

21 May 2013

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

Dear Mr Haddad

Northern Beaches Hospital - Request for Staged Director General's Environmental Assessment Requirements for the State Significant Infrastructure Application

In accordance with Section 115Y (1) of the *Environmental Planning and Assessment Act 1979* (EPA Act), Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), and Part 2 of Schedule 4 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), Health Infrastructure (HI) requests the issue of Director-General's Environmental Assessment Requirements (DGRs) for the staged development of the Northern Beaches Hospital. Approval for the development will be sought through a Staged Infrastructure Application in accordance with Section 115ZD of the EPA Act. The purpose of this letter is to provide a preliminary environmental assessment and other supporting documentation to allow for the DGRs to be issued.

This request follows formal gazettal of the Environmental Planning and Assessment Amendment (State Significant Infrastructure – Northern Beaches Hospital Precinct) Order 2012 on the 26th October 2012.

Background

Northern Beaches Health Service is one of three health services in the Northern Sydney Local Health District (LHD). The Frenchs Forest site for the new Northern Beaches Hospital was selected following extensive consideration, including traffic and travel studies, of sites that would be most accessible to the catchment population. This, more central location will enable the hospital to better service the Local Government Areas (LGAs) of Manly, Pittwater and Warringah, which form its catchment. Services such as maternity, critical care and acute mental health will be consolidated at the Frenchs Forest site and provide services to the broader catchment.

With extensive clinical networking across the LHD being progressed, each hospital will develop and refine roles in the LHD framework. This networking will reflect the provision of more complex tertiary and quaternary medical and surgical services at Royal North Shore Hospital. In order to perform its role, and its State wide role for services such as burns and spinal, it is important that clinical services at the Northern Beaches Hospital complement RNSH's role and avoid unnecessary patient flows for less complex care. Clinical networking across a range of medical and surgical specialties is integral to this service distribution.

The NSW State Plan, 'NSW 2021' identifies a need to "Renovate Infrastructure" as a way of achieving its goals for the State. Investment in critical infrastructure and providing world class clinical services with timely access and effective infrastructure are two key goals of the Plan.

The State Plan states:

"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."

Discussion papers prepared following community consultation identified key actions to be addressed by Regional Action Plans to support the State Plans goals. Local priorities identified for the Northern Beaches included a vision for the area and some key directions as well as specific actions. The following is an extract from the discussion paper based on community feedback:

The vision for the Northern Beaches is to protect its spectacular natural features and high quality lifestyle attributes that attract people to live in and visit the region. The region's centres will continue to grow, creating more local jobs and will be supported by integrated transport services and improved infrastructure.

More accessible

Transport to, from and across the region will be improved so that people spend less time in their cars commuting to work. This will include additional road capacity in current congestion hot spots, more jobs closer to where people live to reduce commute times, improved walking and cycling networks and greater public transport across the region.

More jobs closer to home

Strengthen and attract new economic activity and jobs to the region including an increase in tourism opportunities.

Better access to quality infrastructure

There will be better access to quality infrastructure and services locally, in particular healthcare services.

Protected natural environment

The region's ecological values and culturally significant places will continue to be enjoyed and protected

The Project

The Northern Beaches Hospital would allow more services to be delivered locally to residents of the Northern Beaches as population grows, and at a role delineation level higher than what is currently able to be supported by the existing hospitals at Manly and Mona Vale. This new facility is required to respond to the population catchment's health needs now and in the future. These health needs are considered and responded to through the integrated services of the LHD network of hospitals, including RNSH, Hornsby Ku-ring-gai Hospital, Ryde Hospital and the new Northern Beaches Hospital.

NSW Health, through the LHD and the Ministry, has considered planning to improve the health services on the Northern Beaches in detail since 2000. It has included extensive community consultation, analyses of demand trends and reviews of the physical facilities. All of these analyses have verified fundamental issues that compromise health care service delivery for the local population and if not resolved will continue to compound the existing problems of access, quality of care and service cost.

The primary objectives of the proposed development are to:

- Deliver the best quality integrated health services and clinical outcomes to the community of the Northern Beaches of Sydney and NSW Health;
- Integrate public and private health care into a single facility to maximise the range and breadth of services available to the community of the Northern Beaches of Sydney;
- Provide health care teaching, training, education and research within the Northern Beaches Hospital (NBH) as part of an integrated Northern Sydney Local Health District (NSLHD);
- Consolidate existing services at the Frenchs Forest location to create critical mass, thus improving accessibility to health services by creating the NBH; and
- Address the demand and cost impact of current and future health services now and into the future by enabling a sustainable health system by changing the patterns of supply and demand. This will be achieved by utilising the location of the NBH, its operational and design innovation and digital hospital technologies.

The proposed hospital site has an area of approximately 6.5ha. The hospital development will deliver around 70,000m² of hospital floor space including acute and sub-acute facilities, emergency medicine and imaging along with ancillary uses such as retail and car parking.

The Delivery Imperative

Government has provided a commitment to commence work at the Frenchs Forest site by the first quarter 2014. The NSW Health Capital Program has allocated funding in the Capital Investment Strategic Planning (CISP) for the Northern Beaches Health Service development. In order to meet this time frame the project will be undertaken in two stages via a Staged Infrastructure Application.

Stage 1:

The first stage will involve biodiversity management, site clearance and preparatory works for the new hospital and approval will therefore be sought to achieve a “concept” approval for the overall hospital and for the stage 1 works mentioned above.

Stage 2:

The second stage will be the construction of a new hospital building and may include:

- Bulk Excavation works including a sub-level car parking structure;
- Emergency, critical care, operating theatres, acute inpatient (overnight, day, and extended day only), maternity and neonatal, paediatrics and adolescents, mental health and drug and alcohol, sub-acute services, primary health care services, ambulatory services, clinical support services, other support services, and associated administrative and front of house services;
- Building mass of six to ten storeys (excluding plant level) including lower ground floor, ground floor, and level 1. The building will have a massing of two storeys on approach and entrance, and three storeys at the rear of the facility;
- Approximate gross floor area of 70,000 square metres (subject to refinement during the ongoing planning process);
- Any additional car parking for staff, patients and visitors;
- External site works such as landscaping, pathways etc.; and
- Utility services amplification works.

Preliminary concept plans of the proposed development are included in Attachment 1.

Site Context and Location

The Northern Beaches Hospital will be located at the junction of two of the major arteries of the North East Subregion, Warringah Road and the Wakehurst Parkway and is located approximately in the middle of the geographical catchment. Surrounding development includes residential, business park and education uses. Figure 1 shows the site locality map for the new Northern Beaches Hospital site.



Figure 1 – Site Locality Plan

Topography

A full suite of site topography surveys and supporting underground services surveys have been undertaken for the site and surrounding areas. This information has been used to inform the preliminary design stages of the project including the enabling works for the first phase.

The site generally falls west to east with a ridge line moving across the site from NW to SE. Based on a review of the preliminary desktop geotechnical assessment by Coffey Geotechnics (March 2011), the profile typically comprises fill and clay over weathered shale and sandstone. The Northern Beaches Hospital project team has undertaken a partial geotechnical study of the site via borehole drilling to confirm these initial findings with the geotechnical report and information provided to the consultant team to inform masterplanning and input into the Concept Design Report. When the topography of the site is enabled through the second stage building platform works the development site lends itself well to utilisation large footprint, campus-style buildings such as those associated with health uses.

Vegetation –

The site contains Duffy's Forest Endangered Ecological Community (DFFEC) as defined under Schedule 1 to the *Threatened Species Conservation Act 1995*.

Detailed flora and fauna assessments have been undertaken by SMEC Australia (SMEC) to support the environmental assessment. The site contains areas of varying quality of DFEEC. Vegetation around the perimeter of the site is considered to be of low quality with mixed canopy species and weed encroachment. There is good quality vegetation between the lots on Bantry Bay Road and Wakehurst Parkway in the area known as Blinking Light Reserve (formerly managed by Warringah Council) and in the road reserve. The project is currently planning to retain and manage this component of DFEEC.

Three seasonal biodiversity surveys have been completed for the project, Winter (July 2012), Spring (October 2012) and Summer (February 2013).

Health Infrastructure and its consultants met with the Office of Environment and Heritage (OEH) and incorporated advice on survey methodology for threatened species for the Spring and Summer surveys. Targeted threatened flora species surveys were also undertaken upon advice from OEH.

Ongoing discussions are occurring with OEH in regards to BioBanking and Offset strategies for the site ensuring the BioBanking Assessment Methodology is applied appropriately.

Bushfire

Warringah Council Bushfire Prone Land mapping indicates the site is categorised as Bush Fire Prone Land Vegetation Category 1 which indicates a high hazard. A detailed bushfire assessment in accordance with the NSW Rural Fire Service “Planning for Bushfire Protection” has been completed against this classification (April 2011). A number of site maintenance activities have been undertaken to minimise bushfire threat to the site and surrounding areas for the upcoming season. This work has been assessed under the provisions of State Environmental Planning Policy (Infrastructure) 2007 and Part 5 of the EP&A Act.

Based on this initial bushfire assessment, the subject land is capable of accommodating the proposed Northern Beaches Hospital provided that the development is designed with consideration of Asset Protection Zones along any boundaries within 100m of bushland, Bushfire Attack Levels for construction of the hospital buildings where required, appropriate road design, installation of water and other services and effective emergency management planning. These issues will be considered in the detailed design of the building and site and will be addressed in the relevant EIS.

As part of NSW Health’s obligations under the ***Rural Fires Act 1997***, bushfire hazard reduction works have recently been completed to reduce the bulk fuel content of the site.

Contamination

Geotechnical and geochemical contamination assessments were undertaken in mid-2012 and full reports will be submitted with the relevant EIS. Groundwater monitoring for quality and flow is ongoing through to mid-2014 to provide a comprehensive data set to inform the EIS submission.

Strategic Planning

NSW State Plan 2021

The NSW State Plan – NSW 2021 contains 32 Goals for the State. In terms of health services the key goals are:

- Keep People healthy and out of hospital.
- Provide world class clinical services with timely access and effective infrastructure.
- Invest in critical infrastructure.

This project comprehensively meets these goals.

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. Recommendation 57 of the report states “***Construct Northern Beaches Healthcare Precinct, public and private facilities co-located.***”

The report indicates that NSW’s health system faces growing demand from an ageing population, lifestyle diseases and new care technologies. This will require new models of care, including more beds in smaller, specialist medical facilities and repurposing community health centre. The Northern Beaches Hospital should be delivered as a “health care precinct” combining both public and private service provision in an integrated fashion.

The recommended strategy for better leveraging capital investment at current and new facilities, is to establish centres of excellence in pro-actively planned “health care precincts” with clusters of related health services delivered by Government and non-government providers. This derives benefits from both agglomeration and specialisation, and complements the existing network of large general hospitals.

Metropolitan Plan for Sydney 2036 and Sydney North East Subregional Strategy

Frenchs Forest was identified as a “Potential Specialised Centre” in the Metropolitan Plan for Sydney 2036 (Metro Plan). Its declaration as a Potential Specialised Centre is based on it being able to combine a large employment area with potential hospital and health related uses.

The Metro Plan identifies the Future Directions for the centre as:

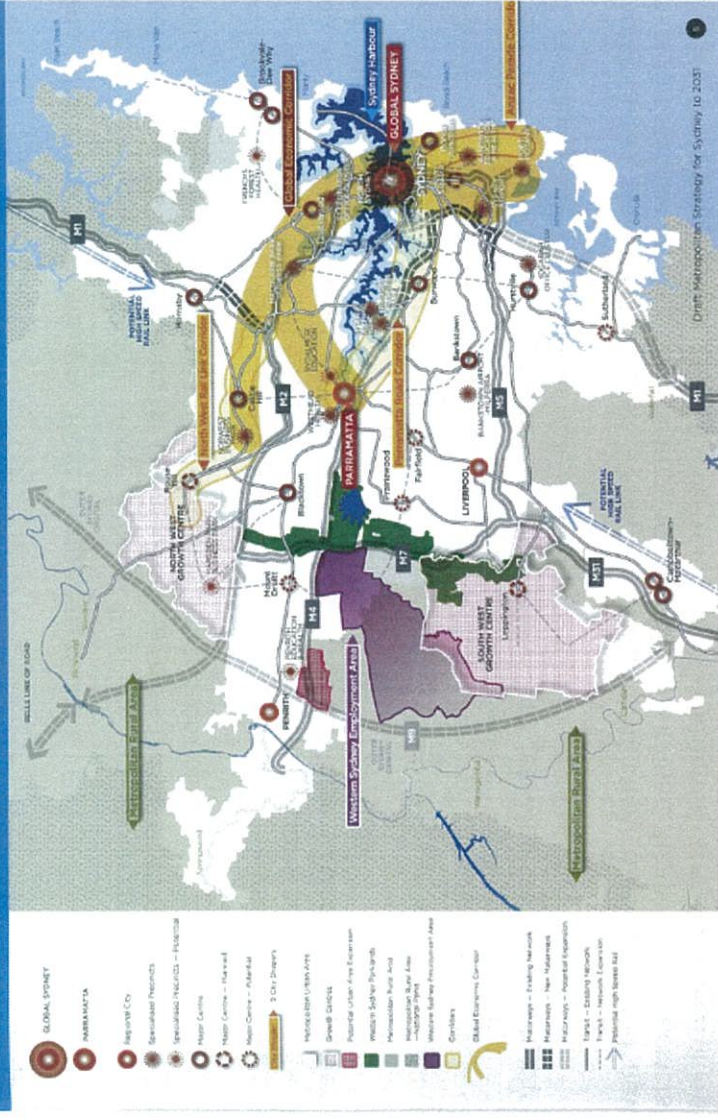
- Focus concentration of office-based employment.
- Support medical enterprise clustering in the potential hospital precinct.
- Investigate potential for associated retail and residential uses subject to detailed strategic planning and urban design investigations.
- Investigate public transport improvements, including bus priority improvements on Warringah Road.
- Investigate improvements to key road intersections.

The Plan also cites examples of State Government support, including the potential location for new Northern Beaches Hospital.

Draft Metropolitan Strategy for Sydney to 2031

The Draft Metropolitan Strategy for Sydney to 2031 (Draft Metro Strategy) also identifies the Frenchs Forest site as a Potential Specialised Precinct and identifies its future development as contributing to balanced growth in Sydney.

Figure 1: Vision for Sydney in 2037



The Draft Metro Strategy identifies one of the priorities for the North Subregion to “capitalise on the growing cluster of hospital and health related uses and associated research/business park opportunities to stimulate local jobs”.

Legislation

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

The provisions of the Commonwealth EPBC Act come into effect where the proposed works is development that takes place on or affects Commonwealth land or waters or where the development is carried out by Commonwealth agencies. In addition, where the development is a matter considered to be of National environmental significance; the provisions of the Act come into force. At this stage we have not identified any critical habitats or nationally listed threatened species occurring on the site.

Rural Fires Act 1997

The requirement to obtain a Bushfire Safety Authority under s100B of the *Rural Fires Act 1997* is triggered by works that involve the subdivision of land or a special fire protection purpose. As the project is State Significant Infrastructure (SSI), this approval will not be required.

Threatened Species Conservation Act 1995

The proposed works would involve removal of vegetation, part of which comprises Duffy's Forest Endangered Ecological Community. The landscape of the subject site has been heavily modified. Comprehensive surveys undertaken during 2012/2013 have not identified any threatened species on the site.

Contaminated Land Management Act 1997

The subject land is not subject to any declarations, orders, or voluntary management proposals, as defined in the Act. Investigations on the status of the site in respect to the *Contaminated Land Management Act 1997* have now been completed with nil contamination results determined.

Heritage Act 1977

A European Heritage assessment has been completed and will be included in the EIS. Results indicated no heritage issues on site.

National Parks and Wildlife Act 1974

An Aboriginal Heritage assessment has been completed and will be included in the EIS. Results indicated no heritage issues on site.

Roads Act 1993

The proposed works may involve the widening of a road and creating access from a potentially classified road and may require a Roads Act approval.

Statutory Planning

State Environmental Planning Policies

The following table identifies the State Environmental Planning Policies (SEPPs) that apply or potentially apply to the land or type of development that is subject to this proposal, and the proposal's compliance with those Policies.

SEPP #	Name	Applies	Compliant
1	Development standards	✓	✓
33	Hazardous and offensive development	NK*	
55	Remediation of land	✓	✓
	Infrastructure 2007	✓	✓
	State and Regional Development	✓	✓

* Not known at this stage

Local Environmental Plans

Warringah Local Environmental Plan 2011

The site is currently zoned R2 Low Density Residential Zone to the west of Bantary Bay Road and RE1 Public Recreation to the east of Bantary Bay Road and bordering Warringah Road to the west. Hospitals are permissible with consent within the R2 Zone.

Consultation Undertaken

Due to the location and scale of the project a detailed consultation strategy has been developed to ensure that information about the project is provided.

Health Infrastructure is continuing to participate in an Interdepartmental Group and Interface Reference Group with agencies including the Department of Planning and Infrastructure; Roads and Maritime Services, Office of Environment and Heritage and Transport NSW to coordinate the delivery of the relevant necessary infrastructure.

In addition, the following “internal” consultation has occurred to date with staff and clinicians from the Northern Beaches and North Sydney Local Health District (NSLHD):-

- Two Strategic Functional Briefing Workshops were held on the 23/5 – 24/5/12 and 12/6 – 13/6/12;
- Project Development Committee (PDC) have been briefed and consulted in regards to service delivery models and master planning;
- Key decisions around service delivery models have been sought through both the PDC and NSLHD;
- Individual discipline meetings have occurred with a number of staff in regards to Northern Beaches Hospital, Mona Vale and Community Health Services;
- An Executive User Group has been established to address data activity analysis for briefing for Market Sounding;
- Referral Notes prepared for NSLHD Board meetings;
- Communications Working Group established for project;
- Value Management Workshop held with key stakeholders on the 5th December 2012;
- Presentation to Clinical Council delivered on 25/10/12 in relation to project update and Market Sounding exercise;
- Clinical Reference Group established and meeting monthly to discuss clinical planning issues; and
- A Strategic Communications and Engagement Plan has also been developed.

A comprehensive Communication and Engagement Plan has been developed to guide ongoing communication with stakeholders. This includes:

- Northern Beaches Newsletter distributed in March 2013;
- Northern Beaches Website which will be available in early May 2013;
- Cascade briefings to NBHS staff;
- Opening of Northern Beaches Project Office in December 2012 to facilitate consultation; and
- On-going Functional Briefing with clinical and service User Groups.

Capital Investment Value

The Capital Investment Value of a project is defined in the Environmental Planning and Assessment Regulation 2000 as follows:

“capital investment value of a development or project includes all costs necessary to establish and operate the project, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment, other than the following costs”:

- (a) amounts payable, or the cost of land dedicated or any other benefit provided, under a condition imposed under Division 6 or 6A of Part 4 of the Act or a planning agreement under that Division,
- (b) costs relating to any part of the development or project that is the subject of a separate development consent or project approval,
- (c) land costs (including any costs of marketing and selling land),
- (d) GST (within the meaning of A New Tax System (Goods and Services Tax) Act 1999 of the Commonwealth).

Based on that definition, the CIV of the Northern Beaches Hospital is approximately \$400 million in total.

Request for Director General's Requirements

On the basis that the proposal listed in Part 2 of Schedule 4 of the State and Regional Development SEPP and has a Capital Investment Value in excess of \$30 million, Health Infrastructure formally request that the Department of Planning and Infrastructure issue the DGRs for a State Significant Infrastructure Application in accordance with section 115ZD of the EP&A Act as outlined above to facilitate the preparation of the Environmental Impact Statements to accompany the infrastructure applications for the proposal.

If you require any additional information please contact Leoné McEntee on 9978 5420 or 0410 432 505. We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely



Sam Sangster
Chief Executive

ATTACHMENT 1: CONCEPT PLANS