

23 September 2013

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

Dear Mr Haddad,

Request for Director Generals Environmental Assessment Requirements for the State Significant Development Application - Community Health Facility at Mona Vale Hospital

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 (HI) request the issue of Director Generals Environmental Assessment Requirements (DGRs) for the development of a consolidated Community Health Facility at Mona Vale Hospital. 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 Mona Vale Community Health Centre (CHC) will be located on the Mona Vale Health Campus and will be one of three future community health service hubs across the Northern Beaches Health Service. These centres will bring together a critical mass of services, workforce, technology and resources to serve as a base from which the services are delivered or outreached from.

The Mona Vale CHC will become the hub for aged care, rehabilitation and chronic disease management programs. These services will complement the sub-acute rehabilitation services to be provided on the Mona Vale Health Campus, and will facilitate the continuum of care for patients towards an improved level of function. Collocation of inpatient and community services will provide opportunities for improved integration and collaboration across services, along with a range of operational efficiencies.

The NSW State Plan, 'NSW 2021' identifies a need to "Renovate Infrastructure" as a way of achieving its goals for the State. Investment in critical infrastructure and providing world class clinical services with timely access and effective infrastructure are two key goals of the Plan.

The State Plan states:

"The NSW Government will build the infrastructure that makes a difference to both our economy and people's lives. Infrastructure also underpins improvements in many services, such as roads, rail, hospitals, schools or utilities.

Infrastructure NSW has been established to provide independent expert advice, and ensure projects are strategically planned, coordinated and properly managed to restore community confidence.

A 20 year State Infrastructure Strategy with funded five year plans, will make sure infrastructure is planned and delivered according to strategic economic and community needs.

A clear long-term infrastructure strategy will improve NSW's productivity and competitiveness, deliver sustainable growth and support employment, by matching infrastructure with development to attract people, jobs and investment."

The coordinated delivery of Community Health Care meets the objectives of the NSW State Plan.

The Project

The Mona Vale CHC will bring together a range of community health services currently provided across the district in a purpose built facility. The building will be up to three storey on height and have a gross floor area of approximately 4000m² located within the Mona Vale Hospital campus. Space for future expansion will also be included. Preliminary plans are attached.

The primary health planning principles behind the development are described below: of the proposed development are to:

Be client centred

- Optimises the experience for clients and carers.
- Promotes client self -management and health independence.

Provide ease of access

- Highly visible site with good public transport and client parking/drop off areas.
- Access and way-finding will meet the specific needs for all people attending the centre.
- Client ease of access and connection to the various service areas they may attend.

Enable best practice care

- Facilities support the delivery of contemporary models of care.
- Services organised around the needs of the client.

Provide an age appropriate environment

An environment that meets the needs of children and families as well as older clients and carers.

- A child and family friendly environment
 - Waiting and client treatment areas designed to meet the needs of young children and their families
- An aged friendly environment
 - Promotes of safety and ease of access to services for the older people, including consideration of varying mobility levels and use of walking aids/ wheelchairs/ electric scooters.
 - Design and furnishings to meet the NSW Ministry of Health Policy: *Fall Injury Among Older People*. This includes: non-slip floor coverings, and appropriate signage, colour and contrast for way finding and orientation, including well signed toilets.

Allow facilitates integration and a multidisciplinary approach

- Provision of spaces that encourage formal and informal collaboration between service providers.
- Shared staff office areas and amenities across service areas.
- Staff ease of access and connection to the different service areas they may work across.

Facilitates Integration with Sub-Acute Services

- Ease of staff movement between inpatient and community services.
- Sharing of space, support areas and resources between existing and new facilities where appropriate.

Zonal Approach

- Shared main entrance / 'front of house' zone.
- Client interface zone incorporating shared, flexible use assessment/treatment/therapy areas; as well as some dedicated service specific areas.
- Shared staff zone including office space and staff amenities.
- Shared 'back of house'/ support areas.

Separation of Flows

- Promotes staff and client security
- Separation of the movement of public, staff, clients/consumers, and goods and services.
- Separation of front of house from back of house services.

Flexibility and Adaptability

- Purpose built facilities designed for flexible use and that can be easily adapted over time.
- The ability to expand and contract service provision, e.g. shutting down areas after hours.

Optimise Staff Experience

- Provision of shared staff facilities and amenities, including staff lounge; access to café; access to appropriate outdoor space, showers/lockers.
- Emphasis on staff safety and security.
- Promote opportunities for clinical leadership and supervision.
- Access to information technology, such as wireless capability

Enable operational efficiencies

- Services will be planned and designed to optimise operational efficiencies.
- Centre based client consultations will be delivered in flexible use, purpose designed spaces. Offices will not be used for client consultations.
- Sharing of space resources across a range of services, including other sub-acute, health information and support services on the Mona Vale Health Campus.
- Optimal utilisation and minimal duplication of services and infrastructure.

The scope of services to be provided include:

- Rehabilitation & Aged Care Services
- Musculoskeletal physiotherapy
- Chronic Care Services
- Community Nursing and APAC
- Child & Family Services
- Maternity Clinic
- Midwifery Clinic
- Adult Mental Health
- Child & Adolescent Mental Health
- Drug & Alcohol Services
- HIS & support services
- Other services to be confirmed by the Local Health District

Site Context and Location

The Mona Vale CHC will be located within the existing Mona Vale Hospital site on the south eastern portion of the site adjacent to the existing Community Health Building and accessed off Coronation Street which is situated off Pittwater Road. Pittwater Road is a major arterial road that provides links between Narrabeen, Collaroy, Brookvale, and Manly to the south. At Mona Vale shopping centre to the north of the site the arterial road branches off to become Barrenjoey Road to the east that provides links up to the northern beaches suburbs (eg. Palm Beach); and becomes Mona Vale Road to the west (that provides links to Ingleside, Terrey Hills and beyond).

The Mona Vale shopping centre is located approximately 1.5 kilometres north of the site and contains the Pittwater Place Shopping Centre and various other shops and businesses.

Figure 1 shows the site locality map for the Mona Vale Hospital

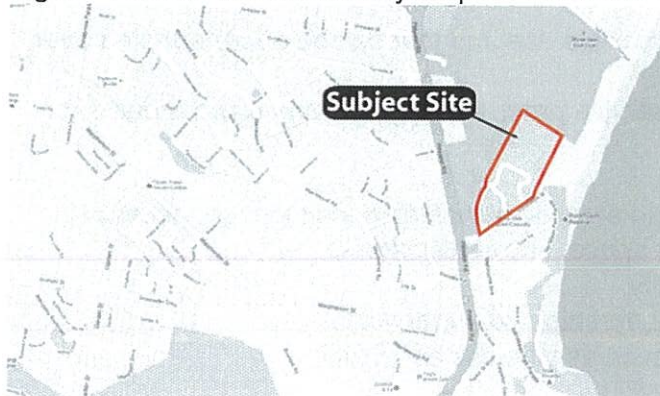


Figure 1 - Locality Plan

The site is located on Coronation Street Mona Vale within the existing hospital site. The site is surrounded by Mona Vale Golf course to the north, residential development to the south east, Pittwater Road to the west.

The land is legally described as Lot 1, DP 439092.

Contamination

Health Infrastructure commissioned Environmental Investigation Services (EIS) to undertake a preliminary contamination assessment for the proposed Community Health Centre development at Mona Vale Hospital, Coronation Street, Mona Vale. The objectives of the preliminary contamination assessment are to assess the potential risk for widespread soil contamination at the site and provide a preliminary waste classification for the off-site disposal of soil excavated for the development.

At the time of the preliminary contamination assessment, the site was occupied by the Mona Vale Hospital, comprising of a number of brick buildings. Around the buildings were driveways and parking areas and grassed landscaped areas. An electrical sub-station was located on the south eastern side of the existing building.

Fieldwork for this investigation was undertaken on 23 July 2013. The guidelines recommend sampling from a minimum of seven evenly spaced sampling points for the proposed development area of up to 2,000m² for a Stage 2 ESA.

Based on the scope of work undertaken, EIS provide the following conclusions:

- Elevated concentrations of contaminants were not encountered in the soil samples analysed for the investigation. All results were below the SAC adopted for this assessment.
- Based on these results, EIS are of the opinion that the potential for wide spread contamination at the site is relatively low; and
- EIS consider the risk posed by contamination to the receptors to be low.

Fill material at the site is classified as General Solid Waste (non-putrescible). Natural sand and sandstone bedrock at the site is classified as Virgin Excavated Natural Material (VENM).

Traffic

The main site access will be via Coronation Street. Based on the review and analysis of local government parking rates, similar case studies, the first principles approach and current rates on the Mona Vale Hospital site, it has been determined that an additional 25 spaces is the minimum requirement to cater for parking demand at the Community Health Centre. Twenty (20) relocated spaces are also required to account for those lost as a result of construction of the Community Health Centre and reconfiguration of access.

The proposed development is considered to have a minimal impact on the surrounding road network, with an increase in traffic of approximately 1% forecast at the intersection of Pittwater Road / Coronation Street.

Strategic Planning

NSW State Plan 2021

The NSW State Plan – NSW 2021 contains 32 Goals for the State. In terms of health services the key goals are:

- Keep people healthy and out of hospital.
- Provide world class clinical services with timely access and effective infrastructure.
- Invest in critical infrastructure.

This project comprehensively meets these goals.

The State Infrastructure Strategy – “First Things First”

The State Infrastructure Strategy “First Things First” is an assessment of priority infrastructure problems and solutions for the next two decades for the NSW Government, the community, business and all who have an interest in the success of NSW.

The report indicates that NSW’s health system faces growing demand from an ageing population, lifestyle diseases and new care technologies. This will require new models of care, including more beds in smaller, specialist medical facilities and repurposing community health centre. The Mona Vale CHC meets these outcomes.

Legislation

Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The provisions of the Commonwealth EPBC Act come into effect where the proposed works is development that takes place on or affects Commonwealth land or waters or where the development is carried out by Commonwealth agencies. In addition, where the development is a matter considered to be of National environmental significance; the provisions of the Act come into force. No critical habitats or nationally listed threatened species have been found to occur on the site.

Rural Fires Act 1997

The requirement to obtain a Bushfire Safety Authority under s100B of the *Rural Fires Act 1997* is triggered by works that involve the subdivision of land or a special fire protection purpose. At this stage this is not considered to be the case for this site.

Contaminated Land Management Act 1997

The subject land is not subject to any declarations, orders, or voluntary management proposals, as defined in the Act. Further investigations on the status of the site have been referred to above

Roads Act 1993

The proposed works does not involve widening of a road or creating access from a Classified Road and therefore a Roads Act approval under s138 is not likely to be required.

Statutory Planning

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	✓	✓
33	Hazardous and offensive development	NK*	
55	Remediation of land	✓	✓
	Infrastructure 2007	✓	✓
	State and Regional Development	✓	✓

* Not known at this stage

State Environmental Planning Policy (State and Regional Development) 2011

The aims of the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) are:

- (a) to identify development that is State significant development,
- (b) to identify development that is State significant infrastructure and critical State significant infrastructure,
- (c) to confer functions on joint regional planning panels to determine development applications.

Schedule 1 of the SRD SEPP provides a list of development categories that are considered to be State Significant Development (SSD). Clause 14 of Schedule 1 deals with hospitals, medical centres and health research facilities and states that development that has a capital investment value of more than \$30 million for any of the following purposes is considered to be SSD:

- (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 Community Health Centre proposed as part of Mona Vale Hospital is considered to meet these criteria on two accounts. Firstly, the definition of a hospital within the Standard Instrument states (emphasis added):

hospital means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following:

- (a) **day surgery, day procedures or health consulting rooms,**
- (b) **accommodation for nurses or other health care workers,**

- (c) accommodation for persons receiving health care or for their visitors,
- (d) shops, kiosks, restaurants or cafes or take-away food and drink premises,
- (e) patient transport facilities, including helipads, ambulance facilities and car parking,
- (f) educational purposes or **any other health-related use**,
- (g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),
- (h) chapels,
- (i) hospices,
- (j) mortuaries.

Mona Vale Hospital is a hospital facility which cares for inpatients. The Community Health Service is an ancillary health related use that forms part of the hospital.

Alternatively, the Community Health Service could be fall within the definition of medical centre which means premises that are used for the **purpose of providing health services (including preventative care, diagnosis, medical or surgical treatment, counselling or alternative therapies) to out-patients only, where such services are principally provided by health care professionals**. It may include the ancillary provision of other health services.

On that basis, the proposed facility is considered to SSD based on Schedule 1 of the SRD SEPP and the CIV of the project being in excess of \$30million.

Local Environmental Plans

The subject site is zoned Zone No 5 (a) (Special Uses "A") under Pittwater Local Environmental Plan 1993 (LEP 1993). Under this LEP the surrounding areas are zoned:

- Zone No 6 (a) (Existing Recreation "A") – land to the north, east and west of the site; and
- Zone No 2 (a) (Residential "A") – land south over Coronation Street.



Figure 2 Zoning Plan

The proposed use is permissible with consent.

Capital Investment Value

The Capital Investment Value of a project is defined in the *Environmental Planning and Assessment Regulation 2000* as follows:

capital investment value of a development or project includes all costs necessary to establish and operate the project, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment, other than the following costs:

- a) amounts payable, or the cost of land dedicated or any other benefit provided, under a condition imposed under Division 6 or 6A of Part 4 of the Act or a planning agreement under that Division,
- b) costs relating to any part of the development or project that is the subject of a separate development consent or project approval,
- c) land costs (including any costs of marketing and selling land),
- d) GST (within the meaning of A New Tax System (Goods and Services Tax) Act 1999 of the Commonwealth).

Based on that definition, the CIV of the Mona Vale Hospital CHC is approximately \$38 million in total.

Request for Director Generals Requirements

On the basis that the proposal falls within Clause 14 of Schedule 1 of the SRD SEPP and has a Capital Investment Value of approximately \$38 million, Health Infrastructure formally request that the Department of Planning and Infrastructure issue the DGRs for the new Community Health Centre at Mona Vale Hospital to facilitate the preparation of the Environmental Impact Statements to accompany the infrastructure applications for the proposal.

If you require any additional information please contact Leoné McEntee on 9978 5420 or 0410 432 505. We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely
Health Infrastructure



Sam Sangster
Chief Executive