

16 May 2019

Jim Betts
Secretary
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2001

Dear Mr Betts

Randwick Campus Redevelopment – Integrated Acute Services Building Addition Prince of Wales 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) 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 a State Significant Development (SSD) application for the Integrated Acute Services Building Addition to the Randwick Campus Redevelopment (the Project) in Randwick (the site).

The Project is classified as a "hospital and health research facilities" in accordance with Clause 14 of Schedule 1 of the SRD SEPP and has an estimated Capital Investment Value (CIV) of \$55,000,000. On that basis SEARs are sought for the preparation of the Environmental Impact Statement (EIS).

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

1 Background

SSD 9113 for the Acute Services Building (ASB) was approved on 27 February 2019. The approved ASB building is located to the immediate west of the existing Randwick Hospitals Campus (Campus), occupying a key position between the Campus and the University of New South Wales (UNSW).

In order to assist in realising the vision for the Randwick Health and Education Precinct an addition to the approved ASB building is proposed to create opportunities for UNSW to integrate health related academic and translational research activities collocated within the ASB.

The proposal to be known as the Integrated Acute Services Building (IASB) addition includes:

- Research Governance & Collaboration Spaces
- Clinical Research Facility
- Clinical Innovation and Translation Spaces
- High tech Interventional Suite and Clinical Translational Laboratory
- Bioengineering Innovation space
- Clinical Research Spaces.

2 Locality

2.1 Regional Context

The site is located approximately 6 kilometres (km) from the Sydney Central Business District (CBD) in the Randwick Local Government Area (LGA). It is approximately 4km from Sydney Airport. **Figure 1** provides a regional context map of the site showing its location with regard to the Sydney CBD and nearby centres.

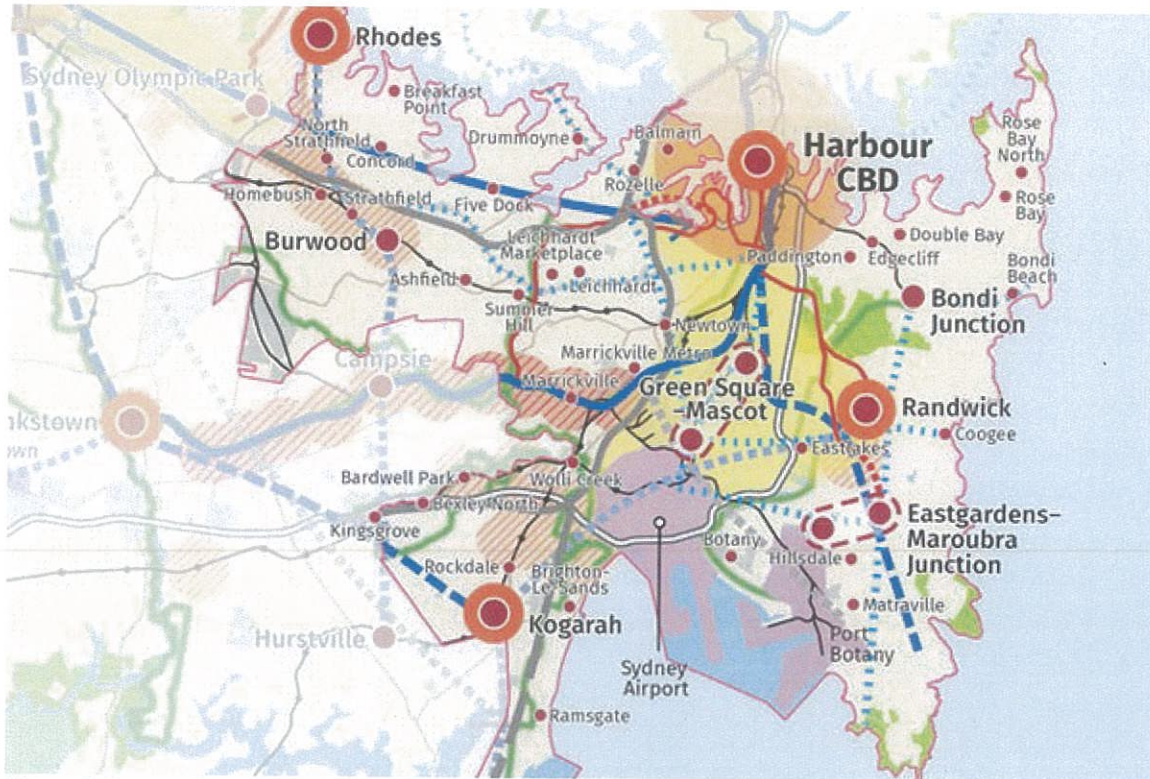


Figure 1: Regional context map of the site (Source: Eastern City District Plan)

The site forms part of the South East Sydney Local Health District (SESLHD), which is one of 19 Local Health Districts and Specialty Health Networks in NSW. SESLHD covers the LGAs of Woollahra, Waverley, Randwick, Botany Bay, the City of Sydney, Lord Howe Island, Rockdale, Kogarah, Hurstville and Sutherland (Figure 2).

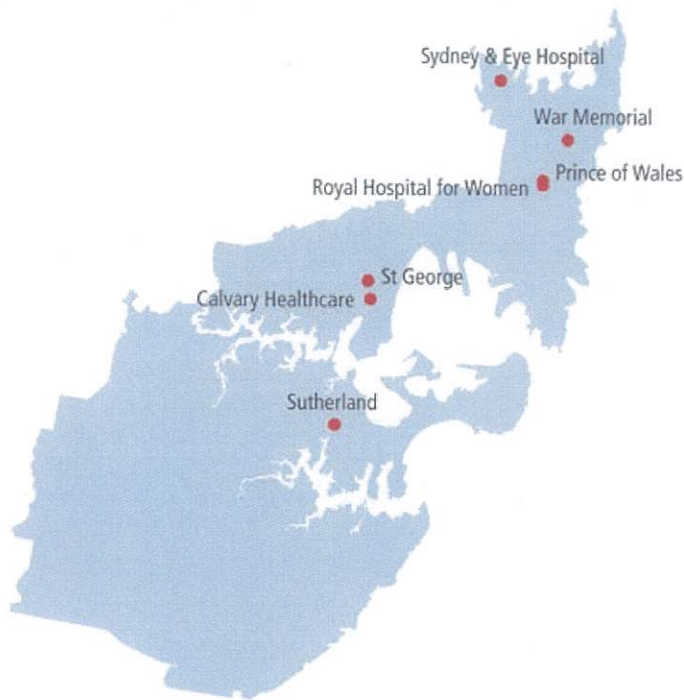


Figure 2: SESLHD Catchment (Source: NSW Health)

Construction of the City and South East Light Rail along High Street is nearing completion, opening late 2019. High Street is a major frontage for both the UNSW and Hospitals Campuses. The new Light Rail is a key driving factor for revitalising the High Street frontage and presents a major opportunity for the broader Health and Education Precinct. It will, however, drive a change in transport modality across the campuses and will require a re-planning of access points for existing services, including to the Sydney Children's Hospital Emergency Department.

2.2 Local Context

The approved ASB site is known as 27 – 37 and 34 – 66A Eurimbla Avenue, 71 – 101 Botany Street, and 2 – 14 Magill Street, Randwick and also includes part of the existing Randwick Hospitals Campus. The existing Randwick Hospitals Campus has an area of approximately 13.26 hectares (ha) known as Lot 1 DP870720 and sits immediately to the south of Randwick Town Centre. The Kensington Campus of UNSW is located on Botany Street, west of the Hospitals Campus.

The approved ASB site has an area of some 2.13ha and is bounded by Hospital Road to the east, Botany Street to the west, vacant land and High Street to the north, and Magill Street to the south. The boundary of the ASB site is shown in **Figure 3**, the IASB proposal is an addition to the eastern façade, over Hospital Road.

Land to the north of the ASB site would be the subject of separate development proposals, which are still in early stages of development.

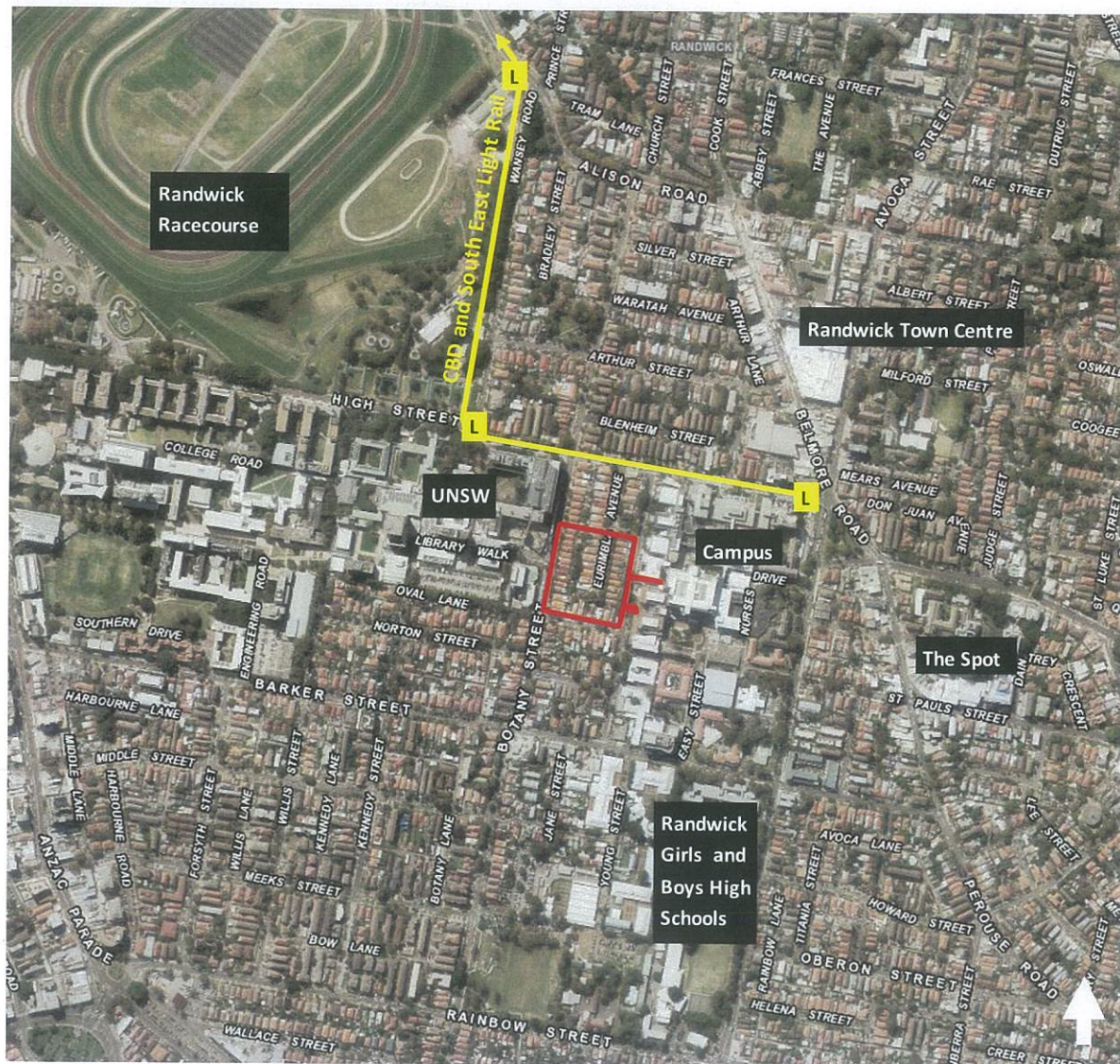


Figure 3: Aerial imagery of the site that is marked in red (Source: SIX Maps)

3. Description of the Project

The construction of the new IASB addition comprises a gross floor area of approximately 5,500m², of which 250m² is within the existing floor plan of the ASB. The IASB is shown in **Figure 4 & 6**, noting that further detailed design is underway on the façade and other aspects of the addition. To enable the IASB addition, services need to be diverted and a section of Hospital Road needs to be lowered, as shown in **Figure 5**.

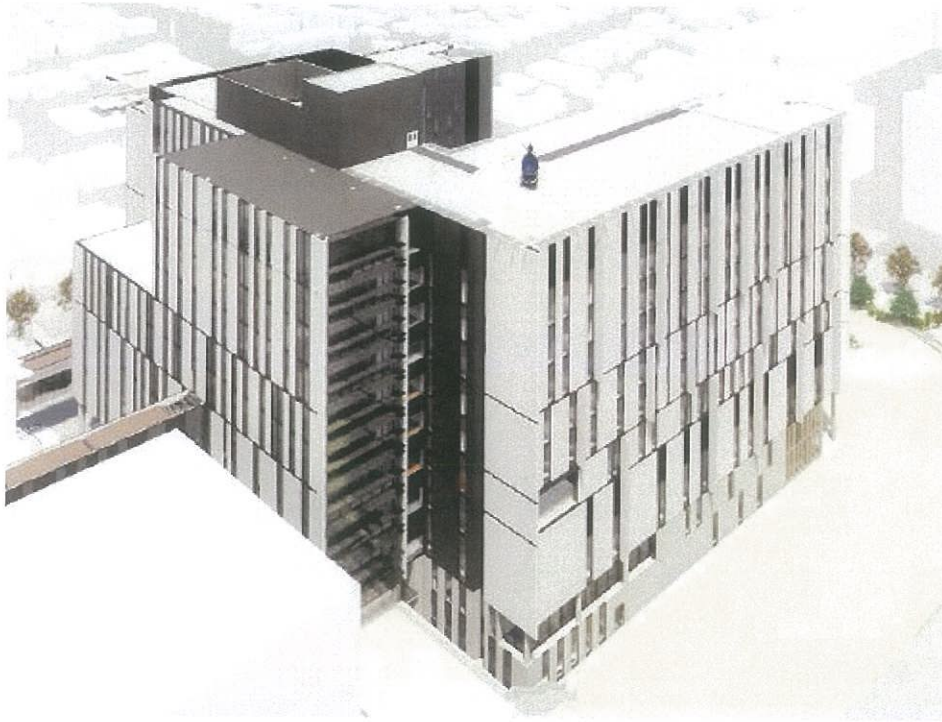


Figure 4: Northern elevation massing view of proposed ASB (Source: BVN, 2019)

Development consent is proposed to be sought for the following:

- Bulk excavation
- Site preparation works including shoring and piling
- Diversion of utility services and stormwater infrastructure in Hospital Road
- Lowering of Hospital Road and closure of Hospital Road from Barker Street to High Street while maintaining vehicular access to the loading dock and staff car park off Barker Street
- Construction of a nine level addition to the ASB building with an approximate maximum building height of 46m comprising the following uses, noting that some reordering and refinement may occur during design development:
 - Level 00 Clinical Innovation Research Space
 - Level 00 (Mezzanine) Clinical Research Space
 - Level 01 Clinical Translational Lab Space
 - Level 02 Clinical Translational Lab Space
 - Level 03 Bio engineering Innovation Space
 - Level 04 Bio engineering Innovation Space
 - Level 05 Health Education and Research Space
 - Level 06 Health Education and Research Space
 - Level 07 Health Education and Research Space
 - Level 08 Health Education and Research Space
 - Level 09 Plant Room
- A three level bridge for clinical and operational connections to the existing Hospitals Campus
- A separate one level public bridge for connection to existing hospital campus.
- Building services infrastructure and connections to utilities
- Stormwater drainage infrastructure.

The schematic design of the proposed IASB addition and the lowering of Hospital Road is shown in the drawings contained in Attachment 1.

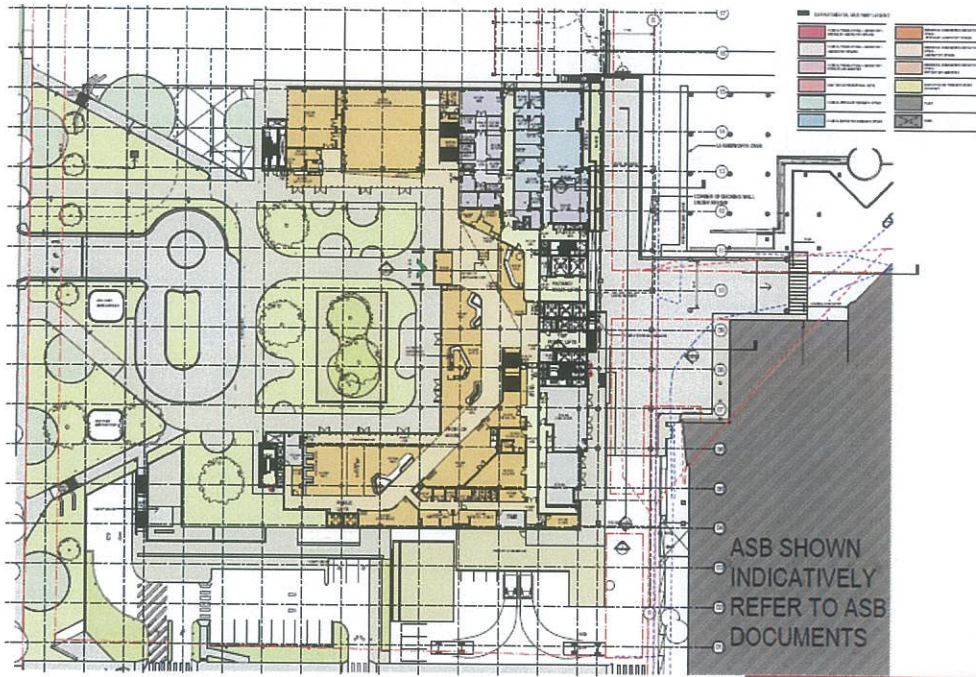


Figure 5: Proposed IASB showing lowering of Hospital Road (Source: BVN, 2019)

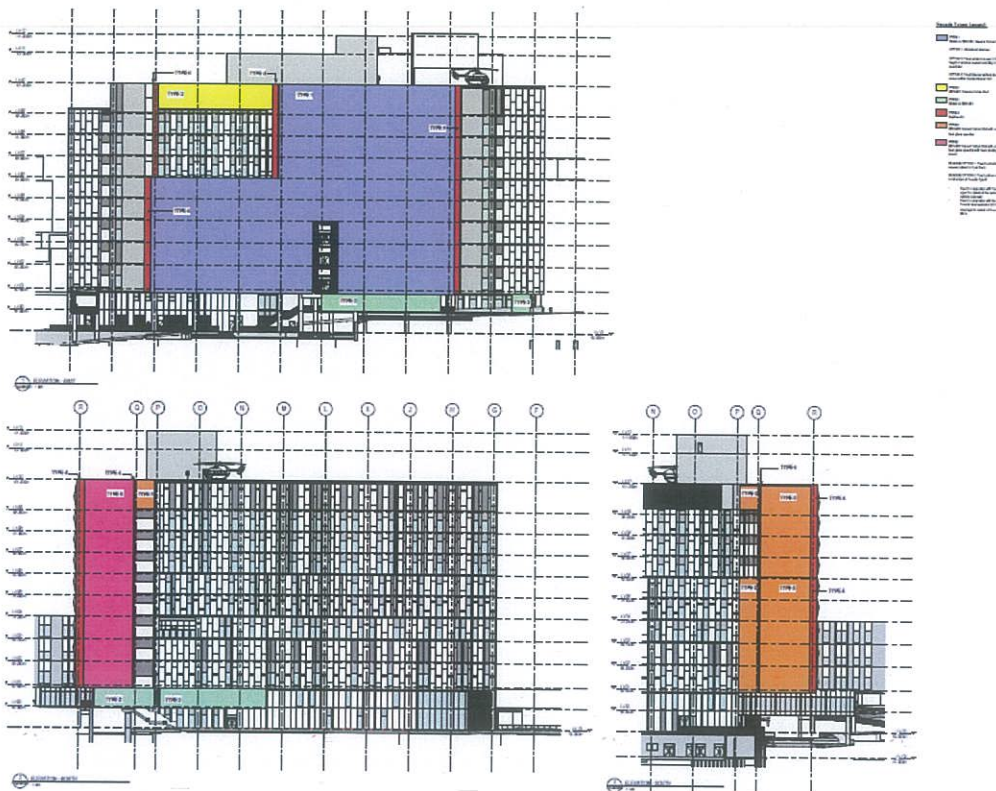


Figure 6: Proposed IASB Elevations (Source: BVN, 2019)

4 Capital Investment Value

The estimated construction cost for the proposed IASB addition is approximately \$55,000,000. This figure will be confirmed in a detailed Quantity Surveyor's Cost Report that will accompany the Environmental Impact Statement (EIS).

5 Strategic Planning Context

5.1 NSW State Plan

The NSW Premier has recently re-written the NSW State Plan to sharpen its focus on 12 Premier's Priorities. The Project is consistent with three of these priorities as it will: (1) create jobs during construction and the ongoing operation of the IASB; (2) create new infrastructure; and (3) investing in health services through the integration of education, training and research activities with core clinical services.

5.2 The State Infrastructure Strategy 2018

The *State Infrastructure Strategy 2018 – Building Momentum State Infrastructure Strategy 2018-2038* (the Strategy) which sets out Infrastructures NSW's advice on the current state of NSW's infrastructure and needs and priorities over the next 20 years. The Strategy focuses on multiple sectors and provides strategies and solutions to advance infrastructure within each of the sectors. The main objective of the Strategy is to enable the NSW Government to plan and deliver infrastructure successfully.

Two key snapshots from this strategy are;

- *In the next 20 years, the demand for healthcare will grow by over 50 per cent, compared to population growth of 28 per cent. The highest rates of growth are expected to occur in the next five years, mainly due to the increase in 70 to 84-year-olds who are the highest users of health services.*
- *There is a need for disruptive innovation in healthcare to manage increasing demand and deliver more affordable and sustainable long term solutions. This includes more investment in technology-enabled "out-of-hospital" healthcare models.*

The IASB addition will contribute to responding to those demands by providing a place to integrate education, training and research with the delivery of care to provide improved public healthcare services in the region.

5.3 A Metropolis of Three Cities

A Metropolis of Three Cities - The Greater Sydney Region Plan (the Plan) sets out a vision of Sydney comprising of 'three cities' where most residents live within 30 minutes of their jobs, education and health facilities, services and the like.

The Plan identifies the Randwick Health and Education Precinct as one of Sydney's strategic collaboration centres, which this project embodies, consistent with *Action 10*. The delivery of the IASB addition would be consistent with actions in the Plan which promote the growth of complementary health and tertiary education activities in strategic centres and focuses on the expansion of health facilities to service Sydney's growing population.

5.4 Eastern City District Plan

The Eastern City District Plan provides a 20 year plan to manage growth and achieve the 40 year vision, while enhancing Greater Sydney's liveability, productivity and sustainability into the future. It has been developed by the Greater Sydney Commission (GSC) in collaboration with State agencies, the community and councils. It outlines management for economic, social and environmental growth in the Eastern City District. This includes the LGAs of Bayside, Burwood, Canada Bay, Inner West, Randwick, Strathfield, City of Sydney, Waverley and Woollahra.

The Eastern City District Plan identifies the Randwick Health and Education Precinct as a Collaboration Area. The collaboration of UNSW and the Randwick Hospitals Campus is a key planning priority of the Eastern City District Plan, which will provide an opportunity for education, research and health services to further integrate and support the community.

The Randwick Health and Education Precinct includes the following services:

- The private and public portions of the Prince of Wales Hospital
- The Royal Hospital for Women
- The Sydney Children's Hospital
- UNSW Kensington Campus
- The Black Dog Institute
- Neuroscience Research Australia
- The Bright Alliance.

5.5 NSW State Health Plan

The *NSW State Health Plan: Towards 2021* (State Health Plan) provides a strategic framework to unite existing plans, programs and policies regarding State-wide health services. It sets priorities across the health system for delivering an appropriate level of patient-centred care for all NSW residents. This includes creating an integrated health system by connecting primary and acute health settings. As a result, patient outcomes will be improved and unnecessary hospitalisations will be reduced.

The State Health Plan identifies four key strategies, including

- Supporting and developing our workforce
- Supporting and harnessing research and innovation
- Enabling eHealth
- Designing and building future-focused infrastructure.

The IASB addition supports each of the four key strategies of the State Health Plan as follows:

- Operation of the IASB will be a catalyst for creating new jobs and educating and training the future health workforce
- The IASB will overcome existing limitations on the ability to collocate translational medical research activities with core clinical services
- The partnering arrangements between NSW Health and UNSW for the IASB will provide a platform for education, training and research initiatives to be further integrated and expanded across the broader Randwick Health and Education Precinct.

5.6 SESLHD Journey to Excellence Strategy 2018-2021

The *SESLHD Journey to Excellence* (SESLHD Asset Plan) was developed by clinicians, service delivery partners and local communities within SESLHD. Key strategic priorities include:

- Safe, person-centred and integrated care

- Workforce wellbeing
- Better value
- Foster research and innovation.

Key enablers to achieve these priorities include:

- Partnerships that deliver
- Responsive information management systems
- Data and analytics
- Fit for purpose infrastructure
- A culture of continuous improvement.

6 Statutory Planning Context

6.1 Environmental Planning and Assessment Act 1979

Part 4, Division 4.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for SSD. Under Section 89D, the Minister is the consent authority for SSD. Section 78A (8) requires an EIS to accompany an SSD application in the form prescribed by the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

6.2 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 SRD SEPP 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 Project is for the purposes of "health, medical or related research facilities" that has an estimated CIV in excess of \$30 million, it is considered to be SSD.

6.3 State Environmental Planning Policy (Infrastructure) 2007

The *State Environmental Planning Policy (Infrastructure) 2007* (Infrastructure SEPP) assists the NSW Government in providing infrastructure, such as hospitals, roads, railways, emergency services, water supply and electricity delivery. It provides specific planning provisions and development controls for various types of infrastructure works or facilities.

The majority of the site for the IASB addition is currently zoned SP2 Health Services Facility with the balance zoned R2 Low Density Residential under Randwick Local Environmental Plan 2012. Division 10 of the Infrastructure SEPP deals with Health Services Facilities and at Clause 57(1) provides that *"...development for the purposes of health services facilities may be carried out by any person with consent on land in a prescribed zone"*. Clause 56 defines R2 Low Density Residential as a "Prescribed Zone". Therefore, the proposed development is permissible with consent under the Infrastructure SEPP.

6.4 Other State Planning Policies

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

- SRD SEPP as identified in this letter
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
- State Environmental Planning Policy No. 55 – Remediation of Land.

6.5 Randwick Local Environmental Plan 2012

The Randwick Local Environmental Plan 2012 (the LEP) establishes the zoning and development standards that apply to the IASB site.

6.5.1 Land Use Zoning and Permissibility

The proposal can be defined as a 'health services facility' under the LEP. This 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."*

For clarity a 'Hospital' is defined as *"a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, psychiatric care or care for people with disabilities, or counselling services provided by health care professionals) to people admitted as in-patients (whether or not out-patients are also cared for or treated there), and includes ancillary facilities for (or that consist of) any of the following:*

- a) day surgery, day procedures or health consulting rooms,*
- b) accommodation for nurses or other health care workers,*
- c) accommodation for persons receiving health care or for their visitors,*
- d) shops, kiosks, restaurants or cafes or take away food and drink premises,*
- e) patient transport facilities, including helipads, ambulance facilities and car parking,*
- f) educational purposes or any other health-related use,*
- g) research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes),*
- h) chapels,*
- i) hospices,*
- j) mortuaries.*

Note.

Hospitals are a type of health services facility—see the definition of that term in this Dictionary.

Development for the purpose of a "health services facility" within the R2 zone is a prohibited use under the LEP, however, as noted above its permissible under the Infrastructure SEPP. HI remains committed to developing a Planning Proposal to seek the rezoning of the lands from R2 Low Density Residential and R3 Medium Density Residential, respectively to SP2 Health and Education Facility, noting that this is not necessary for the proposed IASB addition.

The objective of the Planning Proposal will be to amend the Randwick LEP to reflect the appropriate statutory planning controls so as to facilitate the ongoing expansion of the Randwick Hospitals Campus

for the purpose of new health, research or education facilities to service the community and the future growth of the Precinct.

6.5.2 Height of Buildings and Floor Space Ratio

The existing Campus is zoned SP2 Health Services Facility and does not have a maximum building height or floor space ratio (FSR) controls. Land zoned R2 Low Density Residential has a maximum building height of 9.5m with setback of 30m along the Hospital Road boundary and maximum FSR of 0.5:1.

6.5.3 Design excellence and requirements for a Development Control Plan

Clauses 6.11 and 6.12 of the LEP respectively requires land over an area of 10,000m² to be subject to design excellence provisions and to prepare a site specific Development Control Plan for the land. The site area for this application is less than this threshold.

6.5.4 Infrastructure Development and use of Existing Buildings of the Crown

Clause 5.12 of the LEP provides that...

"(1) This Plan does not restrict or prohibit, or enable the restriction or prohibition of, the carrying out of any development, by or on behalf of a public authority, that is permitted to be carried out with or without development consent, or that is exempt development, under State Environmental Planning Policy (Infrastructure) 2007.

(2) This Plan does not restrict or prohibit, or enable the restriction or prohibition of, the use of existing buildings of the Crown by the Crown."

On that basis, the proposed development of the IASB addition is not subject to those restrictions.

6.5.5 Heritage

No heritage items or heritage conservation areas exist within the proposed IASB addition site. One heritage item listed under Schedule 5 of the LEP is located some 65m south of the proposal, identified as 'Cotswold' (Item No. I387). A Statement of Heritage Impact will be prepared as part of the SSD application. Aboriginal and Historical Archaeological Assessments will also be updated to include the additional areas of Hospital Road.

7 Preliminary Impact Identification and Risk Assessment

Based on preliminary site investigations and risk assessments, the potential key impacts associated with the IASB addition are summarised below and will be addressed in detail in the EIS.

7.1 Traffic and Parking

Development of the proposal involves the lowering and closure of Hospital Road to through-traffic. A Traffic Impact Assessment will be completed to reflect the new movements of the existing and approved developments, in and out of Hospital Road

As part of the collaboration agreement and the proposed integration of UNSW use into the IASB, parking for the users of the spaces will be accommodated on the UNSW Kensington Campus, noting that the staff are currently working out of the UNSW Campus.

Key issues to be addressed in the detailed traffic and parking assessment to be prepared for the IASB addition includes the following:

- New traffic movements from the removal of the left in / left out of Hospital Road from High Street, focusing on the staff car park access and the existing loading dock and the Hospital Road / Barker Street intersection
- Additional construction vehicles types, frequencies and routes
- Operational vehicle types, frequencies, routes and ingress/egress points in Barker Street and Hospital Road
- Access to residential properties during construction and operation
- Measurement of increase in traffic movements, type of traffic and assessment of degree of impacts from increased traffic
- Vehicle and pedestrian access connections with surrounding road network, land uses and public transport including UNSW and the new Light Rail.

7.2 Amenities

The EIS and accompanying specialist reports will include a detailed assessment of amenity issues including:

- Construction noise impacts such as use of plant and equipment, traffic and hours of operation
- Operational noise impacts from the additional uses and associated hours of operation
- Construction vibration impacts
- Construction air quality impacts
- Potential overshadowing impacts to residential properties on the southern side of Magill Street during operation
- Visual privacy to adjoining properties during construction and operation
- Pedestrian wind environment including any impacts from the helipad during operation
- Impacts from lighting during operation.

7.3 Structural and Civil

Preliminary design work has been undertaken in relation to structural and civil engineering, having regard to the existing site conditions and investigations. The approved On-site Stormwater Detention in the ASB project included capacity for future developments, which will be demonstrated in the SSD application. Overland flows and flood studies will be updated demonstrating that satisfactory mitigation measures to ensure the satisfactory control of stormwaters from the upstream catchment.

Structural and civil documentation along with a flooding statement will be submitted with the SSD application.

7.4 Air Space Intrusions

Sydney Airport is located 4km southwest of the IASB site. Height limits of buildings located within flight paths are governed by an Obstacle Limitation Surface (OLS) and the Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS). The OLS extends from RL 85m to 95m across the site whilst the PANS-OPS extends from RL 101m to 114m. The total proposed building height of the IASB is within the height of the approved ASB of RL 101.2m.

Applications for intrusions into the OLS by the building and for use of cranes during construction into the OLS and PANS-OPS will be submitted concurrently with the SSD application for approval by the Commonwealth Department of Infrastructure and Regional Development, if required. As in the ASB (SSD 9113) there is potential for some properties on the southern side of Magill Street to be subject to “weather vaning” from the proposed construction crane jib.

8 Consultation

In planning for the Randwick Campus Redevelopment, consultation with key stakeholders has been underway since 2016 and was broadened after the announcement was made in June 2017. Extending to a broad range of stakeholders have been engaged throughout planning including health consumers, patients and carers, immediate neighbours and community, clinicians and staff, utility providers, education providers, Randwick City Council, Civil Aviation Safety Authority, Emergency Services, and NSW Government agencies including Transport for New South Wales, Centre for Property Acquisition, Roads and Maritime Services, Ministry of Health and NSW Treasury.

Consultation for this IASB addition proposal has been undertaken with the Randwick Health and Education Precinct Partners and will be extended across all of the above stakeholders and other government agencies as the project progresses through the SSD application process.

9 Request for SEARs

On the basis that the Project falls within the criteria identified in Schedule 1 of the SRD SEPP, having an estimated CIV of \$55,000,000, HI formally requests that the Department of Planning and Environment issue the SEARs to facilitate the preparation of the EIS to accompany a SSD application for the Integrated Acute Services Building Addition for Prince of Wales Hospital, Randwick.

If you require any additional information, please contact Claire Muir on 9978 5402 or 0403 754 736. We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely,

A handwritten signature in black ink, appearing to read "G. Geraghty".

Gillian Geraghty

A/Executive Director, Northern Region

Attachment 1 – Schematic Drawings and Sections