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7 July 2008

The Honourable Frank Sartor MP
The Minister for Planning
c/o Department of Planning
Level 1, 23-33 Bridge Street
SYDNEY NSW 2000

Attn: Mr Michael File

Application for Approval of Project Under Part 3a
Kareena Private Hospital – 86 Kareena Road, Caringbah

Dear Minister

This submission has been prepared by HASSELL Ltd on behalf of Ramsay Health Care, the proponent of a proposed extension and refurbishment of the existing Kareena Private Hospital and associated car parking, landscaping and site works at 86 Kareena Road, Caringbah.

The purpose of this submission is to request that the Minister:

- Form the opinion under Schedule 1, Part 18 of the Major Projects SEPP 2005 that the proposed extension and refurbishment work at Kareena Hospital constitute a “major project” to which Part 3A of the Environmental Planning and Assessment Act 1979 applies; and
- Authorise the proponent to submit a concept plan for the proposal, which includes the staged implementation of the project.

With a capital investment value of approximately \$24.7 million, the proposed development satisfies the criteria established in Schedule 1 of the Major Projects SEPP.

If the Minister agrees to the above, it is requested that: the Director-General of the Department of Planning issues the requirements for the preparation of an Environmental Assessment Report to accompany the concept plan for the proposed development and a concurrent project application for the first stage of the proposal being the alterations to and expansion of the hospital as per the attached plans and details.

INTRODUCTION

Kareena Private Hospital was established in Sutherland Shire over 42 years ago, and since that time has provided high quality health care services for residents with a catchment well beyond the immediate Sutherland Shire. The Hospital facility has now reached the stage where it needs to develop and expand its medical services, to ensure a greater level and higher standard of service to the community in the future, to replace ageing building stock and enable the continuance of the critical facilities currently provided by the hospital.

The hospital offers a comprehensive range of medical, surgical and maternity services. Additionally, it operates one of only three (3) private Emergency Department services in NSW. The Hospital is within a region that contains limited health services, with the proposed expansion intended to ensure both the long term viability of these services, but also to introduce specialist services not currently provided in the region.

Currently, Kareena Private Hospital is a 109 inpatient bed facility with 19 additional day surgery recovery beds, offering the following specialities:

- Maternity and Obstetric care (including Level II Special Care Nursery)
- Orthopaedics
- Acute Medical and Surgical services (including Urology, General, Gynaecology, Ear Nose & Throat and Vascular surgery)
- Angiography and Cardiac Catheter unit
- Rehabilitation services (both medical and musculoskeletal)
- Day Surgery Unit
- Emergency Care
- Diagnostic and ancillary services

Kareena Hospital has a well-deserved reputation in the provision of medical care; however, its services are now being compromised by outdated building stock and plant that is nearing the end of its useful life. As a result, key facilities within the hospital need to be expanded, as they are now insufficient to meet the standards expected and demanded.

Strategically, the hospital is located directly opposite the Sutherland Public Hospital on the Kingsway, Caringbah. This nexus is important for the medical services on offer to the region as facilities and services are complementary between the two hospitals, examples are illustrated below:

- It is the case that Medical Specialists working in Sutherland Public Hospital, also work in Kareena Private Hospital, and are able to simply cross the road to visit and treat respective patients.
- In 2005, Kareena Hospital introduced a new service "Interventional Cardiology" with the commissioning of a Cardiac Catheter Laboratory on site. This service was in response to community need and is the first such laboratory in the Sutherland Shire.
- Kareena Private Hospital provides a full service Emergency Department, accepting on average 15 presentations including ambulances a day, providing significant relief to the Emergency Department at Sutherland Public Hospital.
- Doctors/surgeons in training at Sutherland Public Hospital are able to gain additional experience through being appointed as surgical assistants in operating theatres in Kareena Private Hospital.

Medical specialists are located near to both hospitals, providing services to both hospitals.

This strategic relationship is identified and confirmed in the following key documents:

- Sutherland Shire Local Environmental Plan 2006 which identifies the lands zoned for Special Uses (Medical Facility), and adjacent sites as Zone 4 – Local Housing (Medical Facilities);
- Sutherland Shire Development Control Plan 2006 as a “Medical Cluster Precinct” with the Locality Statement identifying the opportunity of Sutherland and Kareena Private Hospitals *"to make an area of Caringbah a leading centre for a raft of medical-related facilities"*.
- The NSW Government's South Subregion Draft Subregional Strategy (2007) states that a 'Key Direction' of the strategy is to investigate and resolve the roles of Caringbah, Miranda and Sutherland seeking to promote of Caringbah and Miranda as 'centres of excellence' in biomedical and bioengineering research and development. The medical cluster is recognised in the Draft Subregional Strategy as a 'significant feature' of the shire.

1.1 Site Description

The subject site is located on the corner of Kareena Road North and Kingsway, Caringbah. The site has an approximate area of 9,600 square metres and slopes away from the Kingsway frontage, with a fall of over 2 metres. The site has been benched below the level of the Kingsway by approximately 1 to 3 metres.

The legal description of the site is set out in the table below:

Description	Existing Zone (SSLEP)
Lot 1 DP 203024	Zone 12 – Medical Facility
Lot 2 DP 203024	Zone 12 – Medical Facility
Lot 3 DP 650201	Zone 12 – Medical Facility
Lot Y DP 417162	Zone 12 – Medical Facility
Part Lot 2 DP 20431	Zone 12 – Medical Facility
Part Lot 4 DP 20431	Zone 12 – Medical Facility
Lot 101 DP 814378	Zone 12 – Medical Facility
Lot 102 DP 814378	Zone 12 – Medical Facility
Lot 6 DP 20431	Zone 12 – Medical Facility
Lot 26 DP 21004 (439 Kingsway)	Zone 4 – Local Housing

1.2 Planning History

The project has undergone an extensive process of liaison and negotiation with Sutherland Shire Council, its independent Architectural Review Advisory Panel, and importantly, the local community. It is important to note that Ramsay Health chose to pursue a development application to the local authority under Part 4 of the *Environmental Planning and Assessment Act 1979* in the attempt to foster an early relationship for future and ongoing development at the site.

Ramsay Health Care in association with HASSELL, presented Sutherland Shire Council's Architectural Review Advisory Panel with a proposed scheme to upgrade and extend Kareena Private Hospital on three separate occasions (13 December 2006, 31 May 2007 and 6 November 2007). A precis of the liaison undertaken on the project is provided below:

1.2.1 Architectural Review Advisory Panel – 13 December 2006

The Panel raised the following issues/recommendations in relation to the scheme:

- Appropriately incorporating the 'corner' element into the proposed additions;
- Plant material should be well screened and setback;
- Give emphasis to the design of the building entrance;
- Proposed additions should be integrated with the existing building; and
- Provide landscaping along the Kingsway.

1.2.2 *Pre-DA – 24 January 2007*

A Pre-Development Application meeting between Council's planning staff, Ramsay Health and HASSELL was held to discuss the proposed scheme. This meeting was held on the 24 January 2007, with Council highlighting the following issues in relation to the proposed scheme for detailed investigation:

- Zoning;
- Car parking;
- Social Impact;
- Arborist report; and
- Height and appearance to the Kingsway.

The application considered these items in the progression of the application:

1.2.3 *Community Consultation – 3 April 2007*

Prior to lodging the DA and in addition to the public notification period, Ramsay Health in association with HASSELL consulted with adjoining landowners and other key stakeholders via an information evening held at Kareena Hospital on 3 April 2007. Aware of the concern of the immediate residents in the area of the impacts on parking and traffic as a result of the 'Medical Cluster', Ramsay Health Care chose to present the draft scheme for comment to those residents in an open forum.

The project planners and architects, in addition to specialist traffic consultants, presented to the community both the draft scheme and the overall master plan for the site.

The names and contact details of the attendees were taken, with a view to continuing the open communication Ramsay Health had sought in relation to the development application.

The information evening provided attendees with an introduction to the hospital, why the master plan has been developed, a presentation on future plans for hospital including the role the hospital plays in the local community, as well as providing an opportunity for landowners to give feedback on the proposed DA scheme.

1.2.4 *Architectural Review Advisory Panel – 31 May 2007*

The DA was discussed at a second Architectural Review Advisory Panel meeting on 31 May 2007. The panel raised the following issues in relation to the proposed DA scheme:

- Proposal should express an urban character;
- Residential amenity should be retained;
- Landscaping is required; and
- Eastern side building setback.

1.2.5 *Council Correspondence – 31 July 2007*

Following an initial assessment undertaken by Sutherland Shire Council planning staff, the applicant was advised via correspondence dated 31 July 2007, that Sutherland Shire Council was not willing to support the development application based on concerns relating to:

- Height and Built Form;

- Car Parking and Loading; and
- Comments from Sutherland Shire Council's Architectural Review Panel.

Sutherland Shire Council at this stage provided the applicant with an opportunity to withdraw the DA, otherwise it would be refused under delegation within fourteen (14) days.

In response to this advice, the applicant arranged to meet with the relevant Sutherland Shire Council officers on 16 August 2007 to discuss the possibility of providing Sutherland Shire Council with an amended scheme that addressed their concerns.

It was agreed by Sutherland Shire Council, in their letter dated 22 August, that the applicant would not be required to withdraw the application on the basis that the scheme could be suitably amended having regard to the concept plans tabled during the meeting.

1.2.6 Amended Scheme – October 2007

An addendum to the DA was lodged with Council in October 2007. The amended scheme essentially proposed to reduce the overall bulk and scale of the original scheme through:

- Removal of administrative space;
- Removal of the proposed eastern wing and northern ward extension of the proposed development;
- Reconfiguration of internal areas;
- Removal of one level in height on the main building; and
- Reallocation of all car parking at-grade.

On behalf of Ramsay Health Care, following lodgement of the DA addendum, HASSELL regularly contacted Council's assessment officer to gain information on the applications status and whether any further information would be required for assessment purposes. During these regular discussions, Council's assessment officer did not request any further information or indicate that the DA could potentially be recommended for refusal.

1.2.7 DA Refusal – 6 November 2007

Sutherland Council refused the DA on 6 November 2007 under delegated authority. This determination was not discussed with the applicant prior to this decision being made, despite the ongoing effort made by the applicant to consult with Council and the community and subsequently appease any issues put forth by either group.

2.0 OVERVIEW OF THE PROPOSAL

In response to changes in market conditions and the strategic long term vision for the site, the proponent has expanded and altered the proposed scope of works from that considered by Sutherland Shire Council in 2007. The scheme now proposed is different to that refused by Council and now involves non-complying use of residential land, increased building height and floor space, altered vehicular and pedestrian access arrangements. The proposed scheme is considered to fit the definition of a Part 3A project being extension of a hospital with a cost of works exceeding \$15 million.

The proponent is seeking to submit a Concept Plan to establish up front justification for the proposed uses and layout of the overall redevelopment on the site, including the use of the adjacent Lot 26 of DP 21004 (No. 439 Kingsway, Carlingbah) which is approximately 687m² in area and zoned, Zone 4 Local Housing. While there is some scope to allow for medical facilities within Zone 4 Local Housing, it is restricted to Residential Medical Facilities and therefore not conducive to the expansion of an established medical facility.

The Concept Plan will establish the environmental parameters for the expansion of the private hospital and seek approval for the general location/ height and massing of the redevelopment within the site.

Concurrently, the proponent will seek Project Application approval for works to expand the private hospital and create an area of additional parking as the first stage of the overall development. The Project Application will address the detailed design of the additions to the private hospital and be consistent with the concept plan for the site.

Key elements of the proposal include:

- Provide an additional 67 beds to lower ground, ground and first floors to meet increases in bed demand over an additional 3,000 square metres of additional hospital floor space and to reconfiguration of internal spaces to create more single bedrooms and a "hot floor" for critical care treatment aligned with the theatre suite. This reconfiguration will align the facility with recognised best practice in health care buildings;
- Upgraded rehabilitation department at lower ground floor to accommodate an expanded rehabilitation programme including day programs, supported by a gymnasium and hydrotherapy pool facility;
- Provision of on site parking for a total of 127 cars at lower ground floor, including secure car parking for staff on the adjacent site in the ownership of Ramsay Health Care (439 Kingsway);
- Reduction of car parking spaces proximate existing loading dock at lower ground floor to allow better circulation of traffic and loading areas;
- Retention of the existing site access (out only) at lower ground floor level to Kareena Road North from 439 Kingsway. For the avoidance of doubt, this item is not critical to the expansion of the hospital and has been tabled with the RTA and will be subject to ongoing negotiation;
- Extension of the theatre suite at ground floor to provide larger operating and recovery theatres and a larger central sterilising department to cater for increasing complexities in surgery techniques and instrumentation. The recovery unit will also be increased to comply with health building guideline requirements for area and services;
- Update and extend the exterior building elements to revitalise the building's identity commensurate with the standard of medical care Kareena Private has to offer;
- Update and extend plant to provide air-conditioning that complies with current and future regulatory requirements of air quality and energy sustainability and relocation to south western part of building;

- Provision of 400 square metres of additional administrative floorspace at second floor; and
- The introduction of associated landscaping.

The revitalisation of the interior environments are sought in order to match client expectations of a private health facility and importantly to help attract and retain the best medical staff for the region.

Preliminary drawings are attached at Appendix 1.

The proposal seeks a Staged Application as discussed, with the staging outlined in the following sections.

2.1 Staging

2.1.1 Stage 1

The first stage of works will comprise of the following:

Lower Ground Level

- Works are proposed to enhance and enlarge the existing loading dock arrangements (southwest corner) through the removal of car parking spaces adjoining the approach to the loading dock (increasing circulation space for delivery vehicles).
- Demolition of existing improvements to Lot 26 of DP 21004 (No. 439 Kingsway, Caringbah) and the site be redeveloped to accommodate parking associated with the Hospital off-setting the loss of car parking spaces required to enhance access to the lower ground loading.
- New hydrotherapy pool and rehabilitation suite to accommodate an expanded rehabilitation programme including day programs. Insertion of new lift and fire stairs, create additional pedestrian entrance ways into the Hospital from the southern car parking area.
- Associated landscaping and parking.

Ground Level

- At ground level it is proposed to carry out alterations and additions to the existing building (including the insertion of new lift and fire stairs) to create an additional ward accommodating 37 beds (southern elevation). Extension of the building (eastern elevation) is also proposed to create space for two new operating theatres, sterilising facilities and recovery facilities. In total, 1,563sqm of additional space is proposed at Ground Level.

2.1.2 Stage 2

Works proposed in Stage 2 are limited to Level 1, where works are proposed to the southern elevation to extend the Hospital (including the insertion of new lift and fire stairs) to create a new ward containing 37 beds. In total 1,435sqm of additional space is proposed at Level 1 in Stage 2.

2.1.3 Stage 3

In Stage 3, at the lower ground level (northern elevation) expansion of the hospital is proposed to create 8 single room beds to replace 8 existing beds and provide additional storage areas.

Extension to northern part of the building will be into an existing courtyard however access will still be provided to an open space area at this frontage. Detailed design of the various other components of the development will be addressed in future Project Applications within the overall Concept Plan framework.

Level 2

In Stage 3, at Level 2, it is proposed to undertake works to create additional office/administrative space (southern elevation), and to relocate existing plant to the western side of the building. The new office space would occupy 400sqm of area. Access to this level would be provided via a new lift and fire stair.

3.0 APPLICATION OF PART 3a

Schedule 1 of the Major Projects SEPP sets out the classes of development that qualify as Major Projects, specifically Group 7 'Health and public service facilities', with Part 18 'Hospitals' specifying the following:

- (1) *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 inpatients (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.*

The proposed expansion and redevelopment of the Kareena Private Hospital is consistent with the above criteria with regard to the services it will provide. The private hospital component of the proposal will have a capital investment value of approximately \$24.7 million and therefore meets the SEPP criteria as a major project. A report prepared by an appropriately qualified quantity surveyor setting out the project cost accompanies this letter, and is attached in Appendix 2.

3.1 Justification for Part 3a Process

Section 75b of the *Environmental Planning and Assessment Act 1979* refers to Projects to which Part applies (that is, Part 3a).

75B Projects to which Part applies

(1) General - This Part applies to the carrying out of development that is declared under this section to be a project to which this Part applies:

- (a) by a State environmental planning policy.*

Key differences between the earlier scheme considered by Sutherland Council and the current proposal; are set out below:

- Altered loading and unloading and car parking arrangements;
- Expansion of building envelope to accommodate additional hospital beds across three levels;
- Additional office/administration area at a new 4th level; and
- Alterations and additions to building envelope to expanded operating theatre space.

The applicant is seeking approval through the Major Applications process for a number of reasons, namely:

- The proposed scheme is different to that refused by Council and is considered to fit the definition of a Part 3A project being extension of a hospital with a cost of works exceeding \$15 million.
- The scheme involves non-complying use of residential land.
- Council's controls, while recognising that the site is in a medical specialist hub, do not allow for development over 2 storeys and therefore restrict development of this hub. Additionally, Council is constrained in long term regional strategic considerations on the site due to community concerns and therefore is having difficulty considering the wider implications on health facilities and infrastructure servicing the region.
- The scheme offers significant strategic benefit. It also proposes building heights above the Council's residential development standards.
- The Major Projects SEPP and Part 3A were introduced in part to ensure strategic consideration could be given an appropriate weight in situations such as that which exists at Kareena Private Hospital. It is considered that this proposal sits comfortably with State policy directions.

4.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

The information below has been prepared to assist the Director-General in identifying the general requirements and key environmental issues to be addressed in the Environmental Assessment Report that will accompany the Concept Plan application. The key environmental considerations associated with the proposed Concept Plan for the health cluster are considered below.

4.1 Suitability of the Site

The subject site is situated close to a cluster of medical facilities and bounded by low density residential uses to the north and east. The NSW Government's Draft South Subregional Plan recognises the advantages that accrue through the clustering of health facilities in the vicinity of the site. This is also recognised within the SSDCP 2006 which notes that:

"Sutherland Hospital and Kareena Private Hospital offer considerable opportunities to make an area of Caringbah a leading centre for a raft of medical-related facilities. The concentration of these facilities into one area will limit the number of trips required to seek specialist medical advice and develop into an area of medical excellence. It will enable the Caringbah Centre to feed off additional patronage that would otherwise be dispersed to other areas. Its reliance on a major public transport node can also be taken advantage of. The medical cluster caters for the people of the Shire and provides specialist medical services to a wider catchment. An area adjoining Sutherland Hospital has been identified as an essential area for this purpose."

The statement above establishes the frame of reference for medical related activities in the vicinity of the Sutherland Hospital. It is desirable that medical-related development be integrated with the existing urban fabric, whilst still achieving the 'green' principles of service and infrastructure agglomeration. The redevelopment of the Kareena Hospital will contribute to the area becoming a centre of medical excellence.

The subject site is designated within the SSLEP as falling within two zones: Zone 12 - Special Uses (which applies to the vast majority of the site), and Zone 4 Local Housing (applying to Lot 26 DP 21004). The proposed expansion of Kareena Private Hospital would be permissible with consent within Zone 12 - Special Uses (Medical Facility).

The use of Lot 26 DP 21004 (designated as Zone 4 Local Housing) for the provision of health care is prohibited under the SSLEP. Under Section 75J (3) of the Act, the Minister is able to approve the carrying out of a project that is part permissible.

The redevelopment addresses and improves the identity and future capability of Kareena Private Hospital. The redevelopment recognises the important contribution the facility makes to further the health benefits of Sutherland Shire occupants. The Council has identified this site as part of its strategic direction for the creation of a medical hub, and as such, the context and setting for the proposed redevelopment of the Kareena Hospital is consistent with long term strategy.

4.2 Need

The Sutherland Shire Community Plan 2006-2010 identifies that there is demographic change underway within the Shires community. Most significantly, the Plan identifies that 40% of the Shires population will be over 55 years of age within 20 years. The implications of an ageing population will therefore be most significant on the services that elderly people use the most; a primary service being health care.

This demographic trend will result in future demand for additional health care facilities and therefore the need to expand the existing hospital campus. Ramsay Health Care can demonstrate evidence of significant demand for additional medical services and related uses which would accommodate accommodation within an expanded Kareena Private Hospital.

In addition, the Kareena Private Hospital does not currently provide services in other specialty areas including day oncology, renal dialysis or day rehabilitation due to a lack of space on site. Ramsay Health Care can demonstrate a significant demand for these services from both its patients and prospective patients. Ramsay Health Care has identified that national projections for the demand for these services is that it shall grow dramatically in the next 10 years.

Therefore there is significant need and demand for additional medical accommodation to provide specialist services at Kareena Private Hospital.

4.3 Social and Economic Benefits

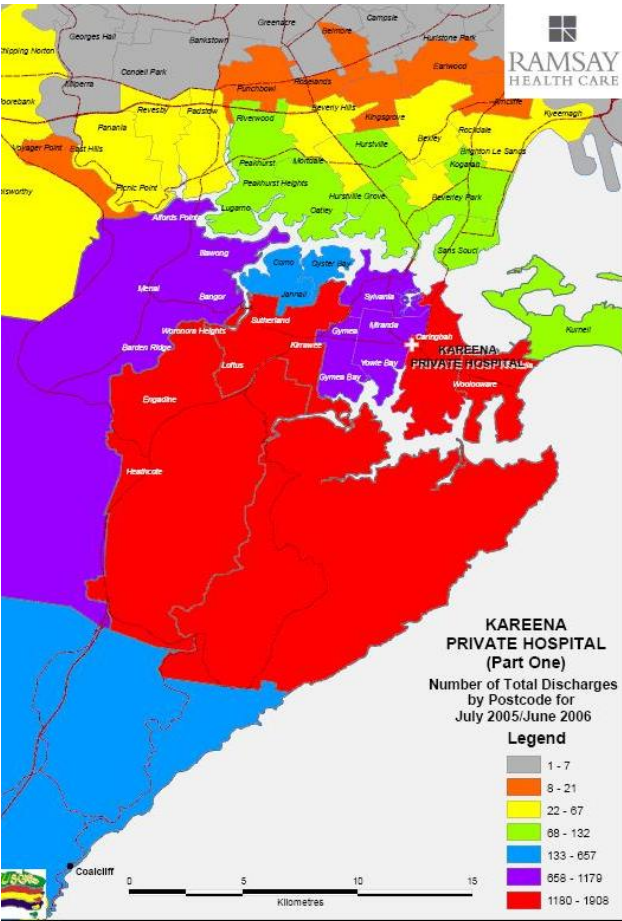
The proposal will have a positive social and economic impact through the provision of much needed inpatient and outpatient services and through synergies with services offered by Sutherland Hospital. To address the question of economic impacts and the costs and benefits associated with the proposed refurbishment and extension of Kareena Hospital, the Environmental Assessment will define the direct, and discuss generally, the indirect economic and fiscal benefits that will be generated as a result of the proposal. The Environmental Assessment will include an estimate of the number of new jobs that will be created during construction phase as well as likely additional permanent full-time jobs in the region once the refurbishment and extension are complete. Additionally, an estimate of the additional

earnings, spending and fiscal benefits (including personal income taxes, GST, and Council tax), that accrue to the various levels of government as a result of this project will be included in the Environmental Assessment.

4.3.1 Social Benefits

The Kareena Private Hospital currently provides a range of medical facilities to the Sutherland Shire community, with the majority of patients (83.5%) being residents of Sutherland Shire Council. However the hospital is regularly operating at 100% capacity and has not had the capability to accommodate further growth due to the limitations in bed capacity and theatre capacity. When at capacity, patients may need to be transferred out of Sutherland Shire for care.

The figure below identifies the number of total discharges over the Sutherland Shire area, recorded from Kareena Private Hospital between July 2005 and June 2006. As can be seen, the greatest concentration of patients treated by the hospital came from Sutherland Shire Council area, which demonstrates that the hospital does care for predominantly local people.



The level of demand for the services of Kareena Hospital is increasing year on year, with the following table demonstrating the projected occupancy of the hospital for 2006/2007.

	Actual 2004/2005	Actual 2005/2006	Actual 2006/2007	Projected 2007/2008
Total Patient Separation	13,592	13,089	14,078	14,715
Inpatient Occupancy	79.3%	78.7%	85.9%	89.1%
Emergency Presentations	4378	4810	5146	5155

As can be seen, the Hospital has been operating at just under 90% capacity since 2006/2007. Ramsay Health Care has indicated that the hospital is regularly operating at 100% capacity (particularly on weekdays and for much of the winter period), on which occasions, both the hospital and Emergency Department are unable to accept further patients at these times. When this occurs, patients often have to be transferred out of the Shire for treatment.

Kareena Hospital has continued to treat more patients over the recent years and in order to continue to provide this service to the local community, the redevelopment of the hospital is required, to improve and expand the facilities available to the patients.

The social benefits to the local and wider region afforded by Kareena Private Hospital include:

- increased employment in an industry which employs a significant proportion of Sutherland Shire residents;
- increased local full-time and part-time employment opportunities;
- increased economic development consistent with both state and local economic strategies;
- increasing the demand and operational capacity of Kareena Private Hospital to meet the increasing health service demands of Sutherland Shire residents;
- increased health and allied services to better meet the current and future needs of the Sutherland community, particularly in the area of ageing population;
- expanded health awareness and education programs in addition to the current range of activities with recognition as 'Health Promoting hospital' under the World Health Organisation;
- improved on-site and formal parking and access arrangement for the Kareena Private Hospital;
- improved safety and security of hospital patients, visitors and employees; and
- building on an existing hospital facility and community focus for Sutherland Shire.

4.3.2 *Economic Benefits*

The economic benefits which would be possible as a result of the of the proposed scheme, are backed up by the recent investment which has already been made to the hospital and which now needs to be supported, in terms of sufficient servicing, etc. This investment is as follows:

- In June 2005, Kareena introduced a new service - Interventional Cardiology, with the commissioning of a Cardiac Catheter Laboratory on site. This new service was introduced in response to a public tender to establish a Catheter Laboratory at the Sutherland Public Hospital (directly opposite Kareena).

- In August 2006, Kareena Private Hospital established an inpatient rehabilitation service, however, due to space limitations and parking restraints, the day rehabilitation services has not been able to be progressed and remains a significant gap in a continuous health service.
- Recently, Kareena Private Hospital opened the upgraded Special Care Nursery to increase capacity to care for sick neonates and at a cost of \$270,000.
- In 2007, Kareena upgraded one of its Maternity ward areas at a cost of \$380,000.

In addition to the medical services and facilities that the Kareena Private Hospital provides, they are also a significant employer in the region. As part of the Caringbah Health Cluster, Kareena Private Hospital provides a significant contribution to local employment. Currently over 300 staff from Sutherland Shire are employed. The Kareena Private Hospital's role in this cluster is that it helps to create a magnet that attracts investment and builds the strengths of the local and regional economy. Its close proximity to Sutherland Shire Hospital also assists in the recruitment of medical specialists to work in the area as they are able to care for both their public and private patients without travelling significant distances.

Kareena Private Hospital provides extensive employment opportunities for the community, with the Hospital currently employing over 450 staff, with approximately 350 staff being either part time or casual workers. Additionally, Kareena Private Hospital employs a further 75 medical doctors, managerial, administration and support staff. Employment services for the community are important, particularly given that 15.7% (or 16,637) of Sutherland Shire residents are employed in the education, health and community services sector.

An assessment of these impacts will be accompanying the Environmental Assessment.

4.4 Traffic and Parking

The subject site is located at the junction of Kingsway and Kareena Road North. A Traffic report will be prepared by an appropriately qualified traffic engineer, which will address traffic generation, car parking provision, service and delivery movements, ambulance access and parking and public transport provision.

4.5 Infrastructure Connections and Upgrades

The existing site is connected to services and utilities. An assessment of existing capacity, as well as any constraints and need for expansion will accompany the Environmental Assessment. These are as follows:

- Stormwater management;
- Sewerage;
- Water supply; and
- Electricity and Gas.

4.6 Built Form, Height and Visual Impact

The design and form of the concept proposal is guided by the need to allow the efficient operation of the hospital while intensifying the use at the site in response to escalating demand as well as maintaining adequate amenity to surrounding residential development.

As has been discussed in Section 1.1, an earlier application had been refused by Sutherland Shire Council in part due to the proposed building height exceeding residential height controls. Plans which set out the concept proposal and stage 1 project application will be submitted as part of the Environmental Assessment for the Part 3A application.

The extended hospital will sit comfortably within the surrounding context in terms of height and scale and will be generally low rise up to 3 stories above the road. The building form, external materials and surrounding landscaping will be designed to respect the adjoining residential properties. Detailed architectural plans and landscaping proposals will be submitted as part of the environmental assessment for the private hospital project application.

4.7 Environmental and Residential Amenity

Acoustic impacts during the construction period and subsequent operation of the expanded Kareena Private Hospital on the adjoining and adjacent land uses will be considered as part of the assessment. It is not anticipated that the proposal would generate any significant acoustic impacts as a result of future operations post expansion. The scheme proposes to alter the location of plant and equipment, and as such an acoustic report will accompany the Environmental Assessment to demonstrate the schemes compliance with relevant standards.

Details relating to the affect of the concept plan in relation to solar access, wind effects and visual privacy will also be submitted with the application.

4.8 Landscaping

Currently there is very little formal landscaping on the site. The concept proposal to expand Kareena Hospital includes proposals for additional landscaping along the Kingsway roadway that will enhance the appearance of the hospital from this main frontage. Landscaping is also proposed on all boundaries to provide a vegetated screen to adjoining uses, despite the built form to these frontages changing little. All significant vegetation is to be retained where possible. Indicative landscaping plans will be submitted as part of the Environmental Assessment for the Part 3A application.

4.9 Waste Management

A development of this nature will generate both common and contaminated waste. An assessment of the waste management facilities and procedures, in particular the treatment of contaminated and pathological waste, will need to be undertaken and provided as part of the Environmental Assessment of the future detailed application.

4.10 Equity of Access and Mobility

Disabled access within and around the site will be addressed in accordance with the relevant provisions of the BCA and NSW Health Facility Guidelines and submitted as part of the Environmental Assessment of the future detailed application.

4.11 Energy Efficiency

Energy performance measures will be included with any future detailed applications to demonstrate compliance with the relevant provisions of the BCA.

4.12 Flora and Fauna Impacts

The site is largely built up with a large proportion of the site being covered with hard surfaces. No known significant flora or fauna exists on the site.

4.13 Demolition and Construction Impacts

Structures associated with the existing hospital will need to be demolished, and accordingly consideration of construction management will be made and included as part of the environmental assessment of future detailed applications. Details will include erosion and sediment control measures and site management including the public and pedestrian safety, access points for construction, construction vehicles and storage of materials.

5.0 CONCLUSION

The proponent's objectives are as follows:

- Provide an opportunity to further strengthen the role of this part of Sutherland Shire Council, as identified in state, regional and local strategic and statutory plans as a regional centre for medical provision.
- Strengthen and compliment the existing cluster of medical services along this part of Kingsway Road, providing opportunities for employment growth.
- Generate further training opportunities and retention of medical expertise in Sutherland Shire Council, seeking to promote Caringbah and Miranda as a centre of excellence in biomedical research and development.
- Promote sustainable use of infrastructure through the refurbishment and expansion of an existing facility, negating the need to develop new facilities on land else where (dissipating the benefits of clustering and taking up land which could be used for other purposes).

The proponent is seeking to submit a Concept Plan to justify the proposed alterations and extension of the private hospital. The Concept Plan will establish the environmental parameters for the extension to the hospital, seeking approval for the general location, use of land, size and height within the site.

Concurrently, the proponent will seek Project Application approval for the Stage 1 component of the extended private hospital. The Project Application will address the detailed design of the works proposed in Stage 1 of the private hospital expansion and be consistent with the concept plan for the entire site.

It is requested that the Minister forms the opinion that the proposed alterations to and the expansion of Kareena Private Hospital is a development of the kind described in Schedule 1, Clause 18 of the Major Projects SEPP 2005 and therefore, is a 'major project' to be determined under Part 3A of the Act. The key reasons that the project is considered to be a Major Project are set out below:

- The development has a capital investment value of more than \$15 million and is for the purpose of providing professional health care services to people admitted as inpatients;
- The development includes works to provide ancillary facilities for day surgery, day procedures or health consulting rooms;
- The site located within an area identified in local, regional and state strategic plans as being an appropriate place to locate development which reinforces the existing cluster of medical facilities; and
- The current scheme is substantially different from that scheme considered under delegated authority by Sutherland Shire.

If the Minister is of the opinion that the proposal is a Major Project then it is requested that the Director General issues the requirements for the preparation of an Environmental Assessment Report to accompany a Concept Plan for the hospital, and a concurrent Project Application for stage 1 of proposed the private hospital expansion.

Should you have any queries about this matter, please do not hesitate to contact the undersigned on 02 9101 2127.

Regards

A handwritten signature in black ink, appearing to read 'Tom Goode', followed by a period.

Tom Goode
Senior Associate
HASSELL