

24 July 2017

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

Dear Ms McNally

**Hornsby Ku-Ring-Gai Hospital Redevelopment (Stage 2)
Request for Secretary's Environmental Assessment Requirements**

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 'Stage 2' redevelopment of the Hornsby Ku-Ring-Gai Hospital (HKHR).

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

Background

The Hornsby Ku-Ring-Gai Hospital (HKH) campus provides a comprehensive range of services to the local catchment. As a whole, the campus is, however, in need of redevelopment due to the combined impacts of aged infrastructure which has in many cases reached the end of its useful economic life, is no longer compliant with current guidelines or community expectations or no longer supports the delivery of contemporary, efficient health services.

The historic development of the HKH campus has been piecemeal, with small and medium scale alterations and additions over a period of 70 years. The HKH functions as a teaching hospital, playing an important role in training future clinicians. Consequently, the facilities need to be capable of supporting the delivery of high quality contemporary care in order to attract senior staff and those who are training to maintain its vital role as a teaching facility, whilst also meeting the needs of the community.

Given the scale of the campus and need to maintain services, a multi stage redevelopment process, aligning with the adopted Clinical Services Plan for the facility, has been identified as the most appropriate method for delivering the upgrades.

In 2013, the then Department of Planning and Infrastructure approved an initial stage (HKHR Stage 1) of an overall campus redevelopment. The HKHR Stage 1 project is complete, delivering the following services:

- Peri-operative Services including:
 - Pre-admission and clinical spaces;
 - 8 Theatres including endoscopy and fixed x-ray imaging capability;
 - Recovery spaces;
- Three x 28 bed inpatient units;
- Sterilising Services Department;
- Support services for linen, loading docks and stores
- Health Information Services (Medical Records)

The HKHR Stage 1 project was predominantly undertaken in the south eastern corner of the site.

The HKHR Stage 2 project is proposed to include:

- A new main hospital entry point;
- Four new 28 bed Inpatient Units;
- New Intensive Care Unit with 12 beds;
- Combined new and refurbished ambulatory care areas;
- Extended Emergency Department including Transit Lounge;
- Increased capacity of the existing Psychiatric Emergency Care Centre from 4 to 6 beds;
- A new pharmacy;
- Two new 28 bed rehabilitation wards and treatment consultation space;
- Mortuary;
- Teaching, education and research facilities;
- Administration space for clinical and corporate support;
- Car parking (on grade); and
- Soft landscaping.

The HKHR Stage 2 project is proposed to be sited adjacent to the Stage 1 project to ensure improved functionality, efficiency and connectivity with the Stage 1 facilities.

A separate development application has been made to Hornsby Shire Council (HSC) for a multi level car park. The final number of parking spaces to be provided on site will be considered in the preparation of the EIS.

The location of the existing site improvements are illustrated in **Figure 1**.

FIGURE 1 – EXISTING IMPROVEMENTS AND LOCAL CONTEXT



The Site and Locality

The existing Hospital site is bound by Palmerston Road to the west, Low Road and James Park to the north, Burdett Street to the south and Derby Road to the East.

The Hospital site is located approximately one kilometre to the east of the Hornsby town centre and occupies an area of approximately 6.4 hectares. Hornsby Railway Station is located approximately 1.5 km to the west of the site, whilst Waitara Station is found 1.5km to the south east and Asquith Station is found 2 kilometres to the north east. A direct bus route connects the Hospital Campus with Hornsby Railway Station. The Pacific Highway, Pennant Hills Road, M1 Motorway and the Main North and North Shore Rail lines make Hornsby highly accessible, and a key transport interchange to the wider area.

As reflected in Figure 1, the locality is predominantly residential in character with low density scale residential properties interspersed with medium density housing in the vicinity of the Hospital campus. Private health services facilities and professional consulting rooms are also found in the locality, with a concentration on Palmerston Road, to the immediate west of the site.

The Project

The HKHR Stage 2 project is the second of a multi stage, 'whole of campus' redevelopment. Stage 1 redevelopment works have been completed, whilst Stage 3 works are yet to be fully scoped, and as such do not form part of this project or application. Plans showing the extent of works and built form are attached at **Appendix A**.

The Stage 2 project will see the construction of a five storey building, with rooftop plant rooms and an undercroft. The overall height of the Stage 2 redevelopment project will be approximately 26.5 metres from the existing ground level, with the roof level of the plant rooms a further five metres to 31.5 metres. Figures 2 to 7 illustrate the location of the proposed works relative to other improvements on the site, whilst also revealing the overall built form of the Stage 2 project.

FIGURE 2 – INDICATIVE SITE LAYOUT – STAGE 2 WORKS

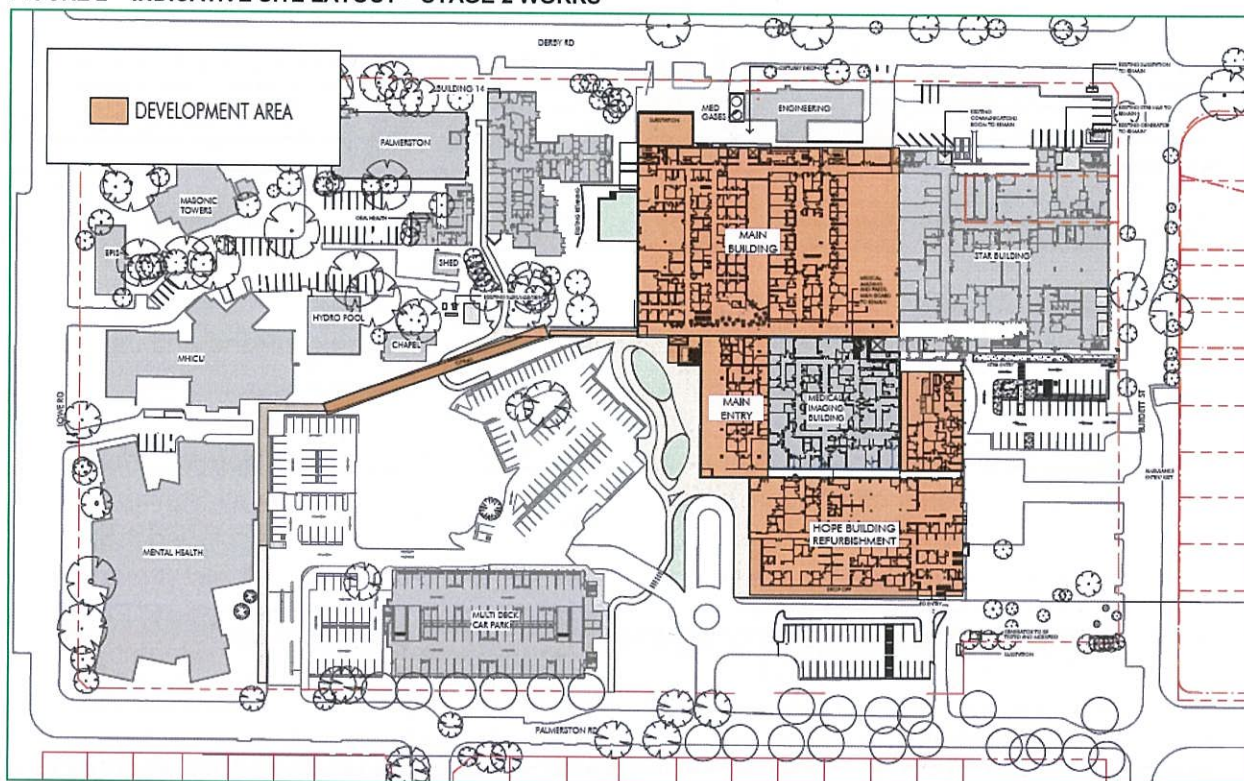


FIGURE 3 – PROPOSED BUILT FORM (MASSING CONCEPT DIAGRAM)

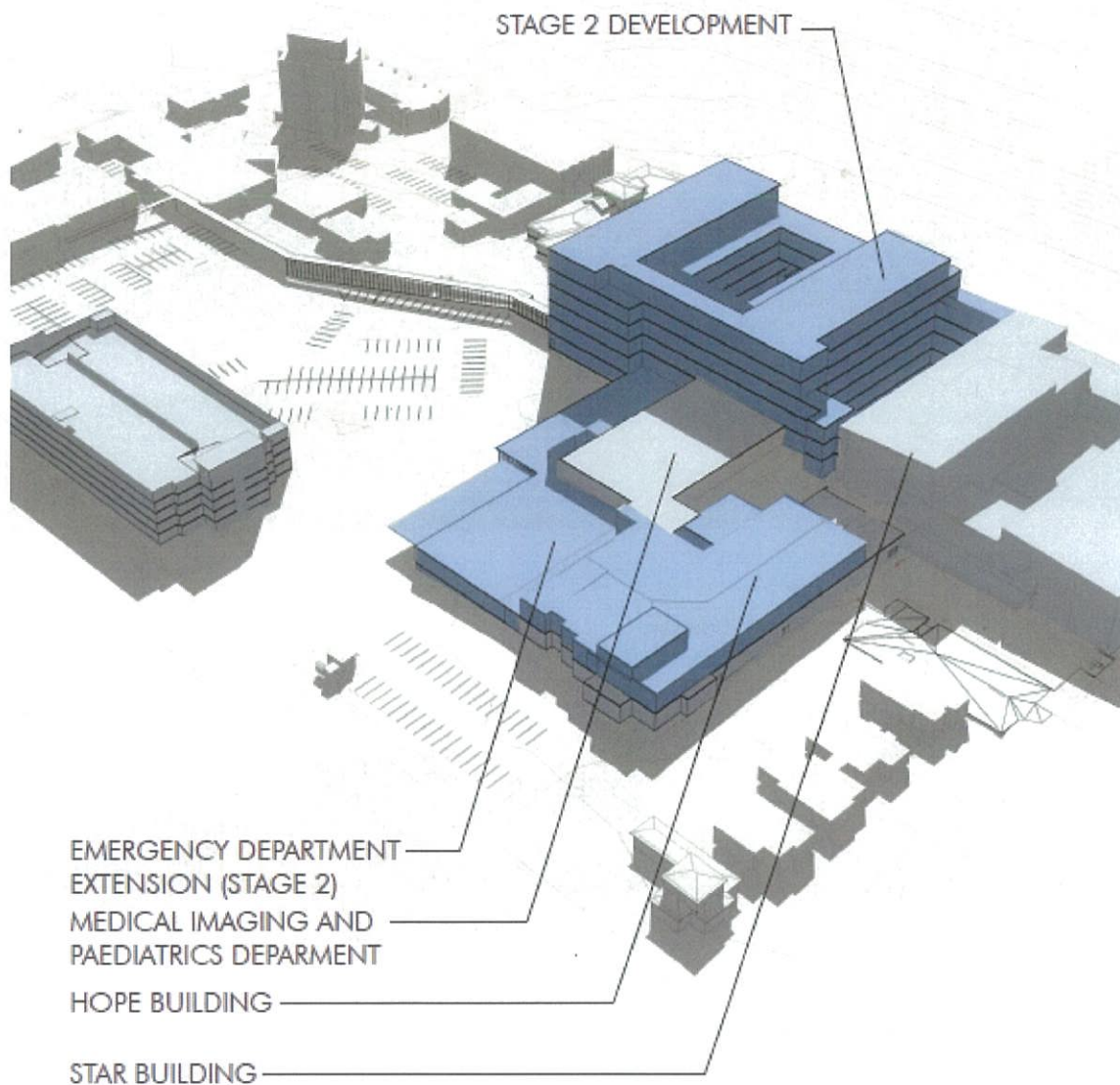


FIGURE 4 – FAÇADE CONCEPT - ENTRY



FIGURE 5 – ELEVATION CONCEPT PALMERSTON ROAD



FIGURE 6 – ELEVATION CONCEPT NORTH



FIGURE 7 – ELEVATION CONCEPT – DERBY STREET



In general terms, the following services will be provided:

Level 0 (Basement)

- Pharmacy
- Mortuary
- End of Trip Facilities

Level 1 (Ground Floor)

- Ambulatory Care
- Medical Assessment Unit
- Patient Transit area
- Main Entry including ancillary retail space
- Medical Imaging
- Emergency Department and Medical Unit
- Psychiatric Emergency Care Centre

Level 2

- Intensive Care Unit
- Cardiac Investigations
- Paediatrics and Maternity

Level 3

- Rehabilitation

Level 4

- General Medical
- Stroke
- Dementia / Delirium

Level 5

- Administration
- Teaching

Level 6

- Plant

Access points to the building will primarily through the new main entry which will be supported by a drop off point. A separate entry will be provided to the Emergency Department. The finished floor levels for the Stage 2 buildings will match the recently completed Stage 1 building at the ground level and over the first four levels to allow for direct connections, whilst connectivity with the balance of the campus will be maintained through an enclosed link way which runs through the centre of the site.

Strategic Context and Need for the Redevelopment

As documented in *A Plan for Growing Sydney*, The NSW Government is planning for population growth of over 1.6 million per annum across the Sydney Metropolitan Region for the period 2016 to 2036. The Impact of this growth on local health care services and hospitals such as HKH is compounded by the growth in the older population and associated increase in patient acuity and complexity.

NSW State Plan

NSW 2021 is the current State Plan for NSW. With respect to Health Services, the plan identifies the goal as being 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"*.

The key goal with respect to health infrastructure delivery is to provide world class clinical services with timely access and effective infrastructure. Within this there are several major goals and actions to implement the targets. These targets are:

1. Reduce hospital waiting times
2. Improved transfer of patients from emergency departments to wards
3. Reduce unplanned readmissions
4. Decrease healthcare associated bloodstream infections
5. Ensure all publically provided health services meet national patient safety and quality standards
6. Increase patient satisfaction

This project contributes to meeting the goals and targets by building on the investment made for Stage 1 to deliver Stage 2 as an integral component in the redevelopment of the HKH Campus.

A Plan for Growing Sydney

A Plan for Growing Sydney sets down the Government's vision for Sydney as a strong global city and a great place to live.

To achieve this vision, the Government has set down goals that Sydney will be:

- a competitive economy with world-class services and transport;
- a city of housing choice with homes that meet our needs and lifestyles;



- a great place to live with communities that are strong, healthy and well connected; and
- a sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

Specifically, Action 1.10.3 plans for the expansion of health facilities to service Sydney's growing population and states that:

Continued provision of world-class health services will require an expansion of health facilities such as hospitals and community health facilities. It will also involve ensuring health care providers can respond to population growth and changes in the State's demography such as more births and more older people. Lifestyles, the built environment and socio-economic factors will also have implications for future health service needs.

The delivery of the Stage 2 HKH redevelopment aligns with this action through expanding the capabilities and capacity of the campus whilst responding to demographic changes and socio-economic factors across the catchment serviced by the facility.

Draft North District Plan

The Draft North District Plan was exhibited in early 2017 and includes specific priorities relating to the HKH Campus which are to:

- Support health related land uses and infrastructure around Hornsby Ku-Ring-gai Hospital; and
- Improve walking and cycling connections between Hornsby Station and the Hospital.

The delivery of the Stage 2 HKH redevelopment will reinforce these priorities through expanding the capabilities of the campus, which will in turn support other health related land uses in the vicinity of the Hospital.

Planning Context

Environmental Planning and Assessment Act 1979

Part 4 Division 4.1 of the EP&A Act establishes the assessment framework for SSD. Under Section 89D the Minister for Planning is the consent authority for SSD and Section 78A(8A) requires that a development application for SSE is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the EP&A Regulations.

State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the Policy provides that:

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).

As the proposal is for the purposes of a hospital that has an estimated Capital Investment Value (CIV) of \$30 million, it is considered to be a SSD.

Other State Planning Policies

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

- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55); and
- State Environmental Planning Policy (Infrastructure) 2007.

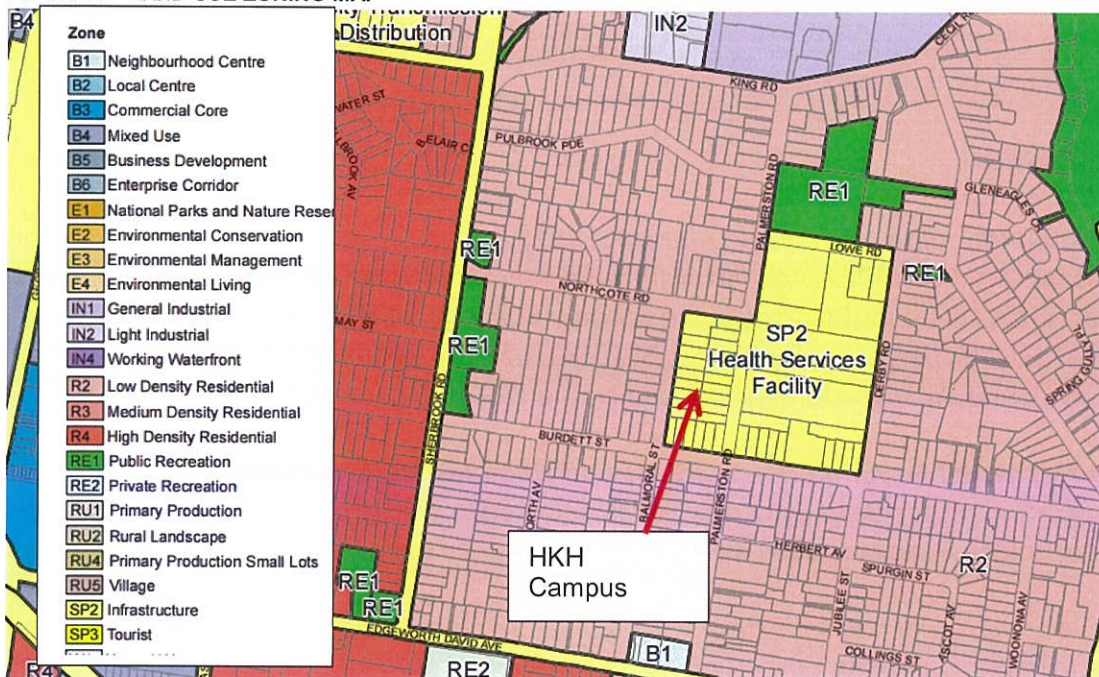
Hornsby Local Environmental Plan 2013

The Hornsby Local Environmental Plan (LEP) 2013 applies to the subject site and includes a land use table with zone objectives, principle development standards and miscellaneous provisions to guide development across the Hornsby LGA.

The HKH campus zoned SP2 Infrastructure – Health Services Facility under the Hornsby LEP 2013. The objectives of the 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.

FIGURE 5 – LAND USE ZONING MAP



Health Services Facilities, and any development that is ordinarily incidental or ancillary development to Health Services Facilities are permitted with consent in the zone.

The definition of Health Services Facilities is provided in the dictionary appended to the LEP and is replicated below:

health services facility means a building or place 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 any of the following:

- (a) a medical centre,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) patient transport facilities, including helipads and ambulance facilities,
- (e) hospital.

The existing use and proposed development is most appropriately characterised as a hospital, which is also defined in the LEP, and is therefore permitted with consent.

The Hornsby LEP 2013 does not include any principal development standards to limit the height of buildings or floor space ratio on the subject site. Similarly the campus is not mapped as being affected or impacted by any of the following:

- Flooding;
- Bushfire;
- Acid Sulphate Soils;
- Land Reservation Acquisition; or
- Terrestrial Biodiversity.

Clause 6.8 of the Hornsby LEP 2013 applies to development involving the erection of a new building or alterations to an existing building which will result in a building with a height of more than 29.6 metres. Clause 6.8 requires that development consent must not be granted to development to which this clause applies unless the consent authority considers that the development exhibits design excellence.

Clause 6.8(4) provides detailed criteria for determining whether the proposal exhibits design excellence in terms of architectural and urban design. While the application of Clause 6.8 to the site is limited by Clause 5.12(1) of the Hornsby LEP 2013, which has the effect of turning off any provisions which restrict or enable the restriction of development that is permitted to be carried out with development consent under *State Environmental Planning Policy (Infrastructure) 2007*, the concept design seeks to provide a high quality built form which responds to the context of the site and immediate surrounds while meeting the future needs of the HKH Campus. In this way, the proposal will embody the objective of Clause 6.8.

Preliminary impact identification and risk assessment

Traffic and Parking

The HKH Stage 2 Redevelopment will generate demand for additional parking spaces and will result in alterations to existing access, manoeuvring and car parking arrangements. It is proposed that demand will be satisfied through the provision of a multilevel car park, which is currently being considered by HSC. The EIS will give consideration to the likely impacts of the proposal on the local road network and consider the adequacy of the proposed car parking arrangements.

Consideration will also be given to access and parking arrangements during the construction phase to mitigate impacts associated with any car parking spaces displaced by the building works.

Geotechnical, Ground Contamination and Hazardous Materials

Based on preliminary geotechnical investigations, site is generally underlain by very stiff to hard silty clay and clay, with some iron-cemented bands overlaying sandstone bedrock. The depth of the sandstone bedrock is ranges from 1.5 to 8.23 metres.

The report also states that: "Field pH tests indicated soil samples collected at depth from the site were not acidic and well above the ASSMAC (1998) guideline of pH ≤ 4 . Also, pyrite and jarosite was not observed during the investigation and no sulphurous odours were recorded. During field investigations no unripe muds, mid to dark grey estuarine sands or shell were detected. The soils at the site down to the investigated levels, therefore, did not contain Actual Acid Sulphate Soils."

In August 2014, Douglas Partners (DP) undertook a geotechnical investigation of the area on site where the Stage 2 works are proposed. As was the case for the Stage 1 investigations, the area has clay soils over sandstone bedrock. DP provided a number of recommendations for the substructure of the building that will be considered in the detailed design of the building and will be addressed in the EIS.

Preliminary Contamination Investigations undertaken by Douglas Partners (2014) indicate a low level of contamination at the site however does identify the presence of asbestos in one borehole. The EIS will give consideration to any further investigations required prior to, and following the demolition of the buildings and any validation requirements relating to ground conditions to ensure the site is suitable for the intended use.

Built Form

Whilst the site has no maximum building height control, the surrounding development is predominantly a low density residential environment. The proposed scheme will be the subject of a merit assessment with regard given to the siting, height and massing of the proposed development in the context of the surrounding landscape.



Noise Impact

An analysis of the construction and operational noise will consider the impacts upon the amenity of nearby residents and will form part of the EIS.

Heritage Impact

The HKH campus contains the Collingridge House Chapel, an item of local heritage significance. Works proposed within the vicinity of the Chapel will be limited to the construction of pathways and landscaping works. The likely impacts of such works on the heritage values of the Chapel will be considered in the preparation of the EIS.

Request for Secretary's Environmental Assessment Requirements

On the basis that the proposal falls within the criteria identified in Schedule 1 of the SEPP (State and Regional Development) 2011, having a capital investment value of approximately \$185 million, Health Infrastructure formally request that the Department of Planning and Environment issue SEARs to facilitate the preparation of the EIS to accompany an application for State Significant Development.

If you require any additional information please contact Leone 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,

Sam Sangster
Chief Executive

Attachment 1 – Concept Architectural Plans – Nettleton Tribe Architects

ATTACHMENT 1

HKH CAMPUS STAGE 2 SSD

CONCEPT ARCHITECTURAL PLANS