

10300  
30 June 2010

Mr Sam Haddad  
Director General  
NSW Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

Attention: Daniel Cavallo, Acting Director, Government Land and Social Projects

Dear Mr Haddad

## **SYDNEY CHILDREN'S HOSPITAL, HIGH STREET, RANDWICK - LOT 1 DP 870720**

We are writing on behalf of Health Infrastructure - NSW Health, the proponent for an extension to the Sydney Children's Hospital (SCH) at Randwick.

The purpose of this letter is twofold:

- firstly, to seek the Minister's opinion as to whether the proposal is a development of the kind described in Schedule 1 (Part 3A project - classes of development) of State Environmental Planning Policy (Major Development) 2005 (the Major Development SEPP) and is therefore a 'major project' to be determined under Part 3A of the *Environmental Planning & Assessment Act, 1979* (the EP&A Act); and
- secondly, to request that, if the proposal is a Part 3A project, you issue your requirements for the preparation of an Environmental Assessment to accompany a Project Application for the proposed development.

This letter outlines the project, describes the site and the locality, and provides the statutory planning context, with the matters under the Major Development SEPP dealt with in Section 3.2. To support the request for the Director-General's Requirements (DGRs), a Preliminary Environmental Assessment (PEA) of the project identifying the key likely environmental planning issues associated with the proposal follows.

## **1.0 THE PROJECT**

### **1.1 Background**

Sydney Children's Hospital, at Randwick (see **Figure 1**), is a state wide Level 6 tertiary teaching hospital for paediatrics and child health. It provides a comprehensive range of services and is the hub of an extensive and well developed clinical network. It is also a part of, and a lead agent for, the South Eastern Sydney Illawarra Area Health Service (SESIAHS).

The SESIAHS has identified over time that several services located within the SCH are not meeting the required standards for a Level 6 tertiary facility due to inferior physical accommodation and poor functional relationships. These are: Child and Adolescent Mental Health Services (CAMHS) - Inpatient Services; Short Stay and Ambulatory Care Services; and Paediatric Rehabilitation Services.

All have undergone several operational reviews and some refurbished over the past years to maximise their effectiveness in their current locations but without significant capital investment. Following extensive review, strategic planning and options development it was determined that redevelopment would be the only way to address operational efficiencies and service improvements for the aforementioned services.

In planning redevelopment for the CAMHS, it was deemed sensible to combine this with the other services at the SCH that also need addressing in order to create one project and realise efficiencies in time, resources and capital planning. The resultant scope of services approved for inclusion in the proposed development are listed in Section 1.2 below (Source: *Combined Services Procurement Plan/ Project Definition Plan for the Child & Adolescent Mental Health Inpatient Unit and SCH Clinical Services Development, December 2009*).

The preferred option, the subject of this application, is considered to be a high priority by NSW Health, the SESIAHS and the hospital. It has been subject to the internal review and approval processes of NSW Health and NSW Treasury, has been endorsed through both quantitative and qualitative assessment, and is documented in the abovementioned Combined Services Procurement Plan/ Project Definition Plan (CSPP/PDP).

A substantial proportion of the funding for the development is to come from private sector fundraising through the Sydney Children's Hospital Foundation, with the balance from the NSW Health Capital Program and a small grant from the Motor Accident Authority.



Figure 1 - Sydney Children's Hospital - main entrance on High Street

## 1.2 Proposed development

With a capital investment value (CIV) of approximately \$22.77 million, the project consists of the construction of a five (5) storey purpose-built infill building on the Sydney Children's Hospital site, within the Randwick Health Campus. The building is designed to maximise the potential of the limited site area (2125 square metres) and will be constructed as a stand alone structure with connections 'punched' into the existing SCH building.

The development will provide approximately 5,300 square metres of floor space for the following children's health services:

- CAMHS inpatient unit of eight (8) beds, plus accommodation for health service personnel and administration built to contemporary standards and regulations.
- Paediatric Rehabilitation Services to operate as a state-wide multidisciplinary team for the Brain Injury Program, Cerebral Palsy Service, School Therapy Team, inpatient rehabilitation services, Spinal Clinic, General Rehabilitation Clinic and the Limb Management Clinic, and the Gait and Motion Analysis Service.
- Day only/ short stay (peri-operative) facility consisting of 27 day bed spaces to consolidate multiple surgical and procedural functions from more than five current locations.
- Treatment and consultation area for Respiratory Medicine and consultation area for Child Protection Services.

Concept sketches of the proposed development, prepared by BVN, are provided at **Attachment 1**.

A range of spaces including courtyards are proposed for recreational and therapeutic activities, including an 'Activity Courtyard' specially designed for the use of children and adolescents with mental illness or behavioural issues.

The objective of the development is to redress operational and accommodation inefficiencies within the hospital, and is not intended to increase patient numbers or create new services.

## 1.3 Project program

Construction is intended to commence in May-June 2011 with occupation by October 2012.

## 2.0 THE SITE AND CONTEXT

### 2.1 Locality

The SCH is located on High Street, Randwick, in the northern part of the Randwick local government area (LGA), within the north western portion of the Randwick Health Campus (see **Figures 2 and 3**). The wider locality is largely occupied by medical and educational institutions and associated uses. The main institutions in the medical precinct - other than SCH - are the Royal Hospital for Women (RHW), the Prince of Wales Hospital (POWH), and Prince of Wales Private, as well as various medical/health related facilities situated in the southern part of the precinct, including the Ambulance station and the recently approved Neuroscience Research Precinct. The Randwick town centre is to the north east and UNSW to the west.

To the immediate west of the SCH, across Hospital Road, are the backyards of single dwellings located on Eurimbla Avenue - of which five or six would interface with the proposed development.

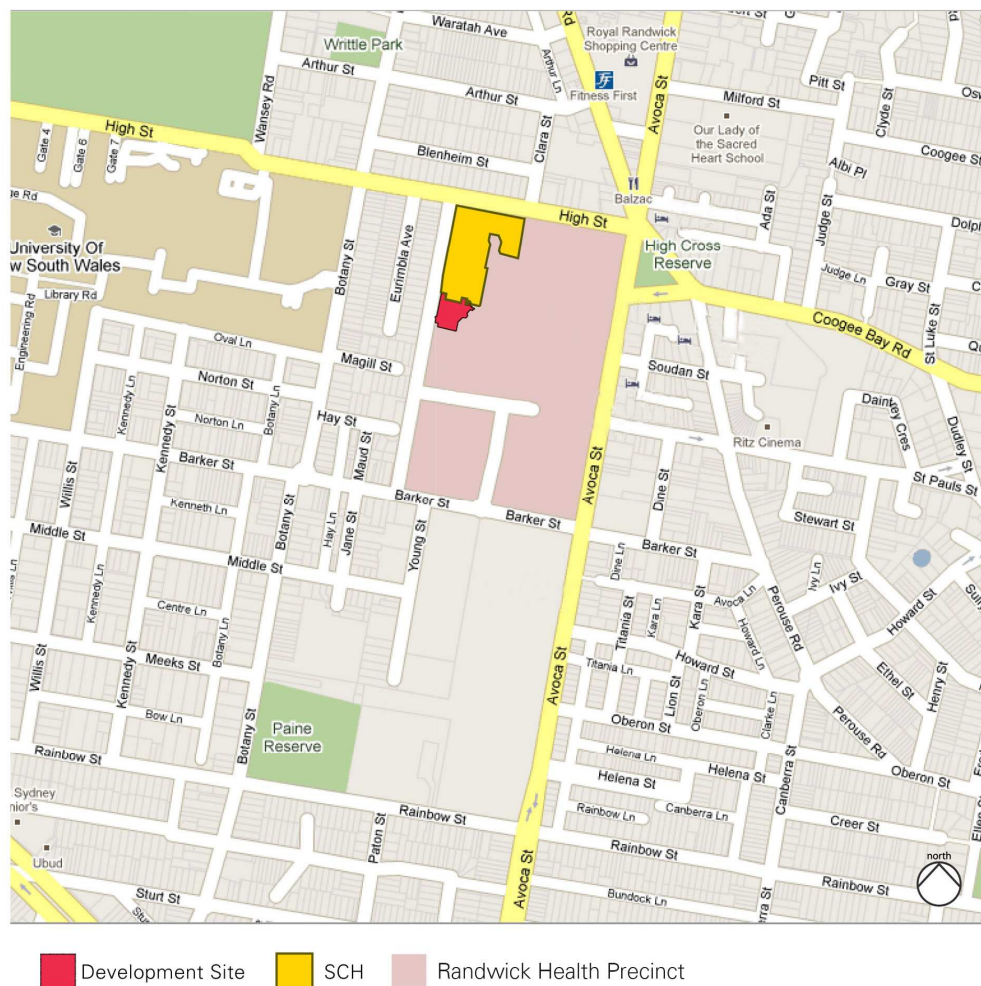


Figure 2 - Locality plan





Figure 3 - Site context plan

## 2.2 The site

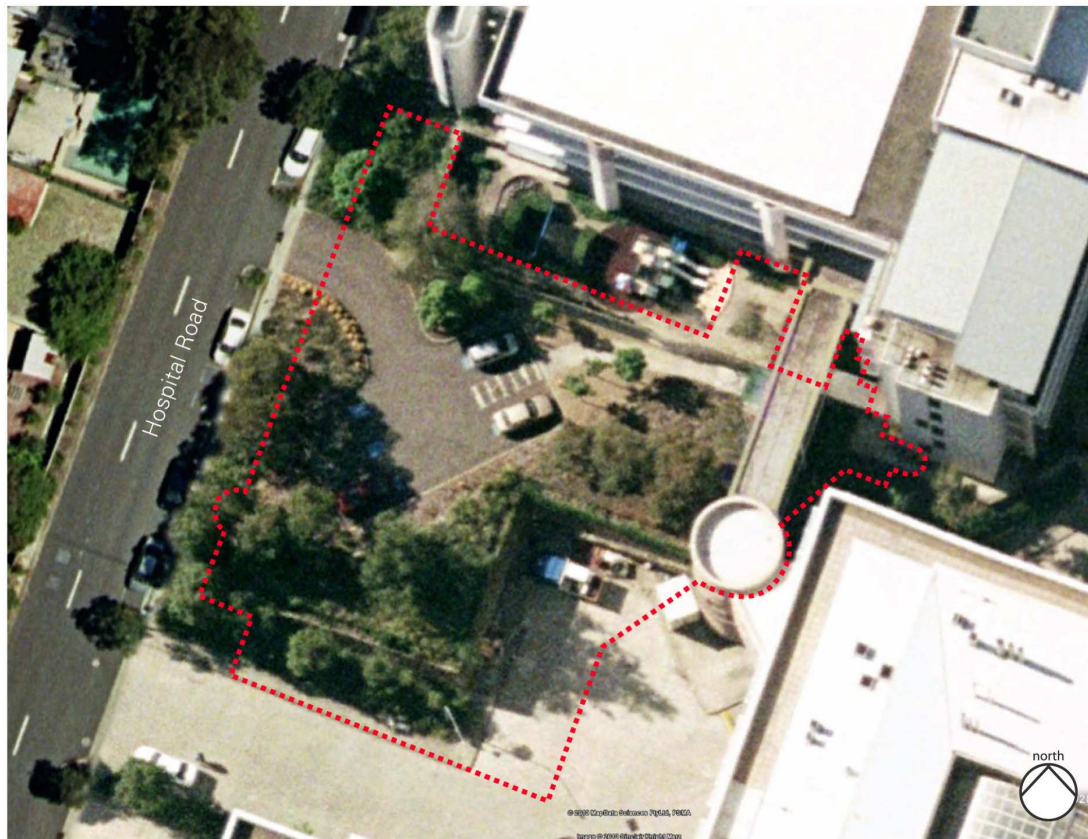
The site for the proposed development is shown in **Figures 4 and 5** and in the site survey at **Attachment 2**. The land is part of one large lot owned by the Health Administration Corporation legally described as Lot 1 in DP 870720.

SCH fronts High Street and the development site is to the rear of the existing building along Hospital Road, a private road running north south from Barker Street to High Street on the western edge of the Randwick Health Campus. With a footprint of 2125 square metres in area and accessed to its west from Hospital Road, the development site is surrounded on three sides by existing hospital buildings, as follows:

- to the north: the rear of SCH - 4 storeys in height (see **Figure 6**);
- to the east: the Prince of Wales Public and Private hospitals and - 8 storeys (see **Figure 7**) and existing two storey walkway which links the SCH with the other hospitals on the site; and
- to the south: the rear of the Royal Hospital for Women - 6 storeys (see **Figure 8**).



As indicated above, the site is bounded to its west by a two lane private road - Hospital Road - which is used for deliveries and for vehicles exiting the car park located on southern end of the Campus.



..... Development Site

**Figure 4 - Development site**



**Figure 5 - View of development site from existing SCH building**





**Figure 6 - Rear/southern facade of SCH**



**Figure 7 - Part western facade of POWH and POW Private**



**Figure 8 - Rear/northern facade of RHW**

### 2.3 Existing development

As shown in **Figure 4** above and in those below, the area to be used for the extension is currently occupied by:

- an outdoor rehabilitation area;
- a parking /drop-off area for mobility impaired patients who can access the hospital through a door to the internal walkway (**Figure 9**);
- a sloping driveway which accesses the loading docks/delivery areas for SCH, POWH and RHW (**Figure 10**) and a small service yard (**Figure 11**); and
- landscaping/plantings.

These will be treated as follows as a result of the development:

- The outdoor rehabilitation area will be retained *in situ* and re-landscaped, but reduced slightly in size on its eastern and western ends.
- The patient drop-off parking spaces will be relocated along Hospital Road in much the same location and access to the SCH walkway will be retained *in situ*.
- The garden/landscaped area will be demolished.
- The driveway to the loading areas and service yard will continue in their current locations and the driveway will continue to operate during construction. (Note: the new structure is built above the sloping driveway).



Figure 9 - Disabled access patient drop-off/parking





Figure 10 - Delivery driveway



Figure 11 - Service yard and driveway (to left)

### 3.0 RELEVANT PLANNING PROVISIONS

The following strategic plans, and state and local environmental planning instruments, apply to the proposed development:

- Metropolitan Strategy;
- East Subregion Draft Subregional Strategy
- NSW State Plan;
- State Environmental Planning Policy (Major Development) 2005;
- Randwick Local Environmental Plan 1998.

The Randwick Health Campus - Masterplan Principles Review (prepared for the SESIAHS) sets master planning principles for the future development of the campus, but is largely not relevant to this infill development.

### 3.1 Zoning and Permissibility

Randwick Local Environmental Plan 1998 (LEP) is the principal statutory planning instrument applying to the site. Under the LEP the site is zoned Zone No. 5 (Special Uses). The proposed development is permissible with consent and the consistent with the zone objectives set out below:

- "(a) to accommodate development by public authorities on publicly owned land, and*
- (b) to accommodate development for educational, religious, public transport or similar purposes on both publicly and privately owned land, and*
- (c) to enable associated and ancillary development, and*
- (d) to allow for a range of community uses to be provided to serve the needs of residents, workers and visitors, and*
- (e) to allow for the redevelopment of land no longer required for a special use.*

There are no development standards in the LEP which pertain to the development or the site. Specifically, the LEP does not set height or FSR controls for the zone, and the requirement for a master plan on sites greater than 10,000 square metres (Cl.40A) does not apply.

Under clause 37A (Development in Special Uses Zone) the Council may only grant consent to the development of land within Zone No 5 if it is satisfied that the proposal is compatible with the character of the locality and will not adversely affect the amenity of nearby and adjoining development. As indicated above, the proposed development involves an infill building sandwiched between existing hospital buildings - accordingly, it is consistent and compatible with the character of the locality. Potential impacts on adjoining residential development on Eurimbla Avenue will be assessed during preparation of the EAR and managed through detailed design (see Section 4.2 below).

### 3.2 Major Development SEPP 2005

Clause 6(1) of the Major Development SEPP provides that development that, in the opinion of the Minister, is development of a kind described in Schedule 1 (Part 3A project - classes of development) is declared to be a project to which Part 3A of the *Environmental Planning and Assessment Act* (EP&A Act) applies.

'Hospitals' are covered in Clause 18 of Schedule 1 as follows:

*"Development that has a capital investment value of more than \$15 million for the purpose of providing professional health care services to people admitted as in-patients (whether or not out-patients are also cared for or treated there), including ancillary facilities for:*

- (a) day surgery, day procedures or health consulting rooms, or*
- (b) accommodation for nurses or other health care workers, or*
- (c) accommodation for persons receiving health care or for their visitors, or*
- (d) shops or refreshment rooms, or*
- (e) transport of patients, including helipads and ambulance facilities, or*
- (f) educational purposes, or*
- (g) research purposes, whether or not they are used only by hospital staff or health care workers and whether or not any such use is a commercial use, or*
- (h) any other health-related use.*

*(2) For the purposes of this clause, professional health care services include preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, care or counselling services provided by health care professionals."*

As stated above, the CIV of the project is approximately \$22.77 million. Accordingly, the proposed development would be a major project to be dealt with under Part 3A of the Act.

#### 4.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

This section outlines the key environmental issues and impacts which could potentially arise from the proposed development. Each is summarised below and will be addressed in the Environmental Assessment Report (EAR) that will accompany the Project Application.

There are no negative social and economic issues associated with the proposed development which augments and expands an existing medical use. It will provide essential medical and, in particular, mental health, services for children and adolescents. In accordance with standard NSW Health practice, an Aboriginal Health Impact Statement was prepared and is addressed in the CSPP/PDP (referred to above).

The proposal involves a relatively small infill extension sandwiched between existing buildings of like use and of the same or greater height. Given this, there are few environmental issues relevant to the proposal, and all are able to be managed and mitigated through building design or construction management. At this stage, the following may be relevant to the project:

- pedestrian access, traffic, and parking
- interface issues and residential amenity;
- operational noise/acoustic impacts;
- stormwater management;
- ESD;
- geotechnical conditions; and
- pedestrian access and drop-off, traffic, dust and noise during construction.

##### 4.1 Operational access, traffic and parking

The new extension will not increase current requirements for parking, transport and access as the patient services already exist within the hospital. Accordingly, no traffic and access issues are expected to arise from the operation of the development. It will not increase traffic as, for the most part, the existing services and patient numbers will be relocated from elsewhere in the hospital, and existing general drop-off arrangements and general patient/family/visitor parking will not change.

In relation to pedestrian access, the extension is placed half way between the High Street main entrance to the SCH (bus access), the POWH main entrance and the car park. All patient access floors will be contiguous with similar types of facilities on those floors so providing alternative lift access. Existing pedestrian access from Hospital Road to the walkway has been retained for access by disabled access and rehabilitation patients and others.

The existing disabled access parking on the site will be relocated to Hospital Road as perpendicular parking.

The driveway to the loading docks will continue to operate in its current location and the service yard/loading bay area will also be retained.

A traffic management assessment and an access and mobility report will be submitted with the EAR.



#### **4.2 Interface issues and residential amenity**

The proposed development will interface with several one- and two-storey single dwellings on Eurimbla Avenue. These dwellings already interface with the current activities and buildings on the Health Randwick Campus.

As previously mentioned, the extension is sandwiched between existing hospital buildings of comparable or greater height. It is not expected to obstruct any views but will be visible from the houses along Eurimbla Avenue that back onto this part of Hospital Road. The rear outlook from these houses (principally at 29 to 39 Eurimbla Avenue) is currently of the much taller western facades of the POWH and RHW buildings. The new view will be of the closer, albeit lower, SCH extension. The impact will be assessed in the EAR.

The extension is not expected to overshadow the backyards of dwellings along Eurimbla Avenue, however, this will be ascertained during detailed design and a shadow impact assessment will be submitted with the EAR.

It will be potentially possible to overlook the backyards of a number of dwellings on Eurimbla Avenue from the upper storeys of the extension. This will be addressed and mitigated as part of the detailed design of facility, and an assessment will be provided in the EAR.

#### **4.3 Operational noise**

An acoustic impact assessment will be undertaken for the EAR into potential impacts from plant and equipment on the acoustic amenity of residents on Eurimbla Avenue. The EAR will propose measures to mitigate any noise if required.

#### **4.4 Stormwater management**

Stormwater run-off from the proposed extension will be detained on site. A stormwater management plan will accompany the EAR.

#### **4.5 ESD**

Health Infrastructure has identified opportunities for Environmentally Sustainable Design in the design, construction, finishing and fit-out of the proposed building including compliance with NSW Health /AHFG Environmental initiatives, the BCA and state government policy.

#### **4.6 Geotechnical conditions**

The new building will partly involve piling and slab-on-ground construction (on existing rock). Geotechnical investigations of the site will be undertaken to inform detailed design and reported in the EAR. Given the extent of development on the Campus, no unexpected conditions are expected.

#### **4.7 Construction impacts**

The construction of the building will take place over an approximate 16 month period and be akin to a CBD development with all activities to be confined to the site area and impacts on surrounding buildings minimised. Nevertheless, construction will generate noise, dust and traffic with the impacts extending beyond the confines of the development area. In addition, some access arrangements will need to be temporarily changed.

The loading areas and docks and the access driveway will continue to operate during construction, but the parking spaces currently in the service yard/area will be temporarily located to Hospital Road (an internal private road). During construction, Hospital Road will temporarily operate as a one-way street with one lane closed to accommodate parking and construction loading/delivery etc.

Similarly, the existing pedestrian access for disabled access and rehabilitation patients from Hospital Road to the walkway (described above) will continue to operate but the parking spaces will be relocated to Hospital Road.

A Construction Management Plan will be prepared by the proponent to manage and mitigate the impacts of construction. This will include sub-plans in relation to pedestrian/patient access and drop-off; construction traffic; other traffic and deliveries; noise; and air quality,

## 5.0 CONSULTATION

The SESIAHS Corporate Communication Team has been an active participant in the development of the proposed new facility to ensure that staff, patients, their families, and other stakeholders are kept informed about the key components of the project and any implications for service delivery. This will continue.

In addition the proponent together with the SCH Foundation will engage with the residents of Eurimbla Avenue in relation to the potential impacts of the proposed facility - during construction and on completion.

Randwick City Council officers were briefed on the project on 17 June 2010 and DoP officers were consulted on 18 June 2010.

## 6.0 CONCLUSION

We trust that the above information is sufficient to assist in determining that the project falls under Part 3A of the EP&A Act and to enable you to issue your requirements for the preparation of the necessary Environmental Assessment.

As indicated above, this project is a high priority for NSW Health and for the treatment of children and adolescents with mental health problems. Accordingly, we look forward to your early response as Health Infrastructure is seeking to secure project approval by the end of this year in order to commence construction as programmed.

Should you have any queries or require further information, please do not hesitate to contact me on 9409 4927 or [vgoldschmidt@jbaplanning.com.au](mailto:vgoldschmidt@jbaplanning.com.au).

Yours sincerely



Vivienne Goldschmidt  
*Associate*

Attachments