

Part 3A – Project Application
Director-General's Environmental Assessment Requirements
Section 75F of the *Environmental Planning and Assessment Act 1979*

Application No.	MP 08_0169
Project	Kareena Private Hospital, Caringbah
Site	86 Kareena Road and 439 Kingsway, Caringbah
Proponent	Ramsay Health Care
CIV	\$24.7 million
Date of Issue	29/1/08
Date of Expiry	If the environmental assessment is not exhibited within 2 years after this date, the applicant must consult further with the Director-General in relation to the preparation of the environmental assessment
General Requirements	<p>(1) An executive summary;</p> <p>(2) Detailed description of the project including the:</p> <ul style="list-style-type: none"> (a) description of the site including cadastral and title details; (b) A thorough site analysis and description of the existing environment; (c) Suitability of the site for the proposed development; (d) likely environmental, social and economic impacts; and (e) design, construction, operation, maintenance, rehabilitation and staging as applicable; <p>(3) Consideration of the following with any variations to be justified:</p> <ul style="list-style-type: none"> (a) all relevant State Environmental Planning Policies, (b) Sutherland Shire Local Environmental Plan 2006. (c) Metropolitan Strategy 'City of Cities' and draft South Subregional Strategy; <p>(4) Draft Statement of Commitments, outlining commitments to public benefits including State and local infrastructure provision or contributions, environmental management, mitigation and monitoring measures and clear indication of responsibilities;</p> <p>(5) A conclusion justifying the project, taking into consideration the environmental and construction impacts of the proposal, mitigation measures to address these impacts, the cumulative impacts of the proposal, the suitability of the site and whether or not the project is in the public interest.</p> <p>(6) Signed statement from the author of the EA confirming that the information is neither false nor misleading; and</p>
Key Assessment Requirements	<p>The Environmental Assessment must address the following key issues:</p> <p>Urban Form and Design</p> <ul style="list-style-type: none"> • urban design, height, density, bulk, scale and character of the proposal in relation to the surrounding development, landscape and topography; • integration with the existing hospital design; • impact upon the local streetscape, landscape and existing views; • site analysis and architectural plans; • photomontages and view analysis; • details of proposed areas of landscaping and open space; and • external materials and finishes, including a sample board. <p>Amenity impacts on neighbours</p> <ul style="list-style-type: none"> • address the visual impact, privacy and overshadowing of the development on adjoining residential properties; • provide detail of proposed fencing / or landscaping to new car parking areas adjacent to residential properties, paying particular attention to the mitigation of noise and light

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	<p>impacts from night vehicle movements.</p> <p>Transport, Traffic & Access</p> <p>Provide a traffic and transport study that addresses the following:</p> <ul style="list-style-type: none"> • identify existing traffic conditions, road network and road capacity; • assess changes to traffic generation resulting from the project and the impact of this on neighbouring roads and nearby intersections. Address the need for any intersection upgrades if required; • identify existing public transport and other transport services offered by the hospital; • identify Travel Demand Management measures that will optimise the opportunity provided by the hospitals proximity to public transport; • demonstrate a minimalist approach to car parking based on the accessibility of the hospital to public transport and other modes of transport; • detail proposed emergency and public access as well as loading dock(s) arrangements, including potential conflicts between pedestrians and vehicles; and • identify pedestrian and bicycle linkages and facilities for cyclists to support and promote this mode of transport. <p>ESD Measures</p> <ul style="list-style-type: none"> • details of the development's proposed ESD measures including thermal massing, water sensitive urban design measures, energy efficiency, recycling and waste disposal. <p>Construction Impacts</p> <ul style="list-style-type: none"> • noise and vibration; • soil and erosion control; • air quality and air pollution; • stormwater management; • wastes management; • cut/fill and retaining structures; • traffic management, including pedestrian and cyclist circulation and safety; • car parking for construction workers. <p>Operational Impacts</p> <ul style="list-style-type: none"> • noise generation from plant and equipment; • waste management including biomedical, infectious or toxic wastes, storage of any chemicals / hazardous materials; • site security, including 'safer by design' principles in relation to new car parks and public area such as lighting and active / passive surveillance; • emergency and evacuation procedures; • fire safety; • lighting; • signage. <p>Utilities and services</p> <ul style="list-style-type: none"> • address capacity of water, sewer, stormwater, gas, power and telecommunications infrastructure to service the project.
Consultation Requirements	<p>Provide written evidence demonstrating an appropriate and justified level of consultation with the following relevant parties during the preparation of the Environmental Assessment:</p> <ul style="list-style-type: none"> • Sutherland Shire Council; • Roads and Traffic Authority;

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	<ul style="list-style-type: none"> Ministry of Transport; Department of Health
Deemed refusal period	60 days (see Clause 8E of the Environmental Planning & Assessment Regulation)
Application Fee Information	The application fee is based on Capital Investment Value of the project as defined in the <i>Major Projects SEPP</i> and as set out in Clause 8H of the <i>Environmental Planning and Assessment Regulation 2000</i> . To verify the cost of works for this project you are requested to submit a Quantity Surveyor's report for the project.
Landowners Consent	Landowner's consent is to be provided in accordance with clause 8F of the <i>Environmental Planning and Assessment Regulation 2000</i> .
Documents to be submitted	<p>Eight (8) hard copies of the EA with plans to be to scale and A3 in size</p> <p>Five (5) copies of the Environmental Assessment and plans on CD-ROM (in PDF – please ensure all files are less than 2Mb in size).</p>

**SOUTH EASTERN SYDNEY
ILLAWARRA
NSW HEALTH**

Ref: D08/56962

Mr Angus Bradley
NSW Development Manager
Ramsay Health Care
Level 9
154 Pacific Highway
ST LEONARDS NSW 2065

Dear Mr Bradley

I write in response to your letter of 17 November 2008 concerning the request for comments on the proposed expansion of Kareena Private Hospital, Caringbah.

It is noted that the Department of Planning has declared that the redevelopment is now a major project.

South Eastern Sydney Illawarra Area Health Service (SESAHS) has already commented on the proposal in August 2008. From the SESAHS perspective, as there are no further changes made to the proposed works from the previous proposal, we have no further comment to make at this stage.

We note from your correspondence that the Executive team and the Department Heads at Kareena Private Hospital agree that there is a continued need to maintain the formal and informal relationships with their counterparts at Sutherland Hospital in relation to service provision at both hospitals. We look forward to this continued collaboration.

Thank you for the opportunity to comment on the proposal. Should you require any further information, please do not hesitate to contact Julie Dixon, Acting Executive Manager, Strategy and Planning on 4221-6748 or email julie.dixon@sesiahs.health.nsw.gov.au.

Yours sincerely



Terry Clout
Chief Executive

Date: 3/12/08

Brad Harris - 97100859
File Ref: DA07/0252

18 September 2008

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

*Attention: Michael File
Director, Strategic Assessments*

Dear Sir,

**Proposed Expansion of Kareena Private Hospital, Caringbah
Director-General's Environmental Assessment Requirements**

I refer to the Department's letter dated 27 August 2008 requesting Council's advice as to what matters should be included in the assessment of the proposal.

As outlined in the submission by Hassell Pty Ltd the proposed extensions to the hospital have been the subject of a development application that was refused by Council. Council acknowledges that the proposed extension to the private hospital has the potential to provide a social and economic benefit to the residents of Sutherland Shire. However, the assessment of the development application led Council to the opinion that the development as proposed would result in an overdevelopment of the site. Of particular concern to Council was the adverse impact on the streetscape and the likely impact on the amenity of the residents in the vicinity of the site.

The proposal now before the Department under the provisions of Part 3A of the Act is significantly more intense in form and scale than that refused by Council. Council therefore requests that the following key issues be given careful consideration having regard to the context of the site and its relationship to adjacent residential properties.

Traffic and Parking

The adequacy of car parking for both staff and the public needs to be carefully assessed having regard to the impacts of the existing hospital (and the nearby Sutherland Public Hospital) on local residents in adjacent streets particularly Kareena Road, Milford Road and Minnamurra Avenue.

This is an important issue not only for residential amenity but for public safety in an area where there is a high pedestrian flow due to the relationship of the two hospital sites and adjacent medical practices.

The car park arrangement and location of spaces prevents a clear, legible or pleasant path of travel, particularly to the main entrance of the hospital. Generally long paths of travel for pedestrians, past loading bay areas, parked or parking cars through the car park are required to reach the main entry. This has potential implications for the safety of pedestrians within the site and needs to be addressed.

Landscaping

The impact of loss of trees along the Kingsway frontage in particular should be considered together with the need to provide a sufficient level of landscaping to balance the built form.

It is noted that there is no landscaped buffer proposed between the various sections of the car parking area and the adjoining residential properties. This is of concern as it is considered that a sufficient level of screen planting would be required to reduce amenity impacts.

The development would benefit from quality landscaping and particularly the growth of specimen and canopy trees. The absence of suitable landscaped areas within the proposed development concept indicates that the proposal is an overdevelopment of the site.

Noise

There is likely to be noise impacts for adjacent residents due to the proximity of staff parking to dwellings on adjoining sites. This is a particularly important issue as the nature of the development will result in the movement of cars to and from the car parking area at all hours of the day.

Privacy

The close proximity of the proposed additions to residential properties has obvious implications for adjoining residents whose private open space areas back onto the hospital site.

Urban Design

In isolation, the height, bulk and scale of the building may be considered satisfactory however, having regard to the context of the site, the design of the proposal is considered a poor outcome. The subject site is not within a densely developed urban centre or inner city precinct, but a residential area. In this context the bulk and scale of the proposal needs to be carefully considered.

The location of the stairs proposed at the north east corner of the addition (not shown on the elevations) has the potential to impact on the adjoining neighbours.

The stairs adjacent to the eastern boundary do not present as an attractive entryway to the proposed addition. If access to the addition is to be provided from the Kingsway it needs to be considered as part of the total scheme rather than appear as an afterthought. The proposed stepped walkway is narrow and sunken and is considered likely to create an unpleasant environment.

Building Height

At present the low density residential properties in Minnamurra Avenue and Karoola Crescent are adjoined by buildings of a similar height and scale. The height of the proposed additions are significant for the residential properties to the east and this impact needs to be considered.

Clause 33(4) of SSLEP 2006 provides for a maximum building height of 2 storeys and 7.2m to the ceiling and 9m to the ridge. The proposal is significantly higher than this standard and the impacts on the streetscape need to be considered together with the visual impact when viewed from adjacent residential properties.

As such, the proposal requires a significant variation to Council's development standard for height. The applicant's assertion that this is a residential standard that has inappropriately been applied to this site is not supported by Council. This height limit applies to all special uses sites within the Sutherland Shire. Such facilities include schools, churches, utilities and parking facilities. This standard has been in place since 2000 and it is understood that Kareena Private Hospital made no representations in relation to height through the recent LEP process (SSLEP 2006 was gazetted in November 2006).

Loading Facilities

The current loading facility for the hospital is very poor and consists only of a loading area external to the building. Given the proposed intensification to the hospital it is considered that it is a suitable time to provide an appropriately sized and located loading dock which can cater for the needs of the proposed and existing development. Such a facility would ensure that if there were a truck within the loading bay vehicles would be able to safely pass while the truck is unloading.

The proposal does not appear to adequately address the existing conflicts between cars, service vehicles and pedestrians.

Use of Hydrotherapy Pool & Gymnasium

The proposed use of the hydrotherapy pool and gymnasium was not made clear in the development application considered by Council. These types of facilities generally serve both inhouse and outpatients. The applicant's traffic report referred to an outpatient's gymnasium service and the provision of two disabled car parking spaces adjacent to the entry of this facility indicates that it is to be used for outpatients, however this was not clarified. If this facility is to be used for outpatients, then there will be implications in relation to the provision of car parking.

Safety and Security

The current design of the development is considered unacceptable in relation to a number of safety and security matters. Of particular concern to Council is the lack of clear pedestrian pathway from the car park to the main entry of the site.

The current arrangement of walking along the vehicular access way past the loading facility is undesirable and any intensification is unacceptable. Given the nature of the proposed development it is considered appropriate that the design should provide a safe, disabled access compliant grade, between the car parking areas to the main entrance of the facility.

Gas Storage Area

The location of the existing gas storage area adversely impacts on manoeuvring into this site. It is noted that this location was approved with a previous development application however it is considered appropriate that its location be reviewed given the intensification of development on the site.

Proposed Use of No. 439 Kingsway

Council resolved on 28 July 2008 to prepare an amendment to SSLEP 2006 to rezone the site adjacent to Kareena Private Hospital. The draft plan is expected to be returned to the Department for consideration by the LEP Review Panel in the coming weeks.

The draft plan seeks to amend the zoning of the land from Zone 4 – Local Housing under SSLEP 2006 to Zone 12 – Special Uses (Medical Facility) consistent with the zoning of the adjacent Kareena Private Hospital campus.

The proposed rezoning serves to formalise the existing use of the site which is currently used in conjunction with the hospital. Council is of the opinion that the subject lot is a logical extension to the existing hospital campus which will give the hospital greater flexibility in managing its growth.

However, the impacts of the proposed use of this lot needs to be carefully assessed in terms of its impact on adjoining residential properties. In this regard careful attention needs to be given to the use of the site for staff parking as the nature of the use is such that staff on staggered working hours may result in cars entering and leaving the site at late night/early morning hours.

In it's current form, Council would not be supportive of the proposal.

If you require any further information or clarification of the above please contact Brad Harris on 9710 0859.

Yours faithfully

Ron Cummins
Manager, Coastal Environmental Assessment Team
for J W Rayner
General Manager



MINISTRY OF TRANSPORT

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05 SEP 2008

Mr Michael File
Director
Strategic Assessments
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Attention: Annette Birchall

Dear Mr File,

**DIRECTOR GENERAL'S REQUIREMENTS – KAREENA
PRIVATE HOSPITAL REDEVELOPMENT.**

I refer to your letter dated 27 August 2008 seeking advice on the Director General's Requirements (DGRs) for the proposed redevelopment of the above mentioned hospital. The Ministry appreciates this opportunity to provide input to the DGRs for this application.

The Ministry has reviewed the preliminary assessment for the proposal and requests that a *Transport and Accessibility* report be prepared to ensure a broad consideration of transport issues. In this regard, the DGRs should specify the preparation of the report, which should address the following key transport matters:

- Demonstrate a minimalist approach to car parking provision based on the accessibility of the site to public transport. The Ministry is keen to reduce the provision of on-site parking as an effective measure to encourage greater mode shift to public transport together with increased walking and cycling;
- Detail the existing pedestrian and cycle movements within the vicinity of the subject site and determine the adequacy of the proposal to meet the likely future demand for increased pedestrian and cycle access. This may include the requirement for the provision of facilities for the secure storage of bikes together with amenities for cyclists;
- Identify existing public transport services (including frequency) in the site, together with other transport services offered by the hospital;

- Identify Travel Demand Management (TDM) measures that will optimise the opportunity provided by the project site's proximity to public transport. This may include the requirement for the preparation of Travel Access Guide (TAG) as detailed in the *Producing and Using Transport Access Guides* (Roads and Traffic Authority); and
- Identify measures to mitigate potential impacts for pedestrians and cyclists during the construction of the project, as part of a construction management plan.

In addition, the DGRs should include the Ministry of Transport as an agency for further consultation.

The Ministry requests an opportunity to comment on any planning agreement, which has potential to secure funding for local and regional public transport infrastructure.

If you would like to discuss this further, please contact Jose Sevilla Jr on 9268 2833 or email jose.sevilla@transport.nsw.gov.au.

Yours sincerely,



Brendan Bruce
Director, Transport Planning

DG08/04134



The Director
Strategic Assessments
Department of Planning
GPO Box 39
Sydney NSW 2001

Attention: Annette Birchall

**EXPANSION OF KAREENA PRIVATE HOSPITAL, KAREENA ROAD,
CARINGBAH – DIRECTOR GENERAL'S ENVIRONMENTAL ASSESSMENT
REQUIREMENTS**

Dear Sir / Madam,

I refer to your letter of 27 August 2008 (Ref: s08/01145) requesting the Roads and Traffic Authority (RTA) to provide details of key issues and assessment requirements regarding the abovementioned development for inclusion in the Director General's Environmental Assessment (EA) requirements.

The RTA would like the following issues to be included in the transport and traffic impact assessment of the proposed development:

1. Daily and peak traffic movements likely to be generated by the proposed development including the impact on nearby intersections and the need for any intersection upgrades (if required).
2. Details of the proposed accesses and parking provisions associated with the proposed development, including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc).
3. Proposed number of car parking spaces and compliance with the appropriate parking codes.
4. Details of service vehicle movements (including emergency vehicles), approximate times of arrival and departure and provisions for entry and exit driveways and loading docks.
5. To ensure that the above requirements are fully addressed, the RTA requests that a Traffic Management and Accessibility Plan (TMAP) be undertaken for the proposed development site to properly ascertain the cumulative regional traffic impacts associated with development. The TMAP process provides an opportunity to identify a package of traffic and transport infrastructure measures required to support future development. Regional and local intersection and road improvements, vehicular access options for adjoining sites, public transport needs,



the timing and cost of infrastructure works and the identification of funding responsibilities associated with the development should be identified.

6. The RTA will require in due course the provision of a traffic management plan for all demolition / construction activities, detailing vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures.

Further enquiries on this matter can be directed to the undersigned on phone 8849 2047 or facsimile (02) 8849 2918.

Yours sincerely



James Hall
A/Senior Land Use Planner
Transport Planning, Sydney Region

10 September 2008

FILE COPY

POSTED
18/9/08

**SOUTH EASTERN SYDNEY
ILLAWARRA
NSW HEALTH**

Ref: D08/41717

Mr Michael File
Director
Strategic Assessments
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Mr File

I write in response to your letter of 27 August 2008 concerning the request for approval of a Project under Part 3 Major Projects submitted to your Department by Kareena Private Hospital, Caringbah, for the Director-General's Environmental Assessment.

It is noted that a previous Development Application (DA) had been refused by the Sutherland Council in November 2007. The grounds for the refusal of the DA are not documented. A number of key differences between the earlier DA submission refused by the Sutherland Council and the current application for approval have been documented. I would have to assume that the issues resulting in the refusal of the original DA have been addressed in the subsequent submission.

From the South Eastern Sydney Illawarra Health (SESIH) perspective the application appears to adequately address the general requirements for the Environmental Assessment Report as stipulated by the Director-General.

SESIH has one cautionary note in relation to the Preliminary Environmental Assessment of the submission. Under section 4.2 Need - Ramsay Health Care identify that national projections indicate a demand for specialty services including day oncology, renal dialysis and day rehabilitation, and that the demand for these services shall grow dramatically in the next 10 years. SESIH agrees with this projection however, SESIH currently provides some of these services and therefore caution should be taken to ensure that there is continued synergy between the services offered at Sutherland Hospital and Kareena Private Hospital.

Thank you for the opportunity to comment on the submission. Should you require any further information, please do not hesitate to contact Franca Facci, Acting Manager, Planning and Service Development on telephone 4221 6700 or via email franca.facci@sesiahs.health.nsw.gov.au.

Yours sincerely



Terry Clout
Chief Executive

Date:

16/9/08

South Eastern Sydney and Illawarra Area Health Service
Locked Mail Bag 8808 South Coast Mail Centre NSW 2521
Level 4 Lawson House Wollongong Hospital
Tel (02) 4253 4888 Fax (02) 4253 4878
ABN 78 390 886 131

Our Reference:
Your Reference:
Contact:
Telephone

CAC 07M1282 Vol.2
Aleks Tancevski
8849 2313



Hassell
PO Box 5487
Sydney NSW 2001

Attention: Bridget Jarvis

PROPOSED EXPANSION OF KAREENA PRIVATE HOSPITAL

Dear Sir/Madam,

I refer to your letter dated 11 November 2008 requesting the Roads and Traffic Authority (RTA) to provide comments in response to the Director General Environmental Assessment Requirements issued by the Department of Planning for the above mentioned Major Project.

The RTA would like the following issues to be addressed in the detailed Environmental Assessment Report.

1. The RTA requests that a Traffic Management and Accessibility Plan (TMAP) be undertaken for the proposed development site to properly ascertain the cumulative regional traffic impacts associated with development. The TMAP process provides an opportunity to identify a package of traffic and transport infrastructure measures required to support future development. Regional and local intersection and road improvements, vehicular access options for adjoining sites, public transport needs, the timing and cost of infrastructure works and the identification of funding responsibilities associated with the development should be identified.
2. The RTA will require the provision of a traffic management plan for all demolition / construction activities, detailing vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures.
3. Daily and peak traffic movements likely to be generated by the proposed development including the impact on nearby intersections and the need for funding of upgrading or road improvement works (if required).
4. Details of the proposed accesses and parking provisions associated with the proposed development, including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc).
5. The proposed number of car parking spaces and compliance with the relevant parking codes.

6. Details of service vehicle movements (including emergency vehicles), approximate times of arrival and departure and provisions for entry and exit driveways and loading docks.

Any inquiries can be directed to Aleks Tancevski by telephone on 8849 2313, or facsimile 8849 2918.

Yours sincerely,



James Hall

**A/Senior Land Use Planner
Transport Planning, Sydney Region**

9 December 2009