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Development Assessment Systems and Approvals
Department of Planning
GPO Box 39
SYDNEY NSW 2001
Attention: Director, Industry, Social Projects and Key Sites

Re: Proposed Northern Beaches Hospital at Frenchs Forest, **SSI 5982**

The following are comments objecting to the proposed site for a new private hospital.

ENVIRONMENT

The hospital can be built elsewhere, but the wildlife corridor and endangered Duffys Forest Ecological Community are endemic to the site and cannot be relocated.

SITE TOO SMALL

The hospital site is too small for a Level 5 hospital and the range of services that are proposed. The site to the east and a high school with little scope for expansion. The possible need to expand in the future would be a threat to the adjacent Forest High School.

HEIGHT TOO TALL

The 6-10 storey height of the building is a clear indication that the area of the site is too small to provide a more extended footprint that would reduce the height.

LOCATION

The location next to a major intersection has many drawbacks for a hospital site. The hospital would be impacted by a significant volume of traffic, most of which would not be destined for the hospital.

AMENITY

The amenity of the hospital would be adversely affected by exposure to air pollution and traffic noise. The area in the vicinity of the intersection is stressful for pedestrians and the hospital site could not be described as a health giving location.

TRAFFIC

The hospital would generate a significant amount of additional traffic that would exacerbate congestion at intersections and on roads in the surrounding area.

VISUAL IMPACT

The 10 storey building would be located on a ridge and have a visual impact on surrounding areas. A relevant criterion for development in the Narrabeen Lagoon Catchment is to protect scenic amenity. The EIS does not consider the impact on scenic amenity – or the precedent that would be established with a 10 storey building on the ridge.

WILDLIFE CORRIDOR

The wildlife corridor is not given any weight in the EIS.

PUBLIC verses PRIVATE

The existing two public community hospitals would be replaced by a single private hospital. Mona Vale Hospital would be reduced to only 66 beds with an uncertain ancillary role. Manly Hospital would be closed, but there is no indication of whether it would be retained for a public use, or what alternative health facility would be provided in the Manly area.

The net benefit for the provision of public hospital services on the Northern Beaches is negative.

ROYAL NORTH SHORE

The RNS is a Level 6 hospital that has been subject to a major upgrade in recent years. The construction of a new hospital in relatively close proximity is a duplication of costs and services.

COASTAL AREAS

The existing Mona Vale and Manly Hospitals are located on the coast, where the majority of the population on the Northern Beaches is concentrated. The two hospitals have provided a useful complementary role for many hospital services.

EEC

The hospital site contains the *Duffys Forest* ecological community (DFEC), which is listed as endangered under the Threatened Species Conservation Act, 1995. Reference to the map accompanying the NPWS listing reveals how little of this endemic forest remains.

RESERVE

The small size of the site is indicated by the acquisition and encroachment of reserve land for the hospital site. The previous State Significant Site retained this reserve, which was acknowledged to be part of the wildlife corridor.

BLINKING LIGHT RESERVE

The Blinking Light Reserve is “a small remainder of an original stand of DFEC situated on deeper shale soils of the ridgetop plateau” and its primary values are “the high conservation value of its vegetation, its important linking role in a major wildlife corridor and the scenic amenity it provides on a major arterial road”.

In February 2011 the Frenchs Forest Specialised Centre State Significant Site Study was on public exhibition and the accompanying maps show that both bushland lots within the Reserve would be retained.

The Study stated: “There is a continuous strip of trees on the Warringah Road frontage which have been zoned as open space and should be retained as the established canopy will add to the leafy character of the study area and attractiveness of the area as a whole.”

CONSULTATION

Public input has not been sought previously on the location of the hospital. To date there has been no objective planning assessment of the site, including its constraints, which are reflected in the requirement for a 10 storey building.

The two visioning forums were limited to 100 persons per session.

TIMING

Transport and traffic need to be considered in advance of any construction / clearance of vegetation. The EIS states that \$6.5m will be allocated for planning road upgrades and the community consulted “once the overall scope of the works has been determined”.

BIO-BANKING OFFSET

The 10 ha of bushland proposed for a bio-banking off-set is well short of the 35 ha required. Although 10ha of WMS land will be transferred to NPWS to improve management of the land, this bushland is already protected, so there is negligible compensation in terms of conservation.

The reluctance to invest in an adequate off-set is an indication of the extremely low priority given to the environment. The irreplaceable wildlife corridor and high conservation bushland is assigned a value substantially less than that of a single residential lot.

The unique values of the site will be sacrificed with negligible compensation for conservation while \$100's of millions to be spent on a hospital and road infrastructure.

ALTERNATIVE SITES

The option of an alternative site to avoid the loss of the wildlife corridor and EEC has not been considered in the application. In the previous Frenchs Forest SSS proposal, development was proposed on areas along the ridge to the east within the existing light industrial zone. The prospect of relocating the hospital to this vicinity has not been considered.

For a construction project estimated to cost \$600m for a new hospital, the acquisition of an alternative site would cost justified, even if the cost were \$20m, if it resulted in overall benefits for amenity, health and environment.

CUMULATIVE IMPACTS

The cumulative impacts on the environment are not considered in the EIS. This includes the loss of other bushland areas as a result of potential expansion of the hospital or road works.

SITE CLEARANCE

Clearance of the vegetation on the site is premature until construction works are due to begin. The vegetation fulfils a role in protecting catchments, providing habitat and contributing to the amenity of the area, and should only be removed as and when it is necessary.

LANDSCAPE AREAS

The small size of the hospital site will also limit the availability of land for landscaped areas, which provide a restorative function for patients, visitors and staff alike.

BOUNDARY of STATE SIGNIFICANT SITE

The boundary of the State Significant Site includes bushland areas alongside Wakehurst Parkway that also form part of a wildlife corridor. These remnants do not appear to be protected from future works associated with the hospital site.

LOCATION

The site of the existing two public hospitals were selected for their health giving locations - with sea air and scenic views. The location of the proposed new hospital has no such redeeming features. The scenic beauty of the existing site consists of its endemic vegetation, including its magnificent trees, which will be replaced with development.

The location of a hospital is a key land use decision. Yet the proposed location is flawed in many respects. In the interests of health, the hospital should be located on a more suitable site (away from the intersection) and the endemic forest protected.

FOREST AMENITY

The existing forest also provides a visual amenity with its beautiful trees. The concept plan for the hospital would replace the natural forest with tall buildings up to 10 storeys high.

The tall building would be out of context within the low density area, which includes the adjoining high school. The site is too small to provide substantial setbacks and would be highly visible from surrounding vantage points.

The hospital site is located on the watershed between bushland areas in catchments to the north and south. The endemic vegetation on the site has a unique status that is worthy of protection.

The hospital building will permanently change the forest character of the area to a built up environment that resembles medium and high rise areas in the city. The substantial impact on the character of the low density suburb and immediate environment has not been considered.

COST / BENEFITS

An expenditure of hundreds of millions on a hospital and infrastructure – focussed on a site that is too small and poorly located – will be a lasting legacy.

Expenditure on the hospital sites at Mona Vale and Manly would be a far better investment of public funds, as both sites are well suited for health purposes.

If the focus was on health in the holistic sense, then a much higher priority would be given to the environment, which is also related to health.

The cost of road infrastructure also needs to be factored into the equation. What will be the cost and is this likely to increase car dependency and create congestion elsewhere?

ENERGY

EIS s3.2

Jemena has advised that the metering pressure for the natural gas service would be 35 kPa and the natural gas service would extend to supply the following:

- *Domestic hot water heating plant*
- *Commercial kitchens*
- *Mechanical boilers*
- *Tri-generation plant (if required).*

The energy source for the hospital would be gas – the EIS makes no mention of solar. The high rise building limits the scope for solar panels on roof tops. However, there are other options to avoid total reliance on gas, which is a non-renewable resource, for example:

- Domestic hot water can be supplied efficiently using (at least some off-peak) electrically powered heat pump technology. There are then no combustion emissions.
- Commercial kitchens are well powered by electrical resistive and microwave ovens, plus induction rather than gas hobs.
- Heat pump technology can effectively supply cooling as well as heating. Chill can be stored probably as effectively as heat in water.
- Some rooftop solar would not go amiss.

QUESTIONS

If the site eventually proves to be too small, what nearby land would be taken over?

Will Manly Hospital be retained for a public purpose?

How viable will Mona Vale be as a public hospital?

ADDITIONAL COMMENTS

ENVIRONMENT

The development would impact upon endemic forest that forms part of a wildlife corridor. The forest has historical significance as a remnant of the tall forest that once covered the ridge area. The proposal would remove and adversely affect the already limited area of endangered Duffys Forest Ecological Community and substantially reduce the bushland corridor that extends across the ridge.

ROADS / TRANSPORT INFRASTRUCTURE

It is premature to focus on constructing a new hospital at Frenchs Forest when transport is not resolved. Transport is on the cusp of change and new technology has the potential to transform our mode(s) of transport.

To launch forward now with grandiose plans to rebuild the road infrastructure – which would only accommodate and encourage more cars is an out of date approach to planning.

Our first priority should be to look at the type of society we want to live in and establishing infrastructure that will substantially reduce our dependence on non-renewable resources, such as oil.

The transport issue does not merely focus on Frenchs Forest, but needs to look beyond to encompass the Northern Beaches. Transport criteria include:

- Low environmental impact
- Above ground (preferably)
- Suit terrain, environment, scenic amenity
- Compatible with cycling and walking

The possible widening of Wakehurst Parkway would have a devastating impact on wildlife, bushland corridors, reserves and the recreational use of adjoining areas. It would also generate more traffic contributing to further congestion elsewhere. A preferred outcome would be to improve public transport / bicycle safety along the Parkway.

The Northern Beaches Hospital site cannot be considered in isolation of transport, which in itself is a major investment. Adequate lead time is required to allow for holistic planning that encompasses transport, environment, health and other services.

HOSPITAL SITE

The land available to construct a major hospital at the Frenchs Forest site is very limited.

Relevant queries include:

- Is there adequate space for a major public hospital on this site?
- Where would helicopters land?
- If the hospital were to expand, how would this affect Frenchs Forest High School (FFHS) and what alternative site would be available for the school if it was forced to move?
- If large areas of Frenchs Forest precinct near Warringah Road were proposed to be redeveloped – is there a better location for the hospital / health facility?

An alternative site would allow endangered *Duffys Forest* ecological community and wildlife corridor to be protected. The forest is part of the heritage suburb, thus the name: Frenchs Forest.

The hospital site is reserved for health purposes, but does not appear large enough to accommodate ancillary services and allow for future expansion of a major hospital.

The Frenchs Forest hospital site has a number of significant constraints including traffic, access roads, limited land area as well as environmental constraints. Opportunities do exist for health related services but not necessarily for a full scale hospital.

FRENCHS FOREST HIGH SCHOOL

The RNSH has a much larger land area than the FF hospital site - raising another concern – that the only available land for the expansion of the hospital is Frenchs Forest High School.

Frenchs Forest High School has a wide catchment area, particularly with the disposal of Beacon Hill High School, which closed in 2003. At the time, the Department of Education claimed that population predictions did not justify the retention of the high school. However, since then, numbers in local primary schools have continued to rise.

MONA VALE / MANLY HOSPITAL SITES

In the meantime, the two existing hospitals, both located in scenic spots, ideally suited for public health uses, could be upgraded to provide essential health related services, including accident / emergency.

Both Manly and Mona Vale hospital sites were especially chosen because of their suitability for a hospital / health services. The features of these two sites, such as coastal location and scenic views contribute to their amenity for public health. It is important that these public sites are RETAINED.

Mona Vale hospital site has locational advantages for the Pittwater Area and coastal areas of Warringah. Frenchs Forest is too far to conveniently service the northern part of Peninsula. For this reason, emergency facilities would have to be maintained at Mona Vale.

Strategic advantages of health / hospital facilities in Manly also need to be recognised: Near to ferry wharf and buses; accessible to CBD; services coastal areas with steady influx of visitors / tourists.

These two district hospitals were established when the population was much lower than it is today. Yet now, with so many more people, the proposal is to two public hospitals, which have served the community well for many years, with a single private hospital that is located further away from the coast.

There is also a need for an increase in mental health facilities on the Northern Beaches. However, the Frenchs Forest site, adjacent to a busy intersection, is not particularly suited for this purpose.

Financial resources might also need to be directed towards training of health professionals – including specialists and nurses, as there is already a shortage. What guarantee that there will be enough nurses for existing and new hospital on Northern Beaches?

RNSH

The travel times show that Frenchs Forest Hospital site is within 20 mins of RNSH. This raises the pertinent question, as to why we need another major hospital so near to an existing facility (RNSH), which has much more scope for expansion?

Sincerely, Ann Sharp