



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

Dear Mr Haddad,

Request for Opinion under Clause 6 of State Environmental Planning Policy (Major Development) 2005, Authorisation to Submit a Concept Plan and issue of Director-General's Environmental Assessment Requirements - Wagga Wagga Hospital Redevelopment

In accordance with Section 75B of the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979) and Clause 6 of State Environmental Planning Policy (Major Development) 2005 (Major Development SEPP), Health Infrastructure seek your opinion that the redevelopment of Wagga Wagga Hospital, is a project to which Part 3A of the Act applies. In addition, and in accordance with Section 75M of the EP&A Act 1979 we seek the Ministers authorisation that a Concept Plan be submitted for the Wagga Wagga Hospital Redevelopment.

Further, we request that the Director-General identifies the Director-General's Environmental Assessment Requirements (DGRs) for a Concept Plan for the site. The purpose of this letter is to provide a Preliminary Environmental Assessment for the proposed Concept Plan that:

- outlines the proposed development;
- briefly reviews relevant environmental planning instruments;
- reviews relevant planning controls; and
- identifies the key issues that will need to be addressed in the Concept Plan

Background

On 10th March 2009, Health Infrastructure wrote to the Director-General seeking an opinion that Part 3A of the EP&A Act apply to the redevelopment of the Wagga Wagga Hospital in accordance with Section 75B of the EP&A Act and Clause 6 of the Major Development SEPP. In that letter it was also identified that a Concept Plan for the site would be prepared and that Director-General's Environmental Assessment Requirements (DGRs) are be sought for a Concept Plan. A copy of the letter is attached.

The Ministers Opinion, under Clause 6(1) of the Major Development SEPP that the proposal for the redevelopment of Wagga Wagga Base Hospital was a project to which Part 3A applied, was received on 26th March 2009 however as that letter referenced the description of the project outlined in a letter dated 10th March 2009, that Opinion is no longer valid. Since the original Clause 6 Opinion was issued the nature of the redevelopment has also changed from one where the whole hospital would be developed into one where the hospital will be redeveloped in stages in accordance with a Concept Plan.

Wagga Wagga Base Hospital (WWBH) is a major Rural Referral hospital, located in southern central New South Wales within the Greater Southern Area Health Service (GSAHS) catchment. This catchment is expected to align with the area to be serviced by the Murrumbidgee Local Health Network (LHN).

WWBH is one the largest and busiest Rural Referral Hospitals in NSW providing approximately 24,000 admissions, 73,000 bed-days, 700-750 births and 7,000 operations each year with an average National CWT of 21,400 separations. WWBH currently offers a broad range of medical and surgical specialties as well as maternity and paediatric services, critical care, mental health and aged care and rehabilitation services. It is the hub for medical and surgical subspecialties in the catchment. The WWBH medical and clinical teams provide outreach services to several District and Community Acute Hospitals and Multipurpose Services (MPS) and enact a regional role in relation to Ambulatory and Community Health Services which includes support for renal patients dialysing at home, mental health, drug and alcohol, sexual assault, and consultancy support for chronic and complex disease management.

Planning processes for the WWBH redevelopment have recognised the importance of developing and strengthening strategic partnerships with other services, local GPs and education institutions. The service configuration and priorities for this project have been developed in consideration of service gaps identified in consultations with local clinicians and other stakeholders, including private and public agencies and confirmed through research in relation to comparative health indicators.

The redevelopment of WWBH represents a strategic capital investment in the health infrastructure of the GSAHS, the soon-to-be-constituted Murrumbidgee Local Health Network and NSW Health. The overall objective is to provide a contemporary healthcare facility suited to the current and future needs of the catchment population. Importantly, this proposal strongly aligns with Commonwealth, NSW Government, NSW Health and GSAHS strategic objectives for the provision of improved health services to regional, rural and remote communities. Improved service integration and strengthened referral networks will provide significantly more accessible services and improved health outcomes to many thousands of residents across rural communities within the WWBH catchment.

The site

The Hospital site is located approximately 1km from the CBD with good access via bus or taxis adjacent to the railway station. Walking time from the CBD is approximately 20-25 minutes. The main vehicular access from the CBD is via Edward Street.

The site has an area of approximately 4.2 hectares on the main campus. The topography of the site is predominantly flat with a fall towards the Edward and Docker Streets corner of around 3.6 metres. There are scattered trees and grassed areas on site.

The property is legally described as DP 659184.



Figure 1 Locality Map

The Wagga Wagga Base Hospital is part of an existing health facility precinct which includes private health facilities, Calvary Hospital and Specialist Practices and Clinics. Almost all of the Specialist Practices and Clinics are housed in Docker Street and Sturt Highway/Edwards Street whilst Calvary Hospital is set south west of Docker Street.

The precinct is loosely bordered by Sturt Highway/Edwards Street to the north, Murray Street to the east, Brooking and Meurant Avenues to the south and Emblen Street to the west. Almost all of the Specialist Practices and Clinics are housed in Docker Street and Sturt Highway/Edwards Street.

The WWBH site itself is bordered by Sturt Highway/Edwards Street to the north, Lewis Drive to the east, Rawson Lane to the south and Docker Street to the west. The main public vehicular access route to car parking and the Main Hospital and Emergency Department is directly off Sturt Highway/Edwards Street down Lewis Drive. Public also have vehicular access to the existing Hydrotherapy facility directly off Docker Street but parking is limited and shared with the UNSW Rural Clinical School.

Public access can be gained around the back of the site via Rawson Lane to the Dental Unit, Community Health and the ARBC Donor Centre and down Yathong Street & Lewis Drive to the Renal Unit and Yathong Lodge. Vehicular access for staff is the same as for public down Lewis Drive to the main car park and in addition a staff car park can be accessed via Yathong Street. Service Vehicles enter the site down Lewis Drive, Yathong Street and Rawson Lane.

Existing Buildings

There are many diverse, old and ad-hoc buildings on the site which have numerous extensions. Dysfunctional spaces within these buildings do not allow development of integrated service delivery models. These spaces result from the number of different buildings, the poor functionality of existing work areas and the limitations imposed by the configuration of the existing buildings.

Inadequacies of the facilities include:

- Inadequate space for ambulatory care services
- Insufficient inpatient beds to meet population growth
- Room sizes are inconsistent with current guidelines
- There is generalised crowding in the emergency and outpatient areas
- Theatres are not well located to promote efficient functional relationships
- Lift services are in need of replacement

- Some buildings have multiple access points without access control systems. This presents a security concern
- Ward configurations are inflexible; there are small numbers of single or double rooms
- There is insufficient storage throughout the facility. This can be an Occupational Health & Safety risk, particularly for services where large pieces of equipment are in regular use
- Lack of meeting and staff training facilities.

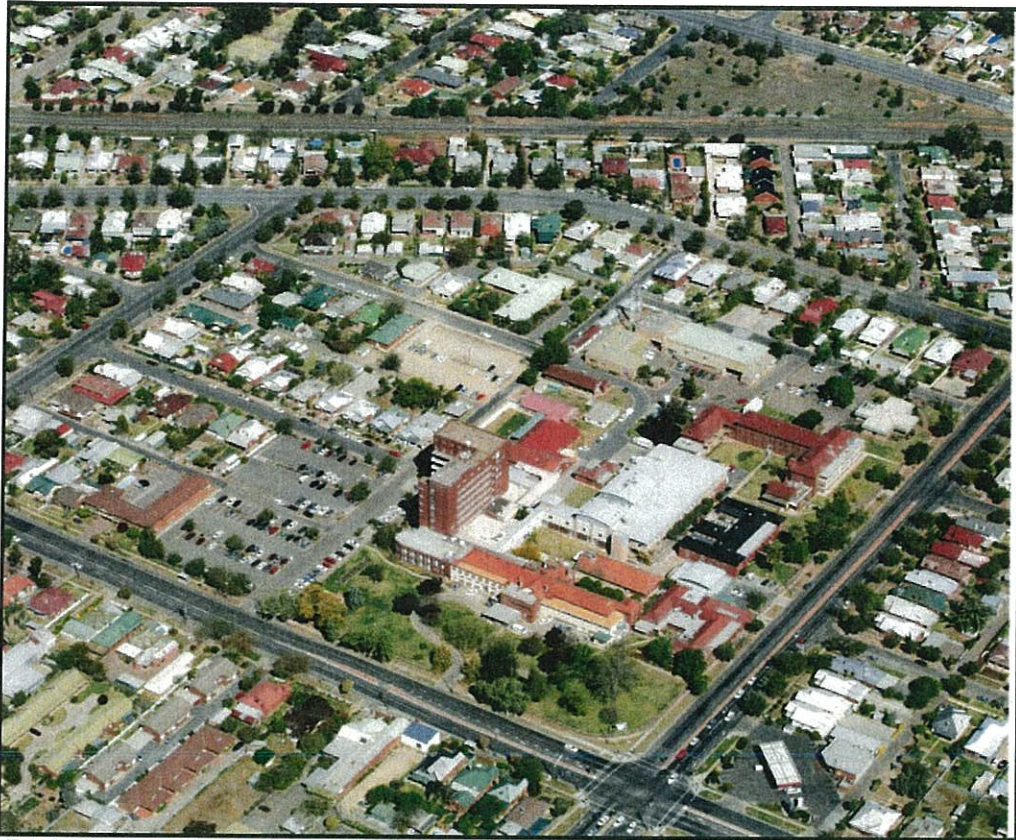


Figure 1 Existing Hospital

The Concept Plan

The Concept Plan seeks approval for the redevelopment of the Wagga Wagga Base Hospital generally in accordance with the master plan attached in Appendix A.

Specifically, the Concept Plan seeks approval for:

- 41,500m² of floor space for a new hospital built on the site of the existing hospital in stages to allow for demolition and decanting of services;
- The footprint of the buildings shown on Plans at Appendix B;
- The maximum heights of the buildings;
- Access and car parking
- Siting of the helipad.

The existing hospital has a floor area of approximately 27,000sqm and a maximum height of eight (8) storeys. The proposed Concept Plan has a maximum height of 6 storeys plus the helipad on the 7th level.

Planning Issues

State Environmental Planning Policies

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

SEPP #	Name	Applies	Compliant
1	Development standards	✓	✓
4	Development without consent		
6	Number of storeys in building		
14	Coastal wetlands		
21	Caravan parks		
22	Shops and commercial premises		
26	Littoral rainforests		
30	Intensive agriculture		
33	Hazardous and offensive development	NK*	
36	Manufactured home estates		
44	Koala habitat protection		
45	Permissibility of mining		
50	Canal estate Development		
55	Remediation of land	✓	✓
62	Sustainable aquaculture		
64	Advertising and signage		
65	Design quality of residential flat development		
71	Coastal protection		
	Housing for Seniors or People with a Disability		
	Major Development 2005	✓	Refer below
	Mining, Petroleum Production and Extractive Industries 2007		
	Temporary Structures and Places of Public Entertainment 2007		
	Infrastructure 2007		
	Rural Lands 2008		
	Exempt & Complying Development Codes 2008		
	Affordable Rental Housing 2009		

* Not Known at this stage

Local Environmental Plan

The site is zoned SP2 Infrastructure (Hospital) under Wagga Wagga Local Environmental Plan 2010 (WWLEP). The objectives of this zone are to:

- provide for infrastructure and related uses; and
- prevent development that is not compatible with or that may detract from the provision of infrastructure.

Apart from Roads, which do not require consent, development for the purposes listed on the Land Zoning Map and any development ordinarily incidental or ancillary to that use requires consent. All other development is prohibited.

On that basis the use of the site as a hospital is **permissible**.

Other issues:

Flooding

A Flood Impact Assessment has been conducted for the site which found that the site is likely to flood on in the situation that the Murrumbidgee River overtops the Main City Levee which is constructed to stop the 1:100 year flood event. All buildings will be designed to take into account the potential of flood with critical services designed to be located at the high point of the site.

Contamination

Laboratory tests of soil samples have confirmed a generally alkaline pH soil which suggests the soil will not be aggressive on steel structures. However the soil was also found to contain high levels of sulphate which is mild to moderately aggressive to concrete. There is no evidence of salinity or groundwater contamination.

Helipad

The Hospital currently uses the Duke of Kent Oval to the north west of the site for helicopter services. Flight paths are currently from south east to north west travelling over the hospital and within sight distance of residences. Transfer is then provided by ambulance. The Concept Plan will seek to locate a helipad on top of the hospital building to reduce patient transfer times and noise and visual impacts for residents.

Application of Part 3A of the Environmental Planning and Assessment Act 1979

Schedule 1 of the Major Projects SEPP sets out those classes of development that qualify as major projects. Specifically, Group 7 'Health and public service facilities', Part 18 'Hospitals' notes 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.

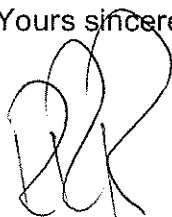
The proposed Wagga Wagga Hospital Redevelopment Concept Plan is consistent with the above non-discretionary criteria with regards to the services it will deliver. The Concept Plan has a CIV of approximately \$320 million and therefore meets the SEPP criteria as a major project.

Request for Director Generals Requirements

If the Minister is of the opinion that the redevelopment of the Wagga Wagga Base Hospital is a Major Project to which Part 3A of the EP&A Act 1979 applies, Health Infrastructure formally request that the Department of Planning issue the Director General Requirements (DGRs) to facilitate the preparation of the Environmental Assessment under section 75H of the EP&A Act 1979.

I trust that the above information is sufficient to enable you to declare this project as a Major Project under Part 3A of the EP&A Act 1979. However if you require any additional information please contact Jeremy Oakes on 0435 868 912 or Leoné McEntee on 96618019. We would be happy to meet with your Department to discuss the proposal at any time.

Yours sincerely

A handwritten signature in black ink, appearing to be 'RR', written in a cursive style.

Robert Rust
Chief Executive