



Greens NSW
John Kaye MP
22 November 2013

Submission to the Northern Beaches Hospital Environmental Impacts Statement Stage 1 (SSI 5982) John Kaye, Greens NSW MP and Health Spokesperson

The Greens welcome the opportunity to comment on the government's first Environmental Impact Statement of the proposed new Northern Beaches Hospital. The Greens support increased investments into public hospitals to serve community needs but the proposed Northern Beaches Hospital will not achieve this outcome. The proposed hospital as outlined in the Environmental Impact Statement will reduce the accessibility and quality of services and undermine existing public provision of health care.

The Greens object to the proposal and believe that there are four primary heads of objection to the planned hospital located at the Frenchs Forest site:

1. **The proposed hospital is in the wrong location.** It is vulnerable to traffic congestion, flooding and is unreasonably close to the recently rebuilt Royal North Shore Hospital. Suitable traffic management plans have yet to be developed and the cost impact of mitigation is yet to be quantified.
2. **The proposed hospital will have devastating environmental impacts** by irrevocably damaging one of the last viable remnants of Duffys Forest ecological community. The proposal to compensate by protecting a habitat elsewhere is not an appropriate solution for the loss that would be imposed by this development.
3. **The proposed hospital will significantly negatively impact the local community.** Noise pollution, increased traffic and site overshadowing have not been adequately addressed by the proposal.
4. **The proposed hospital will lead to the downgrading of comprehensive public health care** in the region and the inevitable closure of Mona Vale Hospital. The proposed hospital will more than double the number of private beds available in the region. Based on SHOROC's baseline figures and media reports of projected post development bed numbers, public beds will decrease in numbers and become centralised¹.

The Greens believe that the provision of public health care on the Northern Beaches must be greatly improved. However this proposed hospital is not the solution. Priorities in delivering a strong and responsive public health service should include building on existing public health infrastructure, reflecting community wishes, retaining public management and control and ensuring access. The government's proposed hospital model, location and service delivery will not meet the Northern Beaches' current health needs and are opposed in their current form.

¹ SHOROC State of the Region Report: Hospital Beds (<http://www.shoroc.com/regionalprofile/hospital-beds/>) and Chang, C. 02/05/2013, "Health Minister Jillian Skinner unveils northern beaches private hospital plan", Manly Daily: <http://bit.ly/1g01ph7>

1. The proposed hospital is in the wrong location

The hospital as outlined in the Environmental Impact Statement (EIS) will be located at the south-western edge of the Northern Beaches region and just 20 minutes by car from the recently rebuilt Royal North Shore Hospital. Residents from the northern end of the region will have travel times of over half an hour in the absence of traffic delays. Once the Mona Vale Emergency Department is downgraded, emergency cases could face unacceptable access times

The roads leading to the proposed location already experience routine congestion at peak hours and during episodic flooding. These conditions could create a life-threatening situation for acute patients in ambulances trying to access the hospital. A hospital in this location will also increase ambient road traffic levels from admissions, out-patients, visitors, deliveries, waste removal and staff transit. This will have an impact on both the local community and the wider region commuter traffic.

The government has noted these challenges and acknowledged that extensive upgrades to the road network would be essential. However, the cost of works had been estimated at hundreds of millions of dollars which have not yet been budgeted. A detailed and audited traffic management report has yet to be finalised. It is thus impossible to know the scope, extent and cost of the necessary traffic work at this stage. It would be irresponsible to continue with the proposed hospital while this crucial determinant is unresolved.

Additionally, the proposed location is not accessible by fixed rail public transport. Buses will be vulnerable to the traffic congestion concerns noted above.

The proposed hospital location is not central to the region. It is an inappropriate choice given existing public health facilities and has been consistently opposed by the local community. Plans to progress the hospital without first determining the cost and feasibility of transport mitigation measures would be reckless.

2. The proposed hospital will have devastating environmental impacts

The location of the proposed hospital is also cause for environmental concern. The site is on the highly restricted and endangered listed Duffys Forest Ecological Community which provides a habitat for a number of protected flora and fauna species. The development would also sever a significant north-south wildlife corridor and compromise connectivity between substantial reserves. The government acknowledges the ecological sensitivity and high risk nature of the area yet has proposed an entirely unsatisfactory strategy to deal with the circumstances.

The government has proposed to offset the development by buying and maintaining an alternative habitat at Belrose. Protecting one environmentally significant area is not a solution to destroying another. Duffy's Forest is a unique habitat and cannot be simply "offset".

A recent review of the biodiversity aspects of this EIS conducted by the widely respected P & J Smith Ecological Consultants found that the impact of the proposal would be severe, that the proposed offset is "grossly inadequate" and that the offsets "may not even meet the very low requirements of the Office of Environment and Heritage's Tier 3 standard, which is the weakest offsetting option available"².

² Smith, P & J. November 2013, *Review of Biodiversity Aspects of Northern Beaches Hospital Environmental Impact Statement*, P & J Smith Ecological Consultants, p 6.

3. The proposed hospital will negatively and significantly impact on the local community

The current proposal is for a ten-storey building, 70,000 sqm of floor area and helicopter pads located on a natural rise. The structure and usage will dominate the primarily residential area. While the hospital is under construction, local residents will be forced to deal with years of building works. This will be accompanied with increased noise disturbance, traffic congestion, air pollution and impose an unacceptable burden on the community.

After the hospital is completed, helicopter and ambulance noise and light pollution will be a constant source of amenity loss for residents. The increased traffic from the shutdown of Manly hospital and the downgrading of Mona Vale will likely lead to overflow parking issues.

The proposal has not adequately considered the significant nature of the impact on the local community. While the Mona Vale and Manly Hospital locations are more insulated from residential communities, the proposed Northern Beaches Hospital would be situated in midst of residential zoning.

4. The proposed hospital will lead to the downgrading of comprehensive public health care

The Minister has confirmed that the proposed hospital will lead to the shutdown of Manly Hospital and a downgrading of the services provided at Mona Vale. Many local residents and the Greens are concerned that the downgrading of services at Mona Vale Hospital is the first step on the path to the eventual closure and sale of the ocean-front site. The Minister has refused to rule out “surplus” land sales at the site.

A petition of over 10,000 signatures tabled in the NSW Lower House earlier this year called on the government to retain funding for Mona Vale hospital and build on the existing health infrastructure services in the Northern Beaches. This shows that there is broad consensus amongst the Northern Beaches community and many local medical staff that the cost of building a new hospital would be better directed to these two existing, funds-starved hospitals.

The proposed new hospital, which would be constructed, maintained and managed by a private company, would see public patient care sacrificed to maximise profit. This has already occurred under public private partnerships at the Royal North Shore Hospital and Port Macquarie. Compared to the Royal North Shore, private involvement at the proposed Northern Beaches Hospital will be far greater and hence much more damaging to health care outcomes.

Conclusion

Downgrading hospital services and cutting costs by consolidating services have been an ongoing theme for this government. Hospital services at Bulli, Mullumbimby, Coraki and Bulahdelah and now Mona Vale and Manly are under the knife. This new model of health care provision has been foreshadowed by the Health Minister as the future of health services in NSW. This Coalition government is washing its hands of responsibility to provide appropriate health services to all.

The Greens believe that the government must provide the Northern Beaches region with an effective public health care system that reflects changing population trends and movements. The current proposal fails to achieve this outcome.