one location.
- Improved use of existing resources through collocation and the ability to share resources.
- Improved identity for Cancer Care and Blood Disorder Services to promote community identification and philanthropy.

- Ability to implement the recommendations of the Blueprint Report and to meet the expectations of the NSW Cancer Plan.
- Provide a facility which promotes the recruitment, retention and training/education of staff with an appropriate mix of skills and experience relating to cancer and haematology services.
- Sufficient facilities to enable all practitioners to operate at maximum levels of efficiency. The lack of consultation, waiting and treatment spaces currently limits the activities of clinicians.
- Ability to expand supplementary services in accordance with State and National directives such as clinical trials and other research.
- A purpose built facility which provides treatment to the target population from across the SESIAHS catchment.
- Enable the provision of services for up to 30,000 patients in an ambulatory setting each year.
- Ability to conduct more than 50 clinics per week.

The Project

The project will locate all the cancer services within one building which consist of one (1) level below ground and eight (8) levels above (nine levels in total). Level one, which is below ground and will link into the existing level 1 of the main hospital building, will incorporate four (4) radiotherapy bunkers, the below ground link, and associated plant.

At Level 1 the building will be irregular in shape with a western wing extending to the High Street frontage and the eastern wing extending to the Avoca Street frontage. A floor space of approximately 3220sqm is proposed at this level.

Level 2, which is at natural ground level, will provide the main entrance to the facility, the meet and greet area, reception, waiting area and treatment spaces for chemotherapy, blood transfusion and apheresis. The existing eastern wing of the Institute of Oncology building is to be demolished to accommodate the proposed new Centre. Above ground, the building will be divided into a northern wing which will extend to the High Street frontage, and a southern wing which will be oriented in an east-west direction. A central lift core is proposed. The ground floor will have an approximate floor area of 1,100sqm.

The level 3 building footprint will be generally consistent with that of level 2, and will have an approximate floor area of 1,100sqm. It is anticipated each level above that will have a GFA of approximately 1,100sqm with the exception of Level 4. At this level the southern wing will extend towards Avoca Street creating a building overhang over the entrance to the centre below. An approximate floor area of 1,240sqm is proposed for Level 4.

Levels 5 through 9 will be flexible space for use as clinical and/or administration functions. The overall GFA of the proposed building will be 12,660sqm.

Access to the development is proposed via the existing Avoca Street gate. A patient drop off area will be located at the front of the centre adjacent to the Blacket Building and a landscaped forecourt will also be provided.

Setbacks to the Edmund Blacket building and the remaining western wing of the Institute of Oncology will be approximately 6 metres. A zero frontage is proposed at the northern frontage to High Street. A screen is proposed at this frontage to provide shading as well as light access to the building. The building itself will be set back behind this screen. At Level 1, the building is proposed to extend to the Avoca Street frontage below the existing car park.

Schematic drawings of the proposed CCBDC are attached.

The work will be carried out in two stages to ensure that therapy services can continuously operate during the construction of the new facility. The way in which it will be staged is shown indicatively on Drawings SK 0106 and SK0107. The first stage is the construction of the new bunkers at level 1 so that they can be brought on line to allow the demolition of the existing bunkers and the rest of the development to proceed. In the interim, a temporary connection between the two facilities will be constructed.

Approval, however, is sought for the whole development.

The locality

The locality in which the Hospital Campus is located characterised by a mix of residential, commercial and retail uses with a number of medical centres and doctors' offices located in the vicinity of the hospital. There are also a number of licensed venues and hotels within the vicinity of the Hospital. The hospital and the university have been identified in the Metropolitan Strategy as an Education and Health Specialised Precinct.

To the north of the Hospital Campus, on the northern side of High Street and western side of Avoca Street is the Randwick local town centre which includes the Royal Randwick Shopping Centre. Directly to the north of the site on the northern side of High Street is a two storey commercial building with ground floor retail uses with an adjoining eight storey office building.

To the east of the development site and on the other side of Avoca Street, is heritage-listed High Cross Park. Randwick Lodge (a State-listed heritage item) is located diagonally across from the development site, at the junction of Avoca Street and Belmore Road.

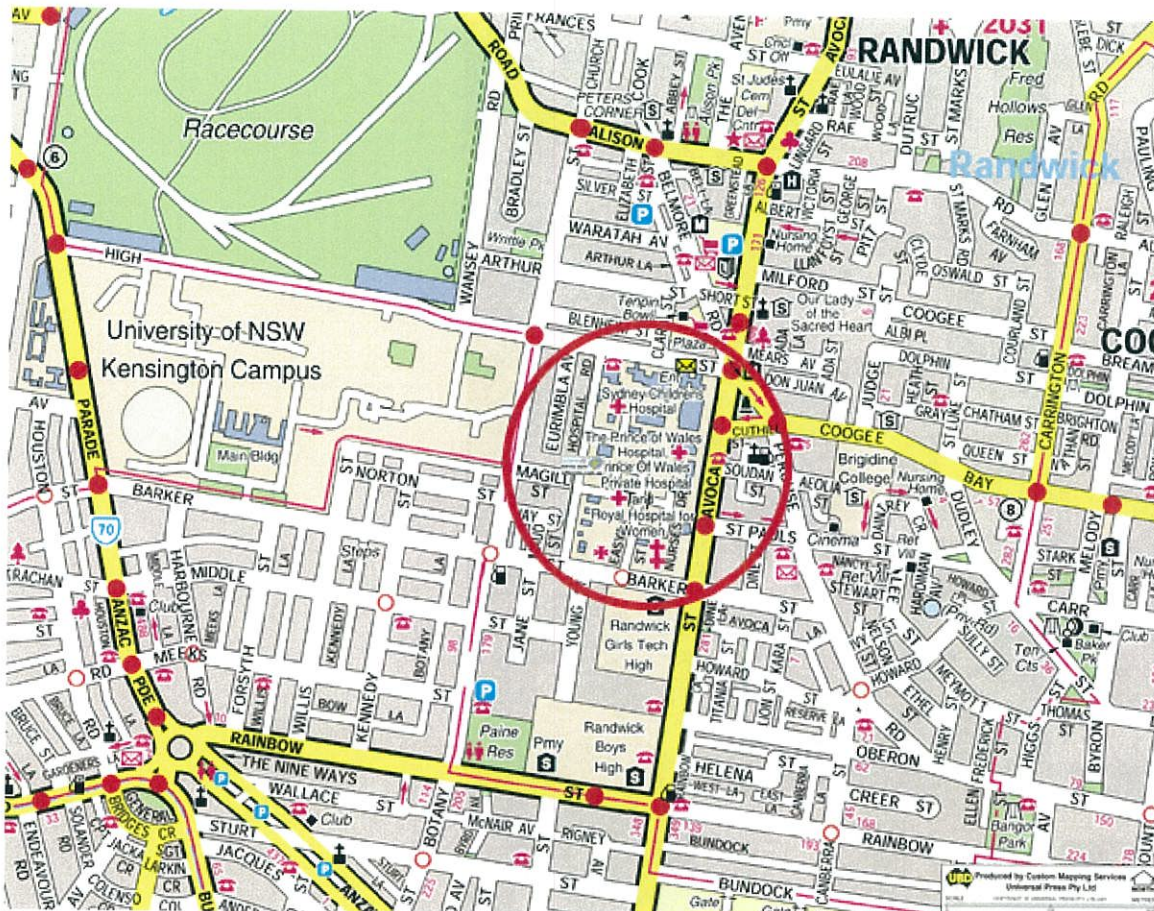


Figure 1 Local Context (Source POWH website)

The site

The Centre is proposed to be located in the Prince of Wales Hospital Campus in Randwick. The Hospital Campus is approximately 14 hectares in area and is bound by High Street to the north, Avoca Street to the east, Barker Street to south and Hospital Road to the west.

The development site selected for the Centre is in the north-eastern corner of the Hospital Campus at the junction of High and Avoca Streets. It is proposed to demolish the eastern wing of the existing two to three-storey Institute of Oncology building to accommodate the new Centre. The Centre will sit to the east of remaining wing of the Institute of Oncology building, to the north of the two-storey heritage-listed Edmund Blacket Building, and to the east is the two-storey heritage listed Superintendent Cottage. It will have a primary street frontage to High Street, and will also be seen from Avoca Street.

The site is already highly developed for hospital purposes and the proposed development will utilise the existing links to both the radiography and main hospital building. The site is

visually open with views into the site from both Avoca and High Streets. The fence located along the Avoca Street frontage is an item of local heritage significance.



Figure 2 Site Context

Physically the site slopes away from the High and Avoca Street corner towards the south west. A staff car park exists on the Avoca Street frontage between the existing Radiotherapy bunkers and the street adjacent to the Medical Superintendents Building. Access to this car park is off Avoca Street.

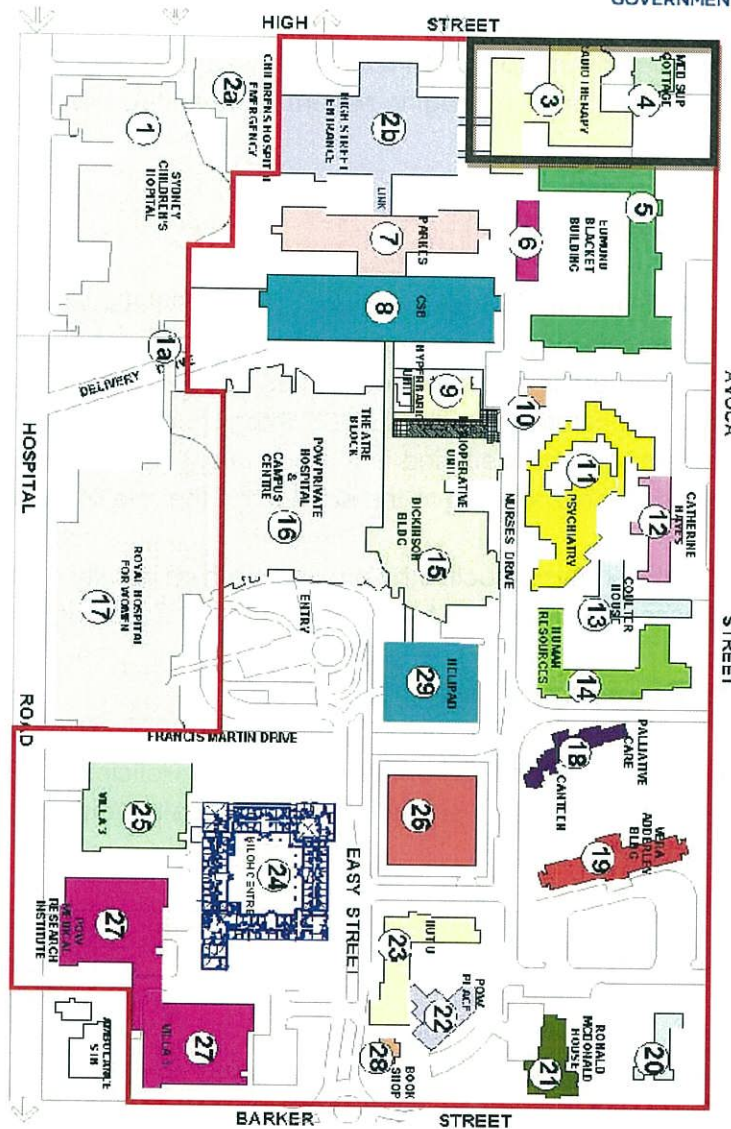


Figure 3 The site

Strategic Planning

NSW 2021

The project is consistent with the health goals contained in NSW 2021. These are:

Goal 11: Keep people healthy and out of hospital.

"By focussing on illness prevention, we can reduce the burden of chronic disease on the health system and keep our community active and healthy"

Goal 12: Provide world class clinical services with timely access and effective infrastructure.

"Our goal is to restore confidence in the public health system by rebuilding hospitals and health infrastructure, re-engaging medical practitioners, and giving communities and health care providers a strong and direct voice in improved patient care."

While it may be specifically related to emergency departments, the project aims to fulfil one of the key actions of this Plan by improving patient journeys and access to care, including redesigning clinical processes, better managing patient flows and resolving unnecessary treatment delays.

Metropolitan Plan for Sydney 2036

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. The Prince of Wales Hospital is located within the East Subregion and within the Education and Health Specialised Precinct. Actions identified in the document aim to maximise the Precinct as a research and health delivery area and to the strengthen the role of State Infrastructure”¹

This proposal is consistent with this objective by providing a high quality outcome for the delivery of Cancer and associated services for the Precinct and East Region.

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	✓	No development standards apply to the site.
33	Hazardous and offensive development	Not known	
55	Remediation of land	✓	Preliminary site testing will be conducted during the assessment of the project to ascertain any levels of contaminants on the site. A phase 1 Assessment will be submitted with the EIS
	State and Regional Development	✓	The proposal accords with the requirements of the SEPP for State Significant Development under the class of hospital medical centres and health research facilities.

¹ East Draft Subregional Strategy, 2008

Local Environmental Plan

Randwick Local Environmental Plan 1998

Randwick local Environmental Plan 1998 (Randwick LEP) is the primary EPI controlling development on the Hospital Campus.

Under the Randwick LEP, the hospital campus is zoned "Zone 5 –Special Uses". The objectives for the zone are:

- (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.*

A hospital is a permitted use in the zone and is defined as:

...a building or place used for providing professional health services (including preventative care, diagnosis, medical or surgical treatment or counselling) to people and includes:

- (a) *ancillary facilities for the accommodation of nurses or other health care workers, ancillary shops or refreshment rooms and ancillary accommodation for persons receiving health care or for their visitors, and*
- (b) *facilities situated in the building or at the place and used for educational or 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,*

The proposed Centre can therefore be described as a building providing professional health services and is therefore permissible with development consent in the zone.

Clause 37A of Randwick LEP, requires the consent authority to be satisfied that the proposed development is compatible with the character of the locality and will not adversely affect the amenity of nearby and adjoining development, before granting consent

Clause 40A of the LEP restricts a consent authority from granting consent to an application made in respect of a site area consisting of more than 10,000m² of land unless a site specific DCP for the development on that land is prepared.

Clause 40A(4) allows the consent authority to waive the requirement for a DCP where it is satisfied:

- (a) *that the proposed development is of a minor nature only or is ancillary to the current use of the land, or*
- (b) *that adequate guidelines and controls applying to the land are already in place.*

The proposal is situated on a small parcel of the Hospital Campus, and does not consist of an area more than 10,000 m². The Hospital Campus has an existing Masterplan for development of the site, however this it understood not to have been formally adopted by Council. A waiver of this provision will be sought as part of the application.

Heritage Conservation

The Randwick LEP similarly requires the consent authority to consider the effect of the proposed development on the heritage significance of the heritage item or heritage conservation area development within a heritage conservation area or in the vicinity of a heritage item. A Conservation Management Plan (CMP) for the Hospital Campus was prepared by Graham Brooks and Associates in August 1997.

The part of the Hospital Campus in which the Centre is to be located is within the High Cross Heritage Conservation Area. As mentioned earlier the Edmund Blacket Building and the Medical Superintendents Building are both listed on the State Heritage Register.

Hospital Masterplan

The Randwick Health Campus Masterplan was prepared by Cite Urban Strategies in September 2008. The Masterplan was prepared in consultation with Council. The proposal is largely consistent with this masterplan.

Randwick Education and Health Specialised Centre Discussion Paper

The Specialised Centre discussion paper has been prepared by Randwick City Council to assist in developing appropriate planning controls for the Randwick Education and Health Specialised Centre which includes the Hospital Campus, University of New South Wales Campus and Royal Randwick Racecourse.

The discussion paper identifies the future land use zoning for the Hospital campus as SP2 - Health Services Facility. In relation to the High Street (east) end of the Hospital Campus the discussion paper sets out the following aims:

*Open High Street frontage of the Health Campus and link to circulation network.
Reinforce the cluster of health and medical related uses at the east end. Link the forecourt of the Health Campus's Avoca Street frontage to High Street.*

The proposal is consistent with this aim.

Other Issues

Services

Initial consultation with service providers has indicated services are available.

Consultation

A meeting has been held with Randwick City Council and a copy of the minutes from that meeting are attached.

Request for Director Generals Requirements

The Capital Investment Value of the proposal is \$47,250,185.00 and a quantity surveyor's certificate verifying this is attached. On the basis that the proposal falls within the criteria identified in Clause 14 of Schedule 1 of the State and Regional Development SEPP, Health Infrastructure formally request that the Department of Planning issue the Director General requirements (DGRs) to facilitate the preparation of the Environmental Impact Statement to accompany the development application for the proposal.

If you require any additional information please contact David Bedingfeld on 9978 5458 or Leoné McEntee on 0410 432 505. We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely
Health infrastructure

A handwritten signature in black ink, appearing to be "Rust", written over the printed name.

Robert Rust
Chief Executive

