

9 March 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 - Northern Beaches Health Service Redevelopment - Brookvale Community Health Centre

In accordance with clause 3 of Schedule 2 to 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 requests the issue of the Secretary's Environmental Assessment Requirements (SEARs) for the proposed development of the Brookvale Community Health Centre. The purpose of this letter is to provide a preliminary assessment of relevant environmental issues and supporting documentation to facilitate preparation and issue of the SEARs.

Background

The proposed Brookvale Community Health Centre is part of the Northern Beaches Health Service Redevelopment project (NBHSR). The project objectives are to deliver a health solution that:

- Provides acute and outpatient services at a new hospital at Frenchs Forest providing critical mass and optimisation of the delivery of health services across the Northern Beaches Health Service catchment;
- Retains and redefines the Mona Vale Hospital to provide sub-acute services and other health services complementary to those at the new hospital;
- Strategically reconfigures the community health services across the Northern Beaches Health Service catchment at Dalwood, Mona Vale Hospital and Brookvale; and
- Ceases the provision of health services from the Manly Hospital site.

The project has the following key outcomes:

1. Development of the new Northern Beaches Hospital at Frenchs Forest, combining public and private health care delivery so the Northern Beaches community has improved access and choices with regard to quality and sustainable health care.
2. Redesign of community health services on the Northern Beaches, with new Community Health Centres at Mona Vale and Brookvale, and enhanced child and family specialist services at Dalwood in Seaforth.

3. Redevelopment of Mona Vale Hospital and cessation of services at Manly Hospital to bring together acute health services onto one site, creating the opportunity to expand contemporary models of care, increase clinical collaboration, provide a broader range of professional opportunities, and implement sustainable service delivery. Mona Vale Hospital will provide complementary services including a 24 hour, seven day a week urgent care centre supported by easy access to diagnostic services, such as pathology and medical imaging along with sub-acute, rehabilitation, community and palliative care services.

Site description

The site of the proposed Brookvale Community Health Centre is on the eastern side of Pittwater Road, immediately to the north of the intersection of Condamine Street and Pittwater Road, Brookvale.

Brookvale is located on the Northern Beaches approximately 12 kilometres northeast of the Sydney Central Business District.

The site comprises three separate but adjoining properties: 612 Pittwater Road, 620 Pittwater Road, and 624 Pittwater Road (refer Figure 1). Existing land use on each property is summarised as follows:

Address	Existing land use
612 Pittwater Road	This parcel of land is cleared of structures. It is currently occupied by Uniflow Concrete Pumping and used as a temporary storage area for construction and building materials. The site has temporary fencing along the southern and western frontages.
620 Pittwater Road	This parcel of land contains an unoccupied brick and tile residence that is in a generally poor state. There are a number of other smaller structures on the property, mainly to the rear of the block. There is vegetation regrowth across the site but concentrated mainly in the eastern half of the site. The site has temporary fencing along the western frontage (continuing from the adjacent property at 612 Pittwater Road)
624 Pittwater Road	This parcel of land is occupied by two commercial enterprises: • Barbecues Galore (Units 1&2, 624 Pittwater Road, front of property) • Stylewise Industries (Unit 3, 624 Pittwater Road, rear of property) The northern part of the site (parking area for Barbecues Galore customers) adjoins the access to the commercial premises (Pet O) at 626 Pittwater Road (at the rear of 624 Pittwater Road). There is no dividing barrier between these two areas.

The legal property description for the site is as follows:

Address	Legal description
612 Pittwater Road	Lot A DP 375728 Lot B DP 375728 Lot C DP 375728
620 Pittwater Road	Lot 1 DP 500541
624 Pittwater Road	Lot 3 DP 539384



Figure 1: Site of proposed Brookvale Community Health Centre

The surrounding land use consists of commercial, retail and light industrial (refer Figure 2).

Warringah Mall is located to the west of the site across Pittwater Road. The site is located immediately adjacent to the signalised intersection of Pittwater Road, Condamine Street and William Street. There is a southbound bus stop in front of the properties at 612 and 620 Pittwater Road, and a northbound stop on the opposite side of Pittwater Road.

The northern side of William Street to the east of the site contains a variety of commercial enterprises with building heights of 1-2 storeys. A four-level building is located immediately to the east of 612 Pittwater Road. There are multiple mobile telephone aerials mounted on the top of this building, principally on the western and southern sides.

Sydney Buses' Brookvale Depot is located to the northeast of the site. The nearest residential properties are located on William Street to the south, with the majority of these being single storey residences. Warringah Golf Club is located immediately to the south of the intersection of Pittwater Road and Condamine Street.



Figure 2: Land use surrounding Brookvale Community Health Centre site

Access to the site is available from Pittwater Road (southbound, and is restricted to left in, left out only) and from William Street. Southbound traffic on Pittwater Road is not permitted to make a left turn into William Street.

Project description

The Brookvale Community Health Centre (CHC) will provide a range of health-related services including:

- Adult Mental Health Services;
- Allied Health Services;
- Breast Screen;
- Child & Adolescent Mental Health Services (CAMHS);
- Child & Family Health (C&FH) Services;
- Chronic Care;
- Community Nursing and Acute Post-Acute Care (APAC) Services;
- Community Drug and Alcohol Services;
- HIV/AIDS and Related Programs (HARP);
- Health Information Services;
- Multicultural Health Service;
- Oral Health Services;
- Population Health; and
- Rehabilitation & Aged Care Service.

The development would broadly comprise:

- A four (4) storey building with an approximate gross floor area (GFA) of 6,300m² located at the front of the site adjoining Pittwater Road;
- A multi-storey (six level) car park at the rear of the site, providing approximately 450 car park spaces;
- Main building entrance off Pittwater Road, and secondary entrances for the HIV/AIDS and Related Programs (HARP) Service and for Opioid Treatment Programs; and
- Site access would be from Pittwater Road (left in, left out only) and William Street (all movements).

The car park would provide 200-230 spaces to meet the needs of the CHC. The balance would be for commuter car parking; Health Infrastructure is presently consulting with Transport for NSW in this regard.

Strategic planning context

NSW 2021: A Plan to Make NSW Number One

NSW 2021 identifies a need to 'Renovate Infrastructure' as a way of achieving its goals for NSW. Investment in critical infrastructure and providing world class clinical services with timely access and effective infrastructure are two key goals of the Plan. NSW 2021 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 proposed Brookvale Community Health Centre is consistent with the direction of NSW 2021.

The State Infrastructure Strategy 2012–2032 ('First Things First')

The State Infrastructure Strategy 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 Strategy 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 Strategy notes that

Community health centres with a mix of GP, public health and private services (such as diagnostics) have potential to provide a convenient local access point to local services that facilitate integrated care.

The proposed Brookvale Community Health Centre is consistent with the Strategy.

Rebuilding NSW

Rebuilding NSW was released in June 2014 and updates the State Infrastructure Strategy. It sets out the NSW Government's plan to stimulate the NSW economy through investing \$20 billion in infrastructure. This includes \$1 billion allocated to health infrastructure, \$100 million of which will be reserved for the Care Co-location Program. This will facilitate bringing together a variety of healthcare providers to improve access to health care services and increase overall efficiency.

The proposed Brookvale Community Health Centre is consistent with the direction of *Rebuilding NSW*.

Planning issues

The subject land is zoned B5 Business Development under the Warringah Local Environmental Plan 2011 (refer Figure 3). Health Service Facilities are permitted with consent in this zone.



Figure 3: Extract from Warringah LEP 2011 zoning map 1800_COM_LZN_008A_010_20110919

Planning constraints

The Section 149 certificate for the site identified only one planning constraint, summarised as follows.

Matter	Constraint
Maximum building height	11 m
Minimum lot size	None
Land is affected by the operation of sections 38 or 39 of the <i>Coastal Protection Act 1979</i> , but only to the extent that the Council has been so notified by the Department of Public Works.	No
Land is affected by road widening/road alignment under:	
– Division 2 of Part 3 of the <i>Roads Act 1993</i>	No
– any environmental planning instrument	No

Matter	Constraint
– any resolution of Council	No
Direction by the Minister in force under Section 75P(2)(c1) of the EP&A Act that a provision of an environmental planning instrument prohibiting or restricting the carrying out of a project or a stage of a project on the land under Part 4 of the Act does not have effect.	No

Warringah Council has separately provided verbal advice that there is a development standard for building setback of 6.5 metres on Pittwater Road.

Site investigations carried out to date

Contamination

The site comprises three properties with a total area of about 5,400 m². The three properties include a former service station site at 612 Pittwater Road (removed and now vacant), former residence at 620 Pittwater Road (vacant), and commercial retail and manufacturing outlet at 624 Pittwater Road (currently operational).

Since the closure of the service station at 612 Pittwater Road in 1997, a significant amount of environmental assessment, remediation and validation work has been conducted on the site. A Summary Site Audit Report (SSAR) for 612 Pittwater Road has been prepared by an appointed NSW EPA Accredited Site Auditor. The SSAR accepted the site as suitable for commercial/industrial land use, subject to a list of conditions (based on a non-HI development proposal) to be implemented during potential site redevelopment.

Further remedial works were undertaken in the southwest corner of 620 Pittwater Road and a Site Audit Statement (SAS) was issued in 2013 to establish post remediation/validation works completed for this part of the site. The Auditor concluded that based on the information provided that hydrocarbon contamination from the adjoining former service station (612 Pittwater Road) had been remediated to the extent practicable and that 620 Pittwater Road had been remediated to a standard suitable for commercial/industrial land use with respect to petroleum hydrocarbons for the current building footprint.

No previous environmental studies have been conducted on 624 Pittwater Road.

SMEC Australia undertook a Targeted Environmental Site Investigation (TESA) on the entire site in mid-2014. The TESA identified a number of issues requiring further assessment to assist in remediation planning and building design. It was concluded that the site would be made suitable for the proposed development subject to addressing the identified matters.

Hazardous materials

A preliminary assessment of hazardous materials occurring on site was undertaken as part of the TESA in 2014. Asbestos Containing Material (ACM) was identified in the shed structure at the rear of 620 Pittwater Road, however asbestos was not detected in near surface fill/soil material tested at three target locations. Access to existing buildings at 624 Pittwater Road is limited and a hazardous materials survey will be conducted on all buildings across the site prior to any demolition works.

Geotechnical

The site is located on Quaternary sediments. The mapping identifies the underlying lithology for the site as comprising 'silty to peaty quartz sand, silt and clay; ferruginous and humic cementation in places; common shell layers'.

Groundwater occurs on the site, generally at a depth of about one metre below ground level. Groundwater levels are influenced by rainfall events.

More than 400mm of uncontrolled fill is present on the site and will require removal prior to redevelopment. The fill materials do not appear to have been placed in a controlled manner, and cannot be relied upon for structural support. Buildings will be designed to transfer loads to the underlying weathered sandstone material using piles.

Flooding

The *Manly Lagoon Flood Study – Flood Planning Levels, 2013* identifies part of the site (to the north) as being affected by the 1 in 100 year flood event, and Council has provided preliminary advice on requirements related to this in relation to development of the site. Design development would include regular consideration of these requirements and include consultation with Council as required.

Other

A desktop based assessment of the site was undertaken by SMEC Australia in March 2014. This included the following observations:

- Lot 3 DP539384 (624 Pittwater Road) and the northeast corner of Lot 1 DP 500541 (620 Pittwater Road) are mapped as Class 4 acid sulphate soils.
- Searches of publicly accessible heritage registers did not identify any items of Aboriginal or historic heritage that would be affected by development of the site.
- There are no material biodiversity issues associated with the site.

Consultation

Health Infrastructure has undertaken preliminary consultation with Warringah Council with regard to general planning considerations related to the proposed community health centre. Further consultation would be undertaken in preparing the EIS.

Request for Secretary's Environmental Assessment Requirements

Clause 8 of the SRD SEPP provides that development is declared to be State significant development (SSD) if it is not "permissible without development consent", and it is development specified in Schedules 1 or 2 to the SRD SEPP. Clause 14 of Schedule 1 of the SRD SEPP provides that development with a capital investment value of more than \$30 million for the purpose of a health facility is SSD.

The proposal comprises a 'health facility' as per the definition under the Standard Instrument (Local Environmental Plans) Order 2006. The anticipated construction value for the Brookvale Community Health Centre is \$32 million.

As such, the proposal is considered to comprise SSD and the planning approval pathway would be under Part 4, Division 4.1 of the EP&A Act. Health Infrastructure therefore requests that the Secretary of the Department of Planning and Environment issue the

SEARs to facilitate preparation of the EIS to accompany the SSD application for the Brookvale Community Health Centre.

If you require further information please contact Leone McEntee on 99785420 or 0410432505. We would be happy to meet with the Department at its convenience to discuss any aspect of the proposal.

Yours sincerely
Health Infrastructure



Sam Sangster
Chief Executive