

16 October 2017

The Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally

**RE: Health Services Building – Royal North Shore Hospital
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), Health Infrastructure requests the issue of Secretary's Environmental Assessment Requirements (SEARs) for a State Significant Development (SSD) application for the proposed new Health Services Building within Precinct 4 of the Royal North Shore Hospital campus. On 22 September 2017 the Minister for Planning and Environment declared the project as State Significant Development in accordance with Section 89C(3) of the *Environmental Planning and Assessment Act 1979*, taking effect from the date of publication in the Government Gazette. The Order was published on 13 October 2017.

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

1 Background

In April 2007, The Minister for Planning approved a Concept Plan for the Royal North Shore Hospital redevelopment (MP06_0051) under Part 3A (now repealed) of the *Environmental Planning and Assessment Act 1979*. To date the redevelopments have been exclusively for health related purposes, including the new Acute Services Hospital Building, Community Health Building, Clinical Services Building and Kolling Research and Education Institute.

In addition to health uses, the approved Concept Plan identified various precincts which were intended to be redeveloped for specific purposes, such as residential, commercial, and retail uses, including that Precinct 4 "shall be developed for employment generating land uses and may include residential and temporary accommodation"¹. This Precinct has not yet been redeveloped.

Since that time, NSW Health has identified the need to relocate its administrative support and other health related organisations and has sought options that meet both the needs of

¹ Approval MP06_0051 M2(f)(ii)

the Ministry of Health and Government Policy on decentralisation away from the Sydney CBD.

It is proposed that a new building to accommodate these organisations is located within Precinct 4 of the RNS Campus.

2 The Locality

The Royal North Shore Hospital is located in St Leonards on the lower north shore within the Willoughby Local Government Area (LGA), approximately 6.5 km from Sydney CBD. St Leonards has been identified as a 'Strategic Centre' in the December 2014, "Plan for Growing Sydney" by the Department of Planning and Environment. This is primarily due to the presence of the RNS Hospital, as well as the scale of office employment and its strategic location along rail and bus networks. St Leonards provides regionally significant concentrations of employment, health, education and lifestyle related activities at a location well serviced by public transport, as well as supporting areas of higher density residential development.

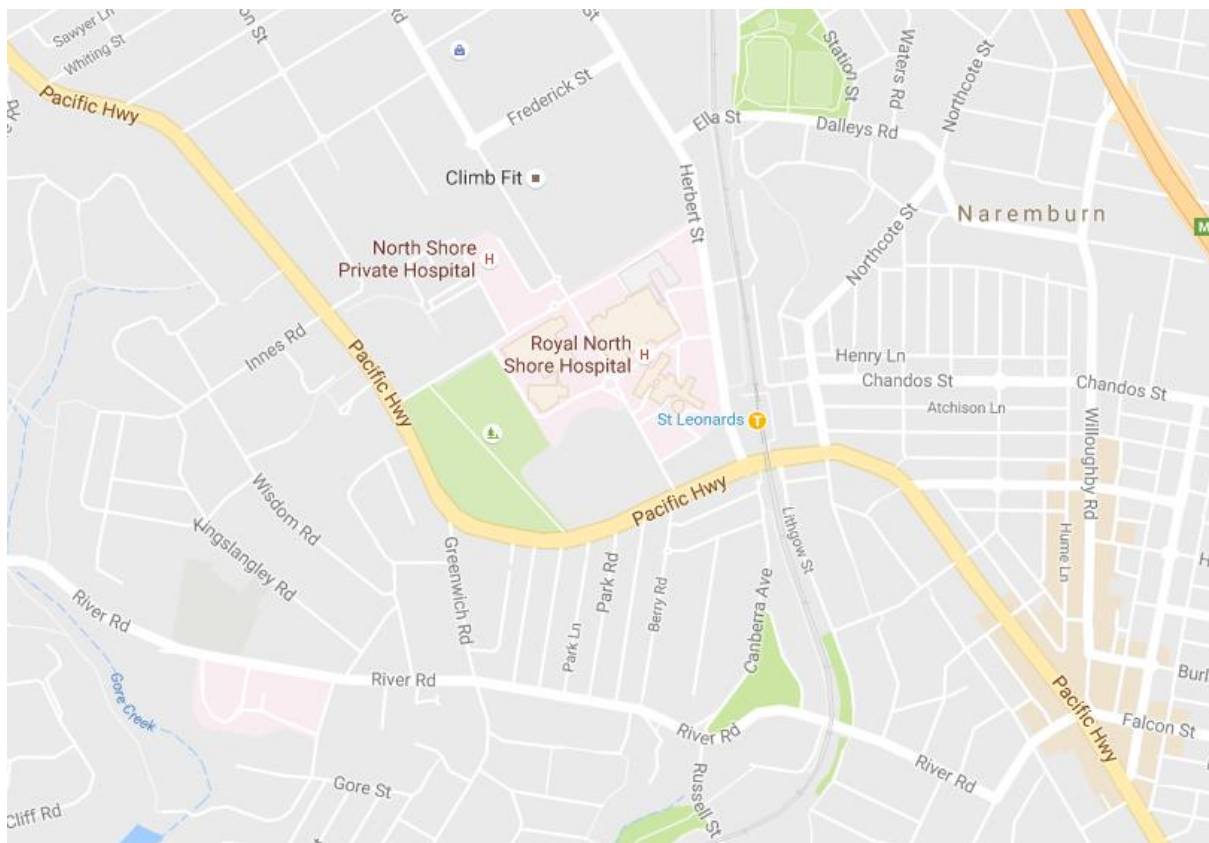


Figure 1: Locality Plan (source: Google Maps)

3 The Site

The site has excellent access to the Sydney CBD. It is located within immediate proximity of St Leonards Railway Station, and lies on several major bus routes. It is within easy walking distance of transportation networks, shops, offices, open space and residential properties. It has convenient access to both the Pacific Highway and the Orbital Motorway (including the Gore Hill Freeway).

RNS Hospital is surrounded by a wide variety of land uses, including St Leonards CBD and high density housing to the east; residential development to the south and east; special uses (UTS North Sydney TAFE, Gore Hill Memorial Cemetery and former ABC site) to the west; industry and Gore Hill Park to the immediate south west.

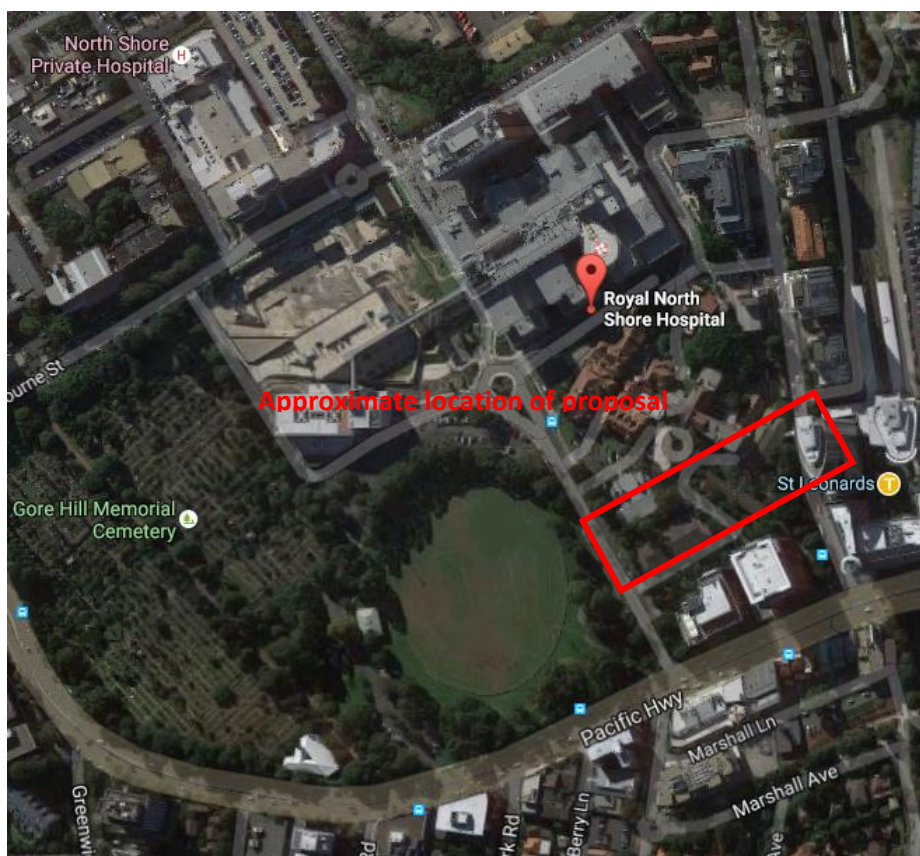


Figure 2: RNS Hospital Site (source Google Earth)

Zoning and Existing Development

The site is zoned **SP2 Infrastructure** under Willoughby Local Environmental Plan 2012 for the purposes of “Hospital” (refer to Figure 3).

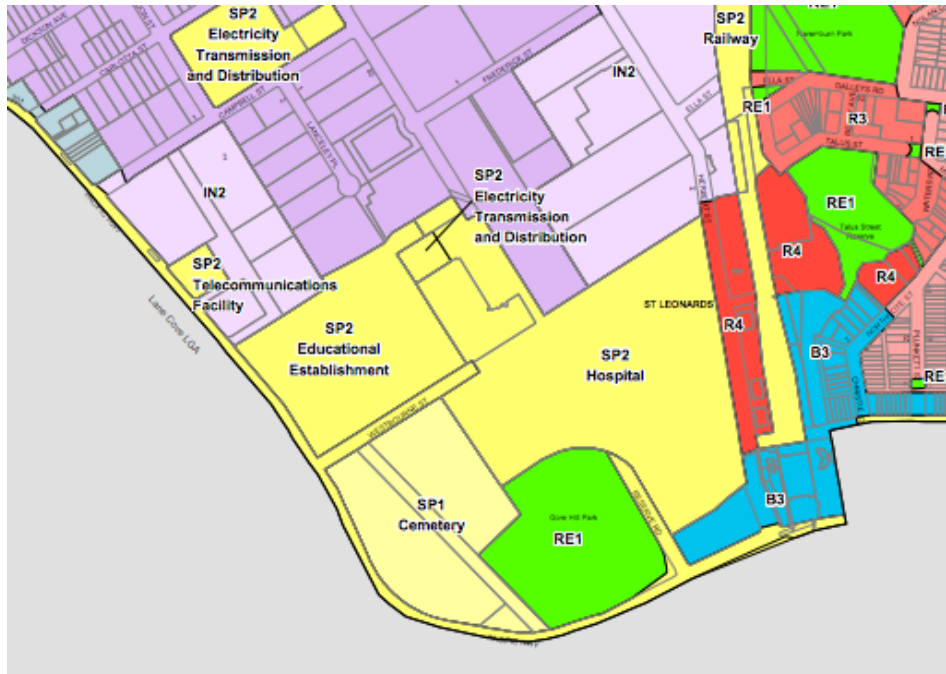


Figure 3: Extract from Willoughby LEP 2012

There has been substantial redevelopment on the RNSH site since the Concept Plan was approved including:

- New Acute Services Building;
- New Community Health Building;
- New Clinical Services Building;
- New Kolling Research and Education Building;
- New multi storey car park; and
- Refurbishment to various buildings across the site.

The map below shows the current schematic layout of the RNSH site.

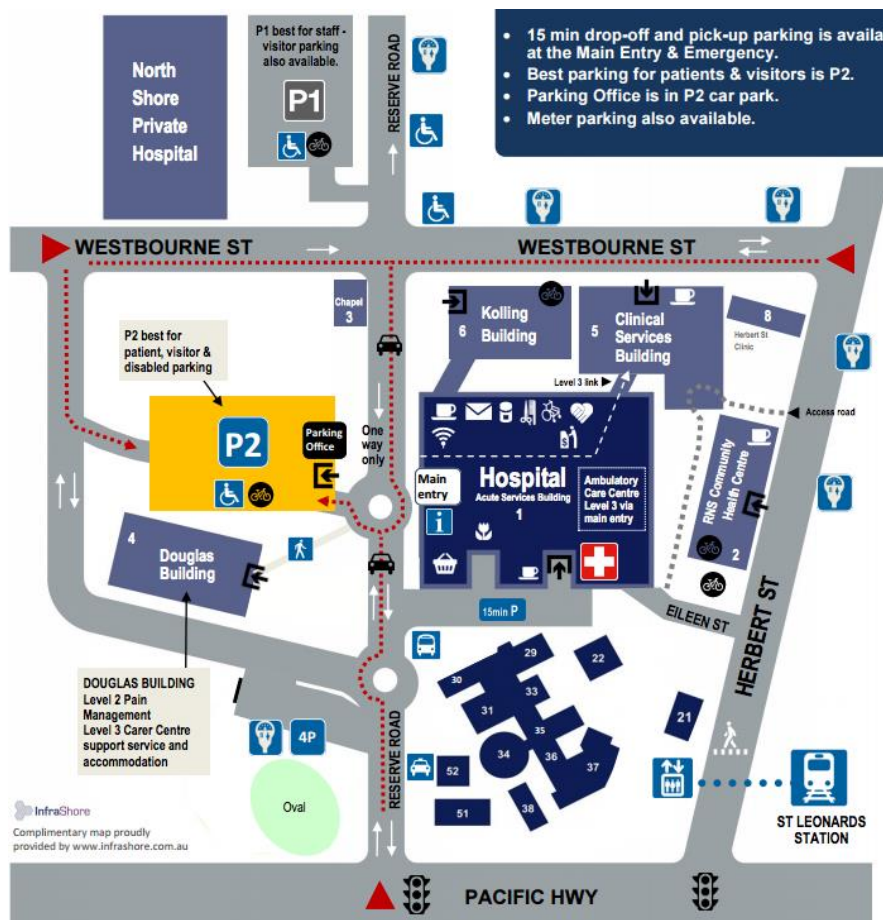


Figure 4: Schematic plan of RNSH (source: RNSH website)

Site Access

The main access to the site is from Herbert Street for those coming from the St Leonards Railway Station or from Reserve Road or Westbourne Street for vehicle access from the Pacific Highway. The proposed redevelopment will be accessed from Reserve Rd in the general proximity of building 52 (refer to figure 4 above).

Contamination

Initial contamination assessments have been undertaken on the site which have not identified any significant contamination that cannot be managed as part of the normal development process.

Heritage

Aboriginal Heritage

Archaeological Reports have not identified the site as of Aboriginal cultural significance, however unexpected finds would be treated in accordance with the current legislative framework.

European Heritage

The current RNSH site was formed historically through cumulative land acquisitions and resumptions. Godden Mackay Logan's (GML) 2006 Heritage Impact Statement prepared for the Concept Plan identified the history of the site's development since 1902 and identifies the significant elements of the site in terms of European Heritage.

Two of the buildings identified in the GML report as being listed under the Heritage Act 1977 State Agency Heritage Register have since been approved for demolition following archival recording. These are Building 7 (Regional Diabetic Services Building) and Building 9 (Lanceley Cottage). As part of the Concept Plan Approval, the Old Hospital Precinct (Precinct 3) was identified as significant and no development was approved for this area. The buildings in this area are:

Buildings 29 – Block 1B

Building 30 – Block 1A

Building 31 – Residential Medical Officers Quarters;

Building 32 – Ansto Body Protein; and

Building 33 – Orthotics

These building are included in Schedule 5 of Willoughby LEP as having Local Significance. No other buildings on site are listed as heritage items, either locally or with the State.

No buildings within Precinct 4 are heritage listed.

4 The Project

The proposed building is located within Precinct 4A of the approved Concept Plan 06_0051 approved under Part 3A of the EP&A Act.



Figure 5: Approved Concept Plan showing Precinct 4a

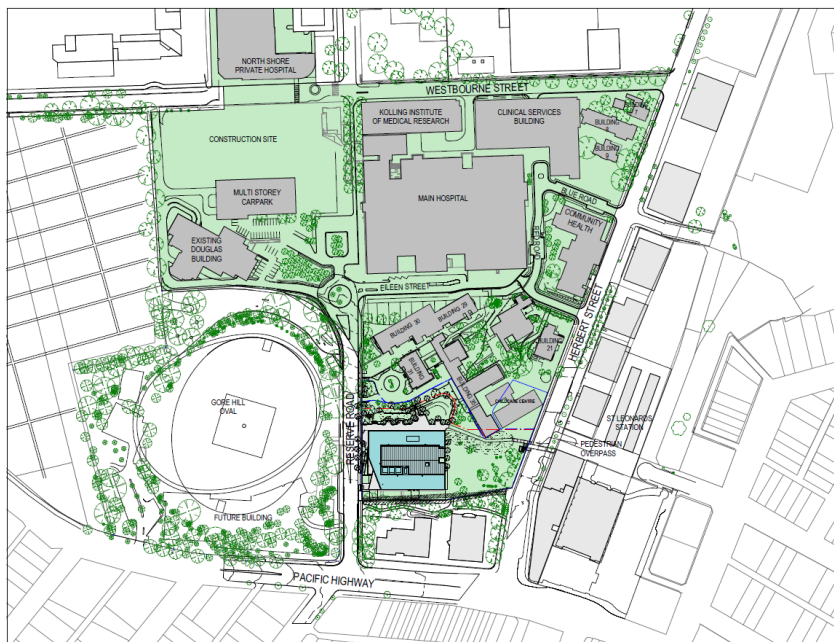


Figure 6: Proposed Building

The proposed building is ten (10) storeys above ground plus plant configuration with two levels of basement parking. The ground floor will comprise a childcare facility (internal and external space), retail (café) and the entry lobby. Above that will be 9 floors of office space which will house administrative and other ancillary functions of NSW Health including the following:

- Ministry of Health and other entities
- Health Infrastructure (HI)
- HealthShare
- eHealth
- Agency for Clinical Innovation (ACI)
- Bureau of Health Information (BHI)
- Clinical Excellence Commission (CEC)
- Health Education and Training Institute (HETI)
- Cancer Institute NSW
- Ambulance Service NSW

NSW Ministry of Health

The Ministry of Health provides the key Westminster functions supporting the Ministers and the Government, as well as licensing and regulatory functions, direction of public health functions (pandemic management, emergency public health action, disease surveillance, control and prevention) and “system manager” functions (state-wide planning, purchasing, performance monitoring and management of hospitals and health services).

Pillars

Following a Commission of Inquiry conducted by Peter Garling SC in 2009, four statutory Health Corporations were created or confirmed to support clinicians to improve the way in

which health care is delivered. The following Pillar organisations will be located in the proposed building:

- The Agency for Clinical Innovation is the primary agency for engaging clinical service networks and designing and implementing new models of care. The Agency will work directly with the LHD's including Sydney North located on site.
- The Bureau of Health Information is the primary source of quality information to the community, healthcare professionals and policymakers.
- The Clinical Excellence Commission has responsibility for quality and safety and providing leadership in clinical governance to hospitals across NSW.
- The Health Education and Training Institute has a focus on training and capability development in the system, including post-graduate training, clinical and non-clinical leadership development and undergraduate and vocational training.

Shared Services

Consistent with Government policy to use resources wisely, shared service organisations support health care for health facilities (including hospitals) across the State.

- HealthShare NSW provides linen, food, payroll, warehousing and logistics, procurement and transactional finance and other shared services to public hospitals and Local Health Districts.
- eHealth is supported through HealthShare NSW and is a system leader for the NSW Health Clinical Information strategy, forward planning and delivery. NSW Health ICT capability is decentralised with eHealth responsible for leading ICT strategy based implementation of state-wide plans working closely with Districts and the clinical community.
- Health Infrastructure provides capability in major capital works planning and delivery for the health system. HI manages all capital projects over \$10m in value, and develops procurement systems and templates for use in the procurement of works under \$10m.

The building itself will contain approximately 42,363m² of gross floor area + 115 car spaces contained within two below ground basements accessed from Reserve Road. This provides net lettable areas of approximately 29,060m², of this area, approximately 27,005m² will be dedicated to health administration uses, 2055m² to ground floor retail to support the uses within the building, with 1623m² of this is dedicated to childcare.

Images of initial design for the building are shown below.

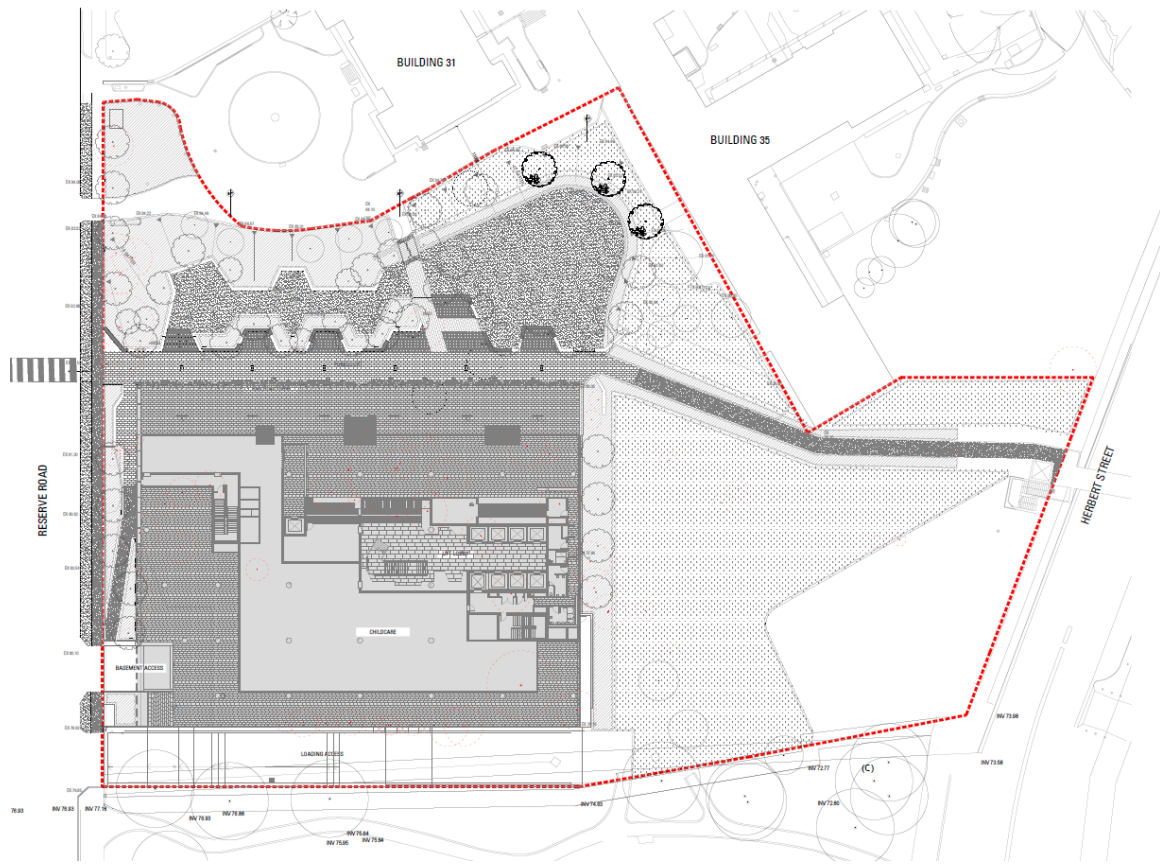


Figure 7 Proposed Masterplan (source: Arcadia Landscape Architecture)

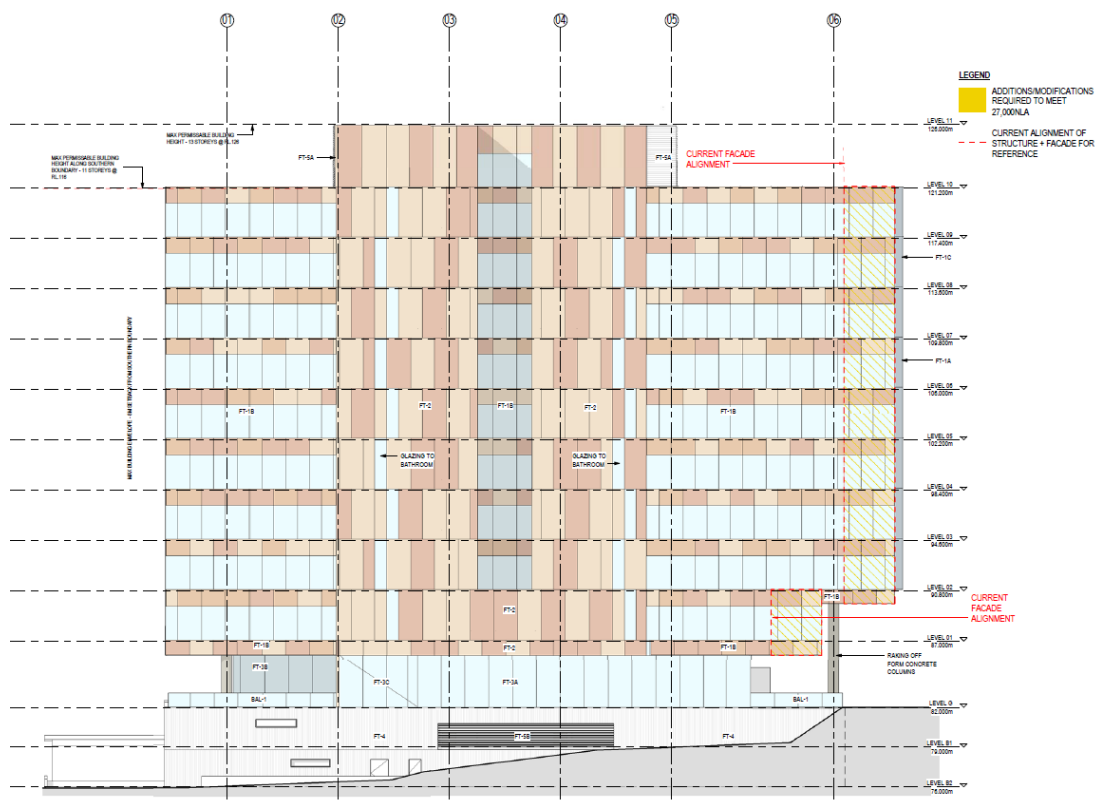


Figure 8: Proposed Elevation (source: BVN Architects)



Figure 9: Proposed Elevation (source: BVN Architects)

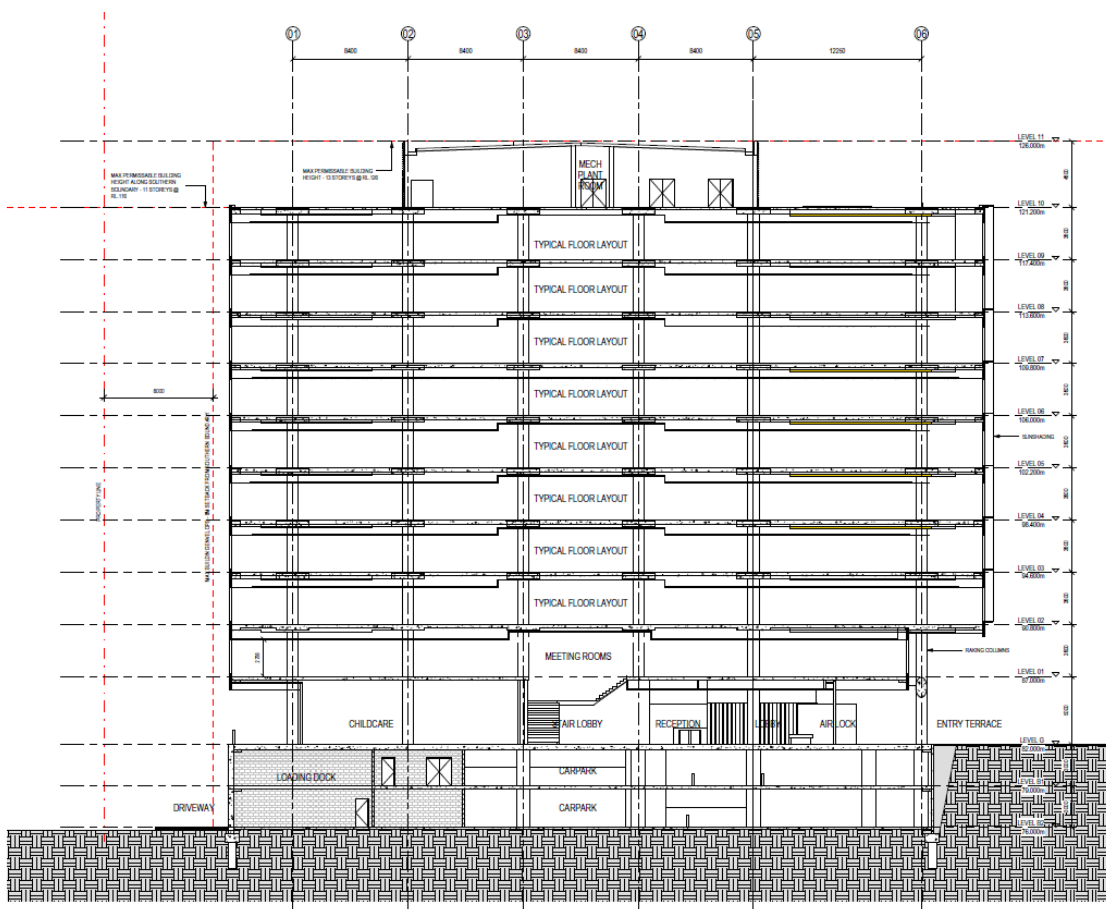


Figure 10: Proposed Section (source BVN Architects)

The form of the proposed building is generally consistent with the approved Concept Plan (as modified by 06_0051 MOD 7 dated 20 July 2017), and is a single structure with a landscaped area provided connecting the heritage area in Precinct 3.

The proposed building is 50m in overall height including plant (from RL 76 to RL126) and is setback 12m from the boundary of 207 Pacific Highway to the south and 30m from the heritage Precinct 3 to the north. Further details of the indicative design can be found on the attached drawings.

5 Planning Issues

5.1 Strategic Planning Context

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 by investing in critical infrastructure. The two key Health goals for the State are:

- "Provide world class clinical services with timely access and effective infrastructure"; and
- "Keep people healthy and out of hospital".

The State Plan includes:

"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 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.

A Plan for Growing Sydney

The NSW Department of Planning and Environment's "A Plan for Growing Sydney" has the overarching Vision for Sydney to be "a strong global city, a great place to live". It identifies St Leonards as a Strategic Centre for health related employment and commercial and office

uses to grow job creation. This proposal is consistent with and promotes the objectives of the Plan which promotes the following priorities for St Leonards:

- Retain a commercial core in St Leonards for long term employment growth.
- Provide capacity for additional mixed use development in St Leonards including offices, health retails services and housing.
- Support health related land uses and infrastructure around Royal North Shore Hospital.
- Investigate potential future employment and housing opportunities associated with a Sydney Rapid Transit train station at St Leonards/Crows Nest.

Draft North District Plan

The Draft North District Plan recognises St Leonards as a key Strategic Centre that contains over 47,000 jobs (2016) with the majority within knowledge and professional services and health care.

St Leonards has a range of significant metropolitan health and education assets, including the RNSH, North Shore Private Hospital and TAFE NSW St Leonards campus. The draft District Plan identifies St Leonards as a health and education Super Precinct. There are opportunities to define the centre's commercial identity through the integration of health and education assets and the provision of complementary health and medical research activities; private hospitals; allied health; ancillary retail; visitor, carer and aged accommodation.

The proposal is entirely consistent with the draft North District Plan as it will facilitate growth and diversification of job opportunities in St Leonards in accordance with the Plan.

5.2 Statutory Planning

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

The Commonwealth EPBC Act legislates the provisions for the assessment of actions likely to have a significant impact on Matters of National Environmental Significance (MNES) listed under the Act. The proposal will not have a significant impact on any MNES and therefore will not trigger the requirements of the EPBC Act.

Threatened Species Conservation Act 1995

The *Threatened Species Conservation Act 1995* (TSC Act) identifies threatened species, populations and ecological communities in NSW and provides mechanisms for their conservation and recovery. Based on previous work on the site, the provisions of the TSC Act are unlikely to apply

Contaminated Land Management Act 1997

The subject land is not subject to any declarations, orders, or voluntary management proposals as defined in the *Contaminated Land Management Act 1997*.

Heritage Act 1977

Refer to Heritage at **Section 3** above.

State Environmental Planning Policies

Various State Environmental Planning Policies apply to the site, mostly as a result of being applicable to the State. Key considerations for the proposal are SEPP 55 and SEPP (Infrastructure).

Local Environmental Plan***Permissibility***

The site is zoned **SP2 Infrastructure** for the purpose of a Hospital under Willoughby LEP 2012.

The development is proposed to be located within hospital grounds and is to be developed with the primary purpose to assist the ongoing administrative operations of NSW Health. The development is therefore considered to be permissible as ancillary to the existing hospital.

The State Significance of the proposal is confirmed by the Minister for Planning and Environment's declaration on the 22 September 2017 that the project is State Significant Development in accordance with Section 89C(3) of the *Environmental Planning and Assessment 1979*.

In addition, Clause 57(1) of the State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) allows a health services facility to be permissible in any of the prescribed zones listed in the ISEPP. SP2 is a Prescribed Zone in the ISEPP and therefore the proposal is permissible with consent.

6 Consultation Undertaken

Consultation has occurred with Willoughby City Council, Growth Centres Commission and utilities in preparing the proposal.

7 Request for SEARs

On the basis that the project has been declared State Significant Development by the Minister for Planning as outlined above, Health Infrastructure formally requests that the Department of Planning and Environment issue the Secretary's Environmental Assessment Requirements to facilitate the preparation of the Environmental Impact Statement for the State Significant development application for the proposal described above

If you require any additional information, please contact Leone McEntee on 0410 432 505. We would be happy to meet with the Department to discuss the proposal at any time.

Yours sincerely



Sam Sangster
Chief Executive Officer

Attachment A – Concept Architectural Drawings