

13 January 2015

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally,

**Request for Secretary's Environmental Assessment Requirements for the
redevelopment of Gosford 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) requests the issue of Secretary's Environmental Assessment Requirements (SEARs) for the redevelopment of Gosford Hospital including Stage 1 of the "Health and Wellbeing Precinct".

The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued.

Gosford Hospital (GH) is located within the Central Coast Region of New South Wales (NSW). It is located within the catchment of the Central Coast Local Health District (CCLHD), which extends from Wyong in the north to Woy Woy in the south. The CCLHD provides public health services to the Central Coast region, a growing and ageing population expected to reach 355,000 by 2022.

The area is served by two acute hospitals – Gosford and Wyong – two sub-acute facilities and ten community health centres in addition to other community based services.

GH is the principal referral hospital and regional trauma centre for the Central Coast. It also provides a comprehensive range of secondary level services including maternity, paediatrics, mental health and some complex and tertiary services including interventional cardiology and cancer.

The Clinical Services Plan for CCLHD 2012-2022 identifies that Gosford is currently operating at its physical capacity and *"while there is the potential to create some capacity through improved efficiency in the management of patient flow within the hospitals this will only have a limited effect in meeting the demand"*.

The Locality

Gosford Hospital (GH) is located within the Gosford Local Government Area (LGA). A location plan of the site is below.

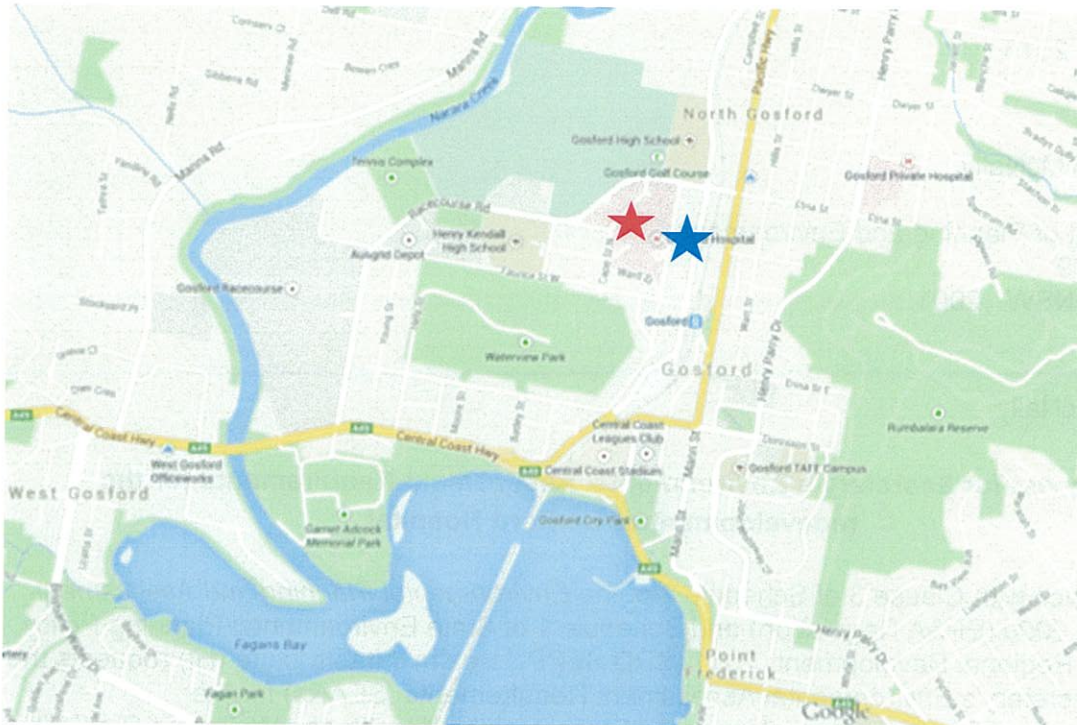


Figure 1 Location Plan - Approximate location of proposed works shown by the red and blue stars

The Site

The proposed redevelopment relates to two (2) sites:

1. The existing Gosford Hospital site and Hospital Road; and
2. Land to the east of the existing hospital including 66-78 (incl) Showground Road, 33 & 39 Beane Street West, 77-87 (incl) Holden Street and part of Holden Street, and the Beane Street West road reserve. This "site" is known as Stage 1 of the proposed "Health and Well Being Precinct".

The land is legally described as follows:

Gosford Hospital (land owned by HAC)

- Lot 1 DP 1076023
- Lot 101 DP 1034362
- Lot 1 DP 246244 (Hospital Road)
- Lot 100 DP 1028293

Proposed Health and Wellbeing Precinct (note all relevant landowners are in the brackets below)

- Lots A and B DP 316723 (HAC)
- Lot C DP 316723 (NSW Aboriginal Land Council)
- Lot 1 DP 157518 (HAC)
- Lot B DP 160507 (HAC)
- Lot 1 DP 996187 (HAC)
- Lot 1 DP 163187 (HAC)
- Lots 31 and 32 DP 1074996 (Brocore Investments No. 2)
- Lots 5, 6 and 7 DP 503890 (Land and Housing Corporation)
- Lot 1 DP 1050222 (Herald)
- Lots 8 and 9 DP 503890 (HAC)

HI NSW has made contact with all non-HAC landowners and acquisition discussions are underway. In addition, the development proposed in the Health and Wellbeing Precinct will include the closure of part of Holden Street, and Beane Street West. These roads are under the ownership of Gosford City Council who we are in discussions with. A site plan showing the indicative location of both sites is below.

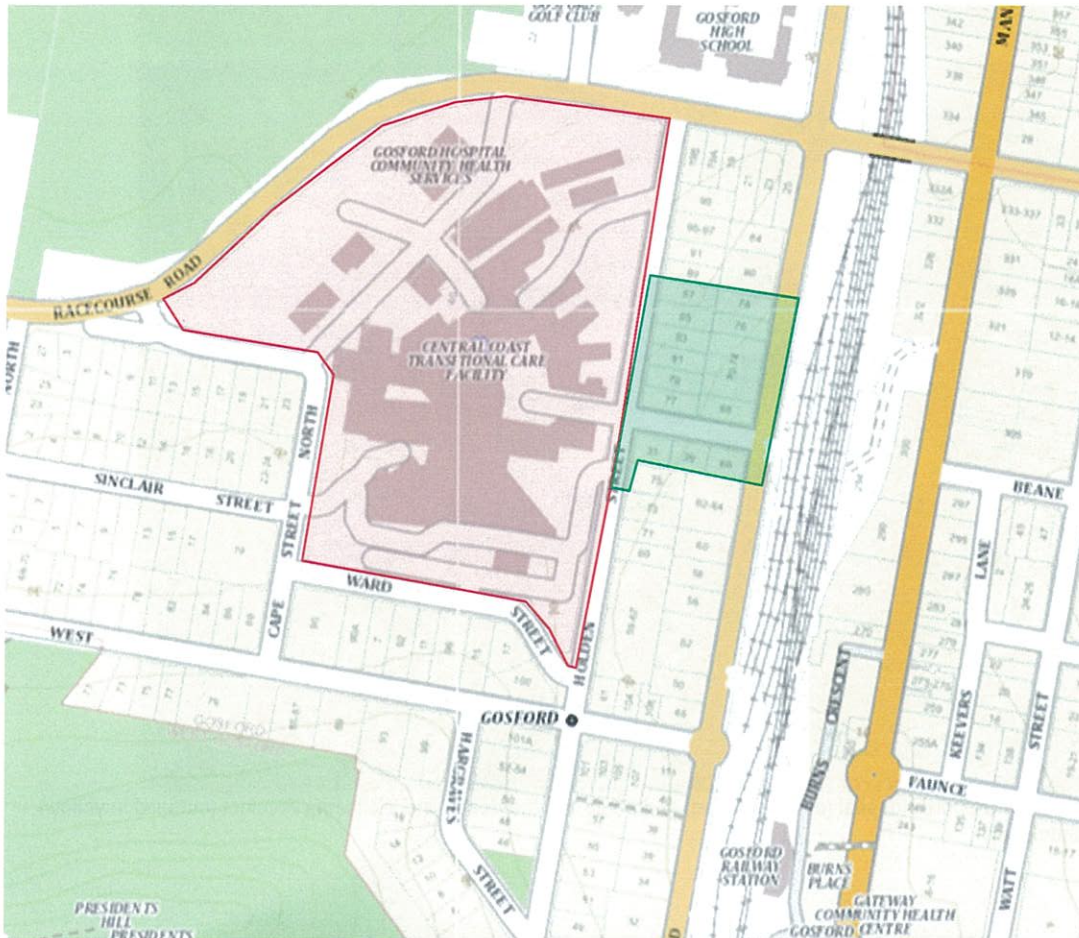


Figure 2 Site Plan, existing Gosford Hospital outlined and shaded in red, proposed Stage 1 of the Health and Wellbeing Precinct in green

The sites are located wholly within the Gosford LGA and are zoned a mix of SP2 Infrastructure (Health Services Facility) and B4 Mixed Use under the Gosford Local Environmental Plan 2014 (GLEP). An aerial view of the sites and an extract from the zoning map are provided over.



Figure 3 Aerial View of Gosford Hospital (outlined in red) and Stage 1 of the Health and Wellbeing Precinct (outlined in yellow)
(Source: SIX Landviewer)



Figure 4 GLEP Zoning Map Extract. Sites collectively indicatively outlined in red (Source: GLEP)

The sites are characterised by a variety of existing buildings and structures of varying condition. Existing buildings at GH include a range of hospital-related uses including general medicine, general surgery, obstetrics, gynaecology, paediatrics, aged care, rehabilitation and psychiatry services. Existing buildings in the proposed Health and Wellbeing Precinct include residential uses. The following plans show the general outline of the existing buildings on the sites.



Figure 5 Existing Layout of Gosford Hospital and Health and Wellbeing Precinct (and surrounding land), sites collectively outlined indicatively in red (Source: Fitzpatrick + Partners)

The Project

The Gosford Hospital and Health and Wellbeing Precinct Redevelopment (the "Redevelopment") consists of a staged development under Section 83B of the EP&A Act as follows:

- A concept proposal for the redevelopment of GH (refurbishment and new build), Stage 1 of the Health and Wellbeing Precinct (including two (2) sub-stages known as Stages 1.1 and 1.2) to the east of the existing GH and a new connection/entry node from the Health and Wellbeing Precinct to the existing GH from Showground Road; and
- The detailed proposal for the following:

1. Redevelopment of the existing Gosford Hospital

- Demolition of existing buildings (education building, Harry Mattlocks building, ICT building, maintenance buildings and pathology/ambulatory care) and the existing fleet parking within the footprint of the redevelopment site;
- Tree removal;
- Site preparation works;
- Major and minor refurbishment works to existing buildings comprising approximately 8,700m² of existing gross floor area;
- New eleven (11) level building works that will "link in" to the refurbished existing hospital areas (listed above);
- A new helipad is proposed at Level 11 of the proposed new building;
- Services relocation and the closure of Hospital Road;
- Soft and hard landscaping; and
- Staged demolition/construction of all of the above to allow the hospital to remain in operation during the redevelopment.

2. Stage 1.1 of the Health and Wellbeing Precinct

- Demolition of all existing buildings and structures within the footprint of the redevelopment site;
- Tree removal;
- Site preparation works including bulk excavation;
- Road and public domain works;
- Construction of a new multi-storey carpark, covered pedestrian link between the Precinct and main hospital entrance and other ancillary health-related training/education uses and retail shops for the hospital;
- Soft and hard landscaping;
- Closure of Beane Street West;
- Closure of part of Holden Street (with the closed portion of Holden Street to accommodate appropriate access for emergency and service vehicles only).

The Health and Wellbeing Precinct comprises two (2) buildings above Stage 1.1 (as above). These low-rise buildings will comprise health-related, administration/office and government uses. The detailed design of these buildings will be subject to a future Stage 1.2 Development Application.

The following figure is a plan of the proposed redevelopment, for which consent is sought. Consent is sought for the redevelopment of the main hospital including Stage 1.1 of the Health and Wellbeing Precinct (carpark, shops/education spaces at the ground floor and pedestrian connection to the existing hospital).



Figure 6 Proposed Concept/Masterplan for the Redevelopment including Stage 1.1 of the Health and Wellbeing Precinct (Source: Fitzpatrick + Partners)

The following figure is a plan of the Redevelopment including Stage 1.2 of the Health and Wellbeing Precinct (the details of which will be subject to a future stage Development Application).

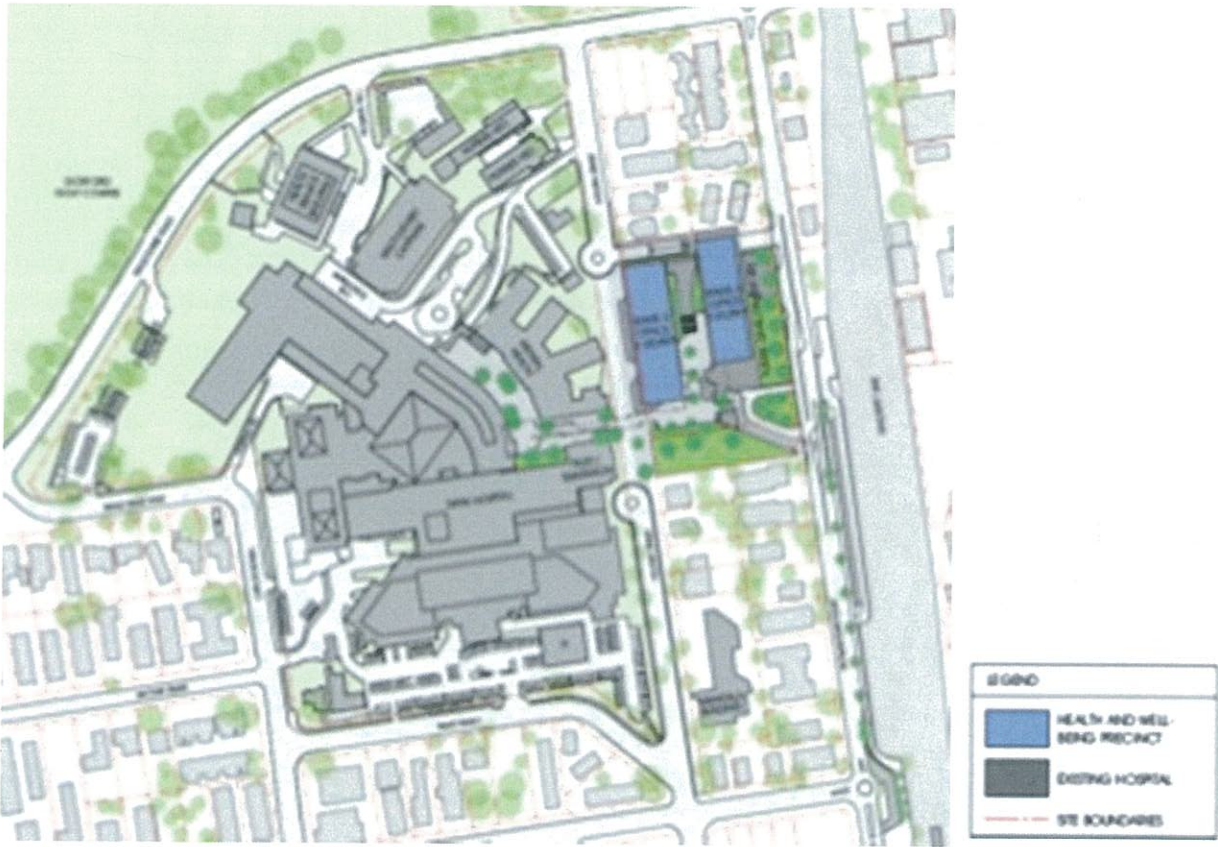


Figure 7 Proposed Concept/Masterplan for the Redevelopment including Stage 1.1 of the Health and Wellbeing Precinct and future Stage 1.2 Health-related administration/offices (Source: Fitzpatrick + Partners)

The following are some architectural perspectives of the proposed redevelopment.

Figures 8 and 9 demonstrate 3D views of the proposed main hospital redevelopment.



3 Aerial View East

Figure 8 Aerial View East of the Proposed Redevelopment of the Existing Hospital (Source: Jacobs)



Figure 9 North West and North East Perspectives of the Proposed Redevelopment of the Existing Hospital (Source: Jacobs)

Figures 10, 11 and 12 below demonstrate 3D views of the proposed Health and Wellbeing Precinct development.

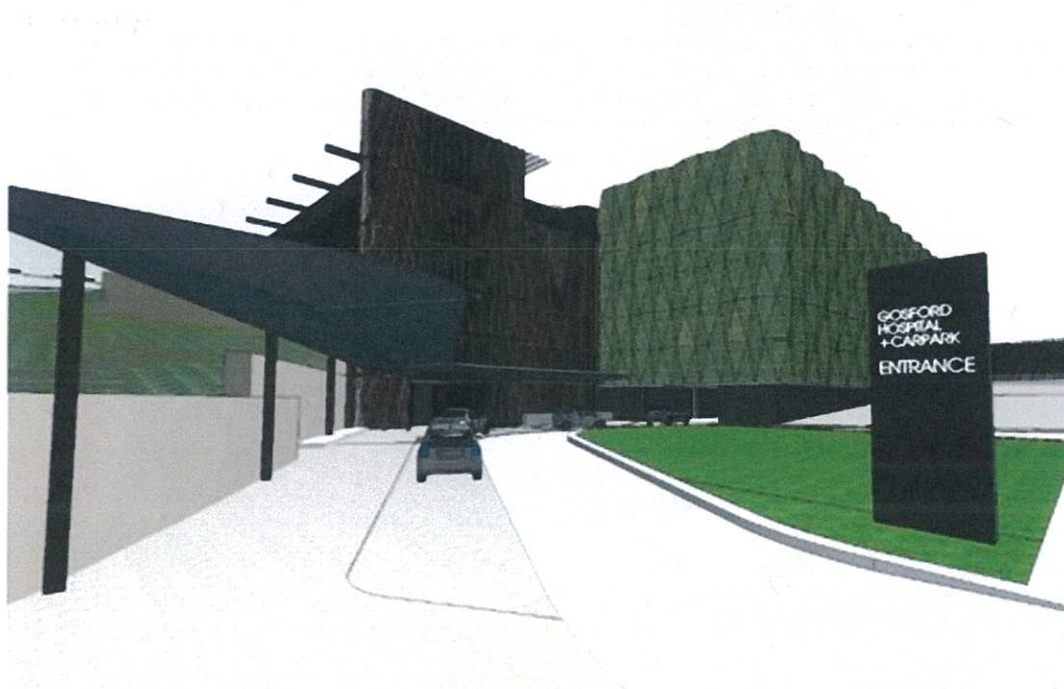


Figure 10 3D view of the main entrance from Showground Road to Stage 1.1 of the Health and Wellbeing Precinct (Source: Fitzpatrick + Partners)

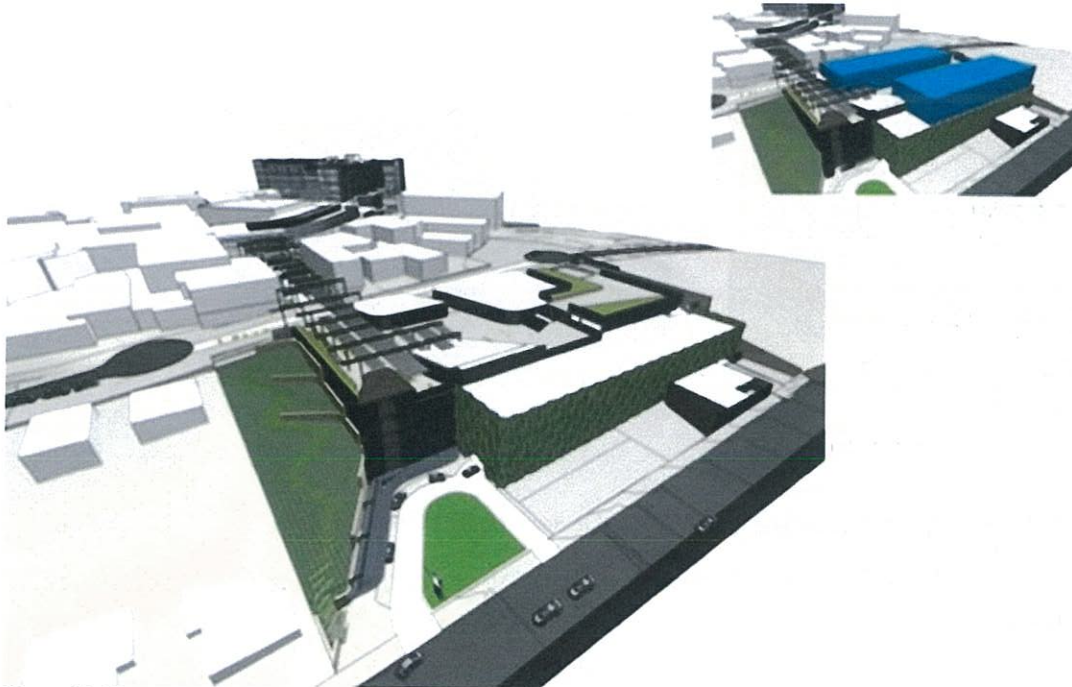


Figure 11 3D aerial view of the proposed Stage 1.1 Health and Wellbeing Precinct and main hospital redevelopment in the background. This is an aerial view taken from the south-east looking north-west. The image in the right-hand corner of the above shows the conceptual "massing" of the Stage 1.2 health-related administration low-rise building envelopes above the Stage 1.1 Health and Wellbeing Precinct (in blue) (Source: Fitzpatrick + Partners)

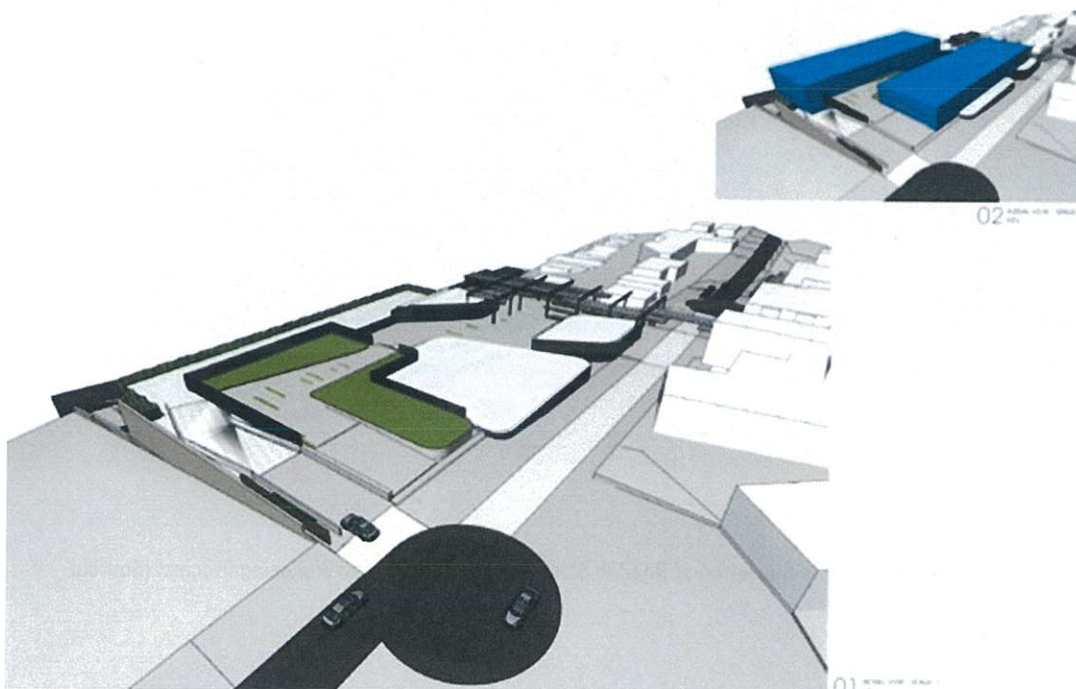


Figure 12 3D aerial view of the proposed Health and Wellbeing Precinct. This is an aerial view taken from the north-west looking south-east. The image in the right-hand corner of the above shows the conceptual "massing" of the Stage 1.2 envelopes above the Stage 1.1 Health and Wellbeing Precinct (in blue) (Source: Fitzpatrick + Partners)

Strategic Planning

NSW State Plan

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 Project is consistent with the direction of the State Plan.

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 Strategy builds on the NSW Government's existing public commitments and outlines a forward program of more than 70 urban and regional projects and reforms across a range of portfolios including health.

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 community health centres. The redevelopment of GH is identified as a major hospital upgrade and therefore the proposal is considered to be consistent with the Strategy.

Gosford City Centre Masterplan

The "Our City Our Destiny" Masterplan proposes a strategic plan for the Gosford City Centre, to encourage development for a wide range of uses, including business, government, retail, cultural, educational and recreational activities. It identifies five (5) key precincts of activity with one of those being the "Hospital Precinct".

The following extracts from the Masterplan shows the location of the Gosford Hospital Precinct and the proposed adjacent "Hospital Support Precinct", which is the location of the Health and Wellbeing Precinct proposed for this Project.

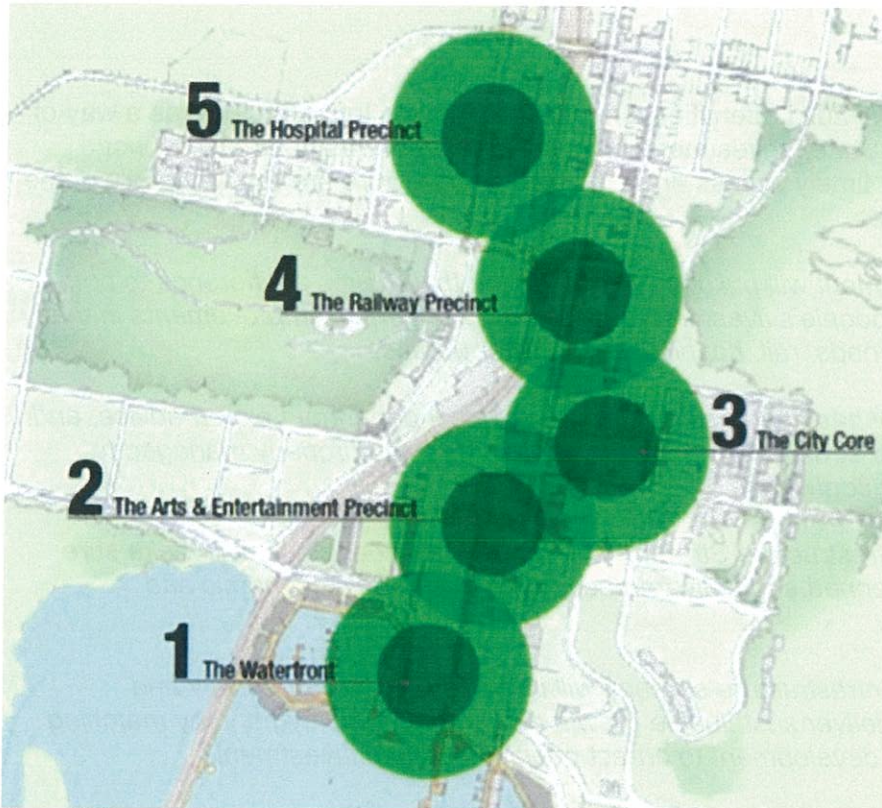


Figure 13 Five (5) Precincts in the Gosford City Centre Masterplan (Source: Our City Our Destiny Masterplan)

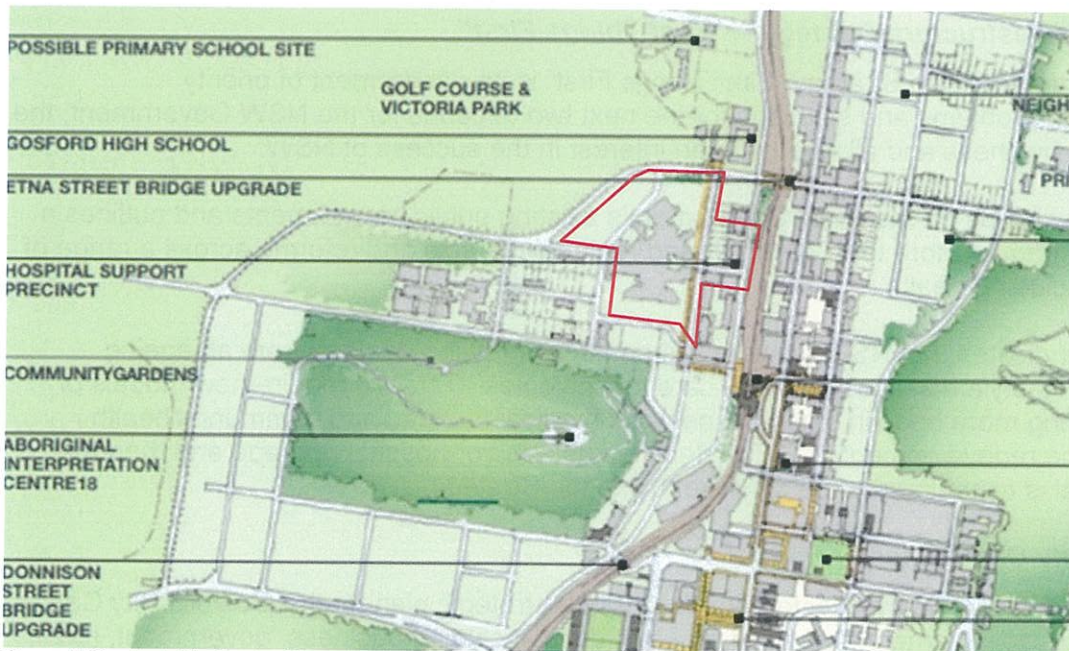


Figure 14 Gosford City Centre Masterplan, sites collectively outlined in red (Source: Our City Our Destiny Masterplan)

Key initiatives for the Hospital and adjacent Support Precinct, as outlined in the Masterplan are:

- a) Expansion of health and wellbeing services;
- b) Etna Street Bridge Upgrade;
- c) Holden Street and Showground road Pedestrian Upgrades;
- d) New development along Showground Road;
- e) Gosford Public School relocation;
- f) Gosford and Henry Kendall High School oval upgrades;
- g) Racecourse Road Pedestrian Upgrade; and
- h) Railway Pedestrian Link.

The proposed development of Stage 1.1 (and future Stage 1.2) of the Health and Wellbeing Precinct will assist in achieving a) (with further expansion anticipated in the future), c) and d) and potentially in conjunction with Gosford City Council for part g). Consideration is also being given in the proposed development to improving the pedestrian accessibility from Gosford Railway Station to the proposed "entry node" for the hospital.

Whilst a hospital carpark is not a specific use envisaged in the Masterplan for the Health Support/Health and Wellbeing Precinct, lack of adequate parking is identified as a redevelopment issue and the proposed new hospital carpark will assist in addressing this issue. The provision of a dedicated carpark for GH and Stage 1 of the Health and Wellbeing Precinct will be fundamental to ensuring these uses remain accessible by all.

The redevelopment of GH is also considered to be consistent with both the State Infrastructure Strategy and the "Our City Our Destiny" Masterplan.

Planning Issues

Land Use Definition

All of the proposed land uses are wholly associated with, and supplement, the existing operations of GH. They include:

- Additional hospital facilities for various medical services including (but not limited to) nutrition, geriatric, emergency services, medical imaging, ambulatory care, general surgical, birthing/maternity, intensive care, in-patient care;
- Small retail shops for hospital users (staff, visitors, patients);
- Training/educational facilities for GH staff;
- Health/hospital-related administration/offices; and
- Other health-services facilities.

Under the Standard Instrument, the above uses fall within the definitions of a "health services facility", or more specifically, a "hospital" (which is defined as a type of "health services facility"). The relevant definitions are below:

"health services facility means a facility used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes the following:

- (a) day surgeries and medical centres,

- (b) community health service facilities,
- (c) health consulting rooms,
- (d) facilities for the transport of patients, including helipads and ambulance facilities,
- (e) hospitals."

"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.

Note. Hospitals are a type of **health services facility**—see the definition of that term in this Dictionary."

(emphasis added)

The above Standard Instrument definitions are adopted by the GLEP, as well as the State Environmental Planning Policy (Infrastructure) 2007 (iSEPP).

Permissibility

A "health services facility" or "hospital" is permitted in the SP2 Infrastructure (Health Services Facility) but prohibited in the B4 Mixed Use zone. Notwithstanding this, Clause 57 of the iSEPP states that "*development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone*". Both the SP2 and B4 zones are listed as "prescribed zones" under Clause 56 of the iSEPP.

Furthermore, Clause 5.12 of the GLEP states that there is nothing in the GLEP that can "*restrict or prohibit, or enable the restriction or prohibition of, the carrying out of any development, by or on behalf of a public authority, that is permitted to be carried out with or without development consent, or that is exempt development, under State Environmental Planning Policy (Infrastructure) 2007.*"

Given the development is wholly permitted under the iSEPP on the B4 zoned part of the development sites, pursuant to Clause 5.12, the GLEP no longer operates to "prohibit" the development on the land as the SSSDA will be made by a public authority.

Zone Objectives

The objectives of the SP2 zone are:

- *"To provide for infrastructure and related uses.*
- *To prevent development that is not compatible with or that may detract from the provision of infrastructure.*
- *To ensure that development is compatible with the desired future character of the zone."*

The proposed hospital redevelopment is capable of demonstrating consistency with these objectives.

The relevant objectives of the B4 zone are:

- *"To provide a mixture of compatible land uses.*
- *To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.*
- *To encourage a diverse and compatible range of activities, including commercial and retail development, cultural and entertainment facilities, tourism, leisure and recreation facilities, social, education and health services and higher density residential development.*
- *To create opportunities to improve the public domain and pedestrian links of Gosford City Centre.*
- *To protect and enhance the scenic qualities and character of Gosford City Centre."*

The proposed Health and Wellbeing Precinct development is also capable of demonstrating consistency with these objectives. Particularly, we note that the location is highly accessible and will incorporate a range of uses compatible with the adjacent hospital uses but also other surrounding uses. The proposal will also seek to undertake works to improve the public domain and pedestrian linkages, particularly from Gosford station to the main hospital entrance.

Height and FSR

There are maximum height and FSR development standards that apply to the sites under the GLEP. There are varying standards across different parts of the development sites. The maximum building heights range from 18 metres to 24 metres. The maximum FSR provisions range from 2:1 - 3:1. There will be some parts of the development, such as the proposed health-related administration towers, that will exceed these development standards.

Notwithstanding the above, and referring to Clause 5.12 of the GLEP again, nothing in the GLEP can *"restrict or prohibit or enable the restriction or prohibition of, carrying out of any development, by or on behalf of a public authority, that is permitted to be carried out with or without development consent...under State Environmental Planning Policy (Infrastructure) 2007"*. To this end, the development standards that apply to the sites under the GLEP do not apply to the proposed development as they "restrict" development permitted under the iSEPP. They will be a merit based consideration in the EIS.

Heritage

The sites do not contain any heritage items and are not listed as being located within any heritage conservation areas. The sites are however located within the vicinity of heritage items and a full heritage impact statement is currently being undertaken to assess the potential impact of the developments on these heritage items.

Site Investigations Carried Out To Date

Parking and Traffic

The parking requirements for the redevelopment have been established through the preparation of a Parking Demand Assessment undertaken by Parking and Traffic Consultants. The part closure of Holden Street and the relocation of the fleet parking will result in a loss of 200 spaces with new demand generated by the redevelopment of approximately 348 spaces. The proposed hospital carpark will greatly assist in meeting the existing shortfall, as well as the future demand for parking generated by the hospital redevelopment.

The projected traffic activity is being further analysed with reference to existing road network surveys, internal and local road network modeling, and the distribution of these activities to determine the impacts on the road network. One of the key issues that will need to be further assessed and considered relates to the proposed closure of Beane Street West, part of Holden Street and part of Hospital Road and associated impacts to vehicular accessibility and the surrounding road network.

Consultation will also be undertaken with Council and Roads and Maritime Services (RMS) with regard to the proposal in general but with a particular focus on with the closure of these roads and any impacts on the regional road network, which is already under duress.

Impacts on traffic during construction will be managed by way of an agreed Construction Management Plan.

Geotechnical

Preliminary geotechnical investigations of the sites have been undertaken by Douglas Partners. In general the ground conditions encountered comprise residual clay material over a sandstone bedrock. No significant issues have been identified in relation to slope stability or acid sulphate soils, or items that would affect the proposed development.

Site Contamination/Hazardous Materials

Douglas Partners (DP) has undertaken a detailed site investigation for contamination of the Redevelopment area within the existing GH (December 2014). Some potential contamination sources have been identified by DP, primarily comprising contaminated filling materials, leaks/spills of solvents/fuel/oil and past agricultural use at the site or in nearby areas. Soil and groundwater samples were tested for the principal potential contaminants of concern. The results of indicated that whilst some areas of site require further investigation and/or remediation, the site is generally compatible with the proposed redevelopment from a contamination standpoint. Further works will be undertaken in preparation of the EIS. A site contamination investigation is currently being undertaken for Stage 1 of the Health and Wellbeing Precinct and will be submitted with the EIS. Based on the historical use of these sites predominantly for residential purposes, it is considered that the risk for contamination is low.

Further to the above, we anticipate that some of the buildings to be demolished to facilitate the proposed development will comprise potentially hazardous materials (such as asbestos). A full hazmat survey will be prepared to accompany the EIS.

Flooding

Taylor Thomson Whitting (TTW) has undertaken a preliminary investigation of the potential for flooding on the sites. The preliminary investigations indicate that whilst there are some localised pockets of flood extent on the sites, TTW confirms that the site is not flood affected and therefore a flood study should not be required.

Acid Sulphate Soils

The preliminary geotechnical investigations undertaken by DP (dated 9 July 2014) confirms the following with regard to the development site within the existing GH:

"The local acid sulphate soil risk map indicates that the site is located in an area mapped as having no known occurrence of acid sulphate soils. The risk mapping is consistent with the site elevation and also the geological conditions."

Investigations are currently being undertaken of Stage 1 of the Health and Wellbeing Precinct site to determine if there is any potential for acid sulphate soils of concern.

Services

A preliminary review of available services has been undertaken by TTW with comments received as follows:

"The new hospital wing straddles Hospital Road. The new carpark straddles Beane Street West.

"Existing services within Hospital Road include gas services, sanitary sewer main, stormwater pits and piping, underground telecommunications infrastructure and underground electrical infrastructure according to the site survey and available Dial Before You Dig information.

Existing services within the new carpark site include water main, stormwater pits and pipes, sanitary sewer main, underground electrical and telecommunications infrastructure according to the site survey and available Dial Before You Dig information.

Services relocation and possible augmentation will be required and will be further reviewed in the EIS.

Noise

Acoustic Logic has undertaken a preliminary review of the redevelopment area and has confirmed that the potential noise impacts from the proposal relate to:

1. Construction and operational noise from traffic, particularly associated with the proposed hospital carpark;
2. Noise from mechanical plant both within the future buildings and to receivers within the proximity of the development;
3. Helicopter noise into the future development and impact to surrounding receivers. Although, we note that the Redevelopment seeks to decommission an existing helipad which is located in closer proximity to existing residential development than the proposed helipad at Level 11 of the new hospital building. Therefore, we anticipate that noise impacts are likely to be equal to, if not less than, the current scenario; and
4. Construction noise and vibration impact to surrounding sensitive receivers during the construction of the project.

Acoustic Logic confirms that the projects acoustic elements will be designed and documented to ensure a suitable acoustic amenity for future users as well as surrounding receivers.

Overshadowing

The mid-winter shadow analysis undertaken by Jacobs for the proposed new hospital works demonstrates that there will be no adverse overshadowing of existing residential development adjacent to GH. There will be a very small amount of overshadowing to approximately three (3) properties to the south of the hospital. However, these properties will enjoy full solar access from about 10:00am onwards for the remainder of the day.

A mid-winter shadow analysis is currently being undertaken by Fitzpatrick + Partners for the proposed Health and Wellbeing Precinct. We anticipate there will be some overshadowing that will result from Stage 1.1 and Stage 1.2 of the proposal, but that such overshadowing will primarily be limited to the existing hospital and Showground Road and the Gosford railway line. Any potential overshadowing issues will be addressed as the design of Stage 1 of the Health and Wellbeing Precinct progresses and will be addressed in the EIS that will accompany the SSDA.

Tree Removal

A preliminary survey/assessment of the condition of existing trees on the site undertaken by Tree IQ has indicated that there are some trees of significance that may be required to be removed. Further assessment will be undertaken to determine the level of tree removal required and as the design progresses, efforts will be made to retain as many trees as possible.

Request for Secretary's Environmental Assessment Requirements

On the basis that the proposal falls within the criteria identified in Schedule 1 of the SRD SEPP, including a CIV in excess of \$30 million, Health Infrastructure formally requests that the Department of Planning and Environment issue the SEARs to facilitate the preparation of the Environmental Impact Statement to accompany the SSD application for the Gosford Hospital redevelopment project.

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