

Draft Central District Plan

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Organisation name: Ramsay Health Care

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First name: Alex

Last name: Belcastro

Suburb: 2065

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ACN: 146 035 707 ABN: 54 146 035 707
Suite 7, Level 7, 100 Walker St,
North Sydney NSW 2060
P 02 9929 6974
enquiries@willowtreeplanning.com.au

Greater Sydney Commission
PO Box 257
Parramatta NSW 2124

Attention: Edward Blakely – Central City District Commissioner

Town Planning Submission in relation to the draft Central City District Plan

Dear Mr Blakely,

This letter has been prepared on behalf of Ramsay Health Care (RHC) and forms a submission to the draft Central City District Plan. This submission specifically relates to Westmead Private Hospital, which is located at 12, 12A, 14 & 14B Mons Road and 13 Darcy Road, Westmead (Lot 1 DP 213094, Lot 1 DP 515289, Lot 1 DP 1022392, SP 64792, Lot 12B DP 449607), within the Parramatta Local Government Area (LGA). Further to the submission made in March of this year to the original draft District Plan, this letter responds to the updated content of the draft District Plan released for public comment in October.

Consistent with the original Draft District Plan, Westmead (**Figures 1 and 2**) is identified as a health and education precinct and acknowledged as one of the largest integrated health, research, education and training precincts in Australia. Already Westmead provides health services to almost 10% of Australia's population. Into the future, Westmead is envisioned to grow into a world-class innovation district and health city with a greater diversity of knowledge-intensive jobs. By 2026, Westmead will have over 2.8 million outpatient visits and over 160,000 emergency department presentations every year.

Westmead is also noted as being vital to the District's economy, with the precinct estimated to provide potential for a total of 50,000 jobs. The continued economic growth of Greater Parramatta is reliant on new opportunities for medical and education services, and associated jobs, in Westmead.

The significance of Westmead in the provision of vital health services to support the region's growing population, as well as its key role in sustaining economic growth and employment in Greater Parramatta, are similarly upheld by RHC.

TOWN PLANNING SUBMISSION

Town Planning Submission to the Draft Central City District Plan
Ramsay Health Care – Westmead Private Hospital

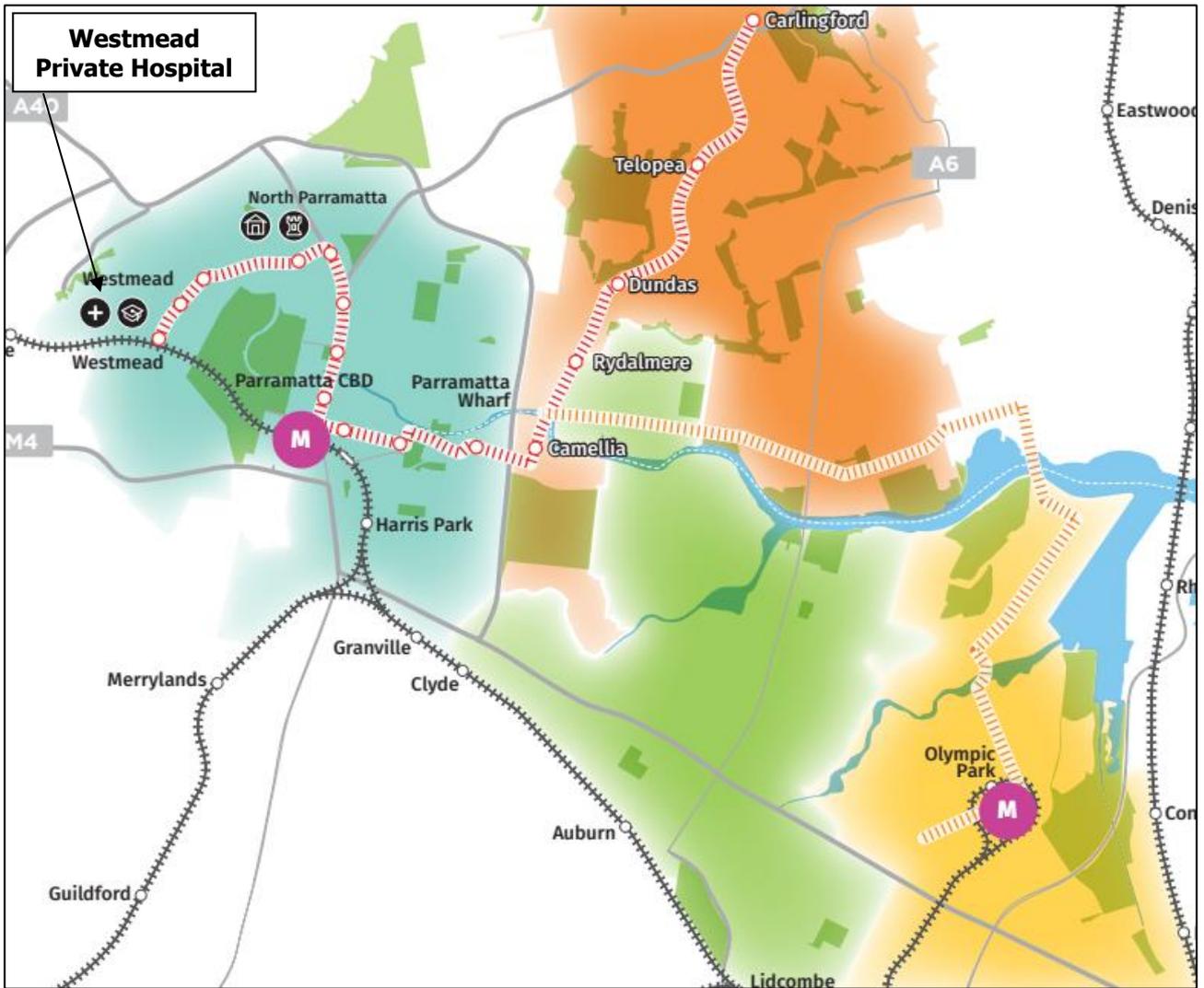


Figure 1. Greater Parramatta and the Olympic Peninsula (GSC 2017)

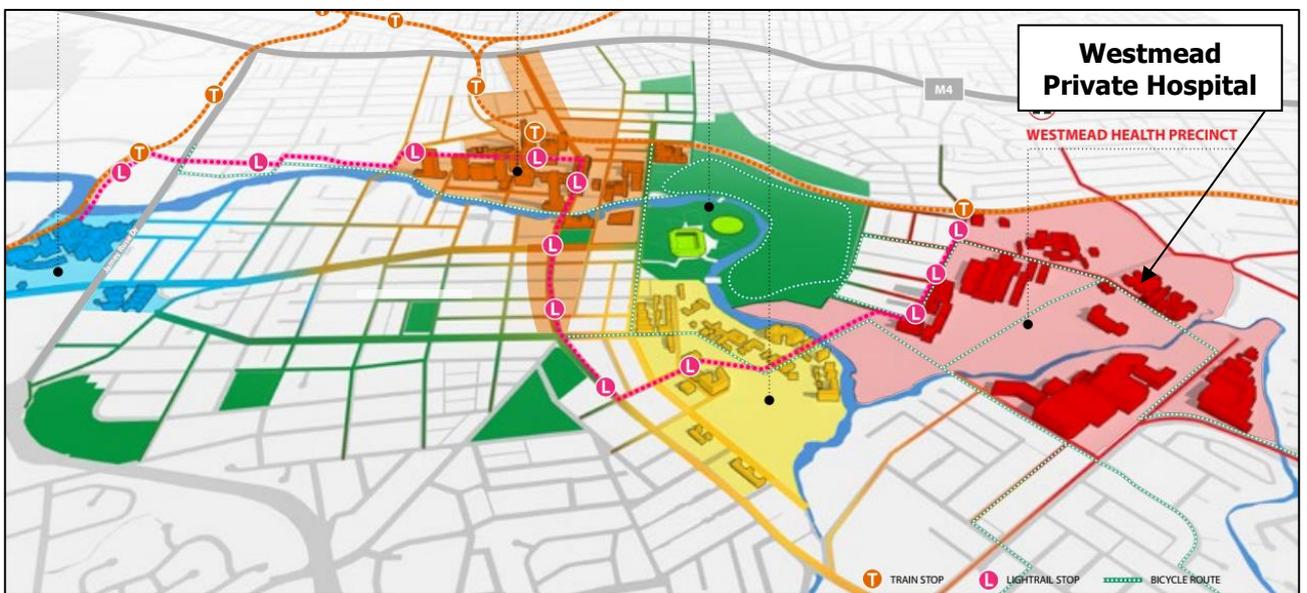


Figure 2. Greater Parramatta and Westmead (GSC 2017)

TOWN PLANNING SUBMISSION

Town Planning Submission to the Draft Central City District Plan
Ramsay Health Care – Westmead Private Hospital

In order for Westmead to fulfill its prescribed role as the most significant health and education precinct in the region and as an innovation district, established hospitals within the precinct must be allowed to expand.

Specifically, Westmead Private Hospital is key to attracting and keeping the best doctors within the Westmead health and education precinct, with significant benefits for both the public and private hospitals as well as the wider precinct. The following growth statistics also demonstrate the increasingly significant role of Westmead Private in the provision of health services:

- An Emergency Department is planned for Westmead Hospital, responding to the growing demand for a private Emergency Department within the precinct and enhancing the availability of private hospital services available within the west comparative to the north and east. A new private Emergency Department will also ease pressure from the public Emergency Department at Westmead Hospital.
- By Year 3, this Emergency Department is forecast to receive 25,000 presentations per annum.
- The number of births at the hospital is forecast to increase to 3,200 per annum over ten (10) years.
- 40% growth in paediatrics is forecast for the ten (10) year period through increased partnership and collaboration with the Sydney Children's Hospital Network at Westmead.
- The total number of hospital admissions is forecast to increase to 45,000 per annum by 2021.
- The current site of Westmead Provide Hospital is forecast to reach capacity in ten (10) years.

The forecast growth in Westmead Private's services and capacity respond to the NSW state government's call for the private sector to play a greater part in the provision of health care. This expansion would also promote the self-sufficiency of the precinct through the provision of additional beds, services and jobs at a lesser cost to the state.

To support this growth and operationalize the required expansion of Westmead Private Hospital's overall capacity and range of service-offerings, the built form on the site must also be allowed to expand. Accordingly, the revision of planning controls to support greater built form parameters of health-specific development, should be incorporated as a 'Priority' within the District Plan. In particular, height and floor space ratio (FSR) controls should be revised so as to not unjustifiably restrict the expansion of the hospital.

Subject to detailed modelling, it is considered appropriate for building heights up to 30m and a 3:1 FSR to be allowed on the site of Westmead Private Hospital. This would support the development of a six (6) storey building (plus plant) and provide sufficient flexibility to enable the planned expansion of the private hospital. As noted though, these numeric standards must be tested to ensure that height and FSR controls complement each other.

Given that the majority of the health and education precinct is not subject to any height or FSR controls (referring to land zoned SP2 Infrastructure), the allowance of higher density built form on the site of Westmead Private Hospital would complement surrounding development (including existing structures and future expanded facilities). In particular, six (6) storey (30m) built form would remain significantly less prominent than other approved development within the health precinct, including 7 storey (31.8m) development for the purposes of the Children's Medical Research Institute (approved under MP08_0159 MOD 1), 8 storey (36m) development for the purposes of the Westmead Millennium Institute (approved under MP10_0050), and 13 storey development (67.8m) for the purposes of the Central Acute Services Building (approved under SSD 7642).

As noted above, these revised Planning controls are essential to allowing the private hospital to aptly contribute to accommodating the increasing demand for health services within Sydney.

TOWN PLANNING SUBMISSION

Town Planning Submission to the Draft Central City District Plan
Ramsay Health Care – Westmead Private Hospital

Consideration should also be offered to land directly adjoining the site of the existing private hospital. To ensure this land (zoned B4 Mixed Use) is developed for appropriate densities of health-specific uses (including expansions of Westmead Private) that positively and strategically contribute to the growth of the health precinct, it is recommended that innovative planning mechanisms are adopted. Such mechanisms may include density restrictions or incentives tied to specific land uses. This is required such that non-health uses are not allowed to erode the integrity of the precinct and hinder the required expansion of established hospitals, whilst ensuring that the development of the land for health-specific uses remains viable.

These development standards are considered efficient and viable mechanisms of ensuring the strategic intent of the draft District Plan (and other relevant strategic planning documents) is translated into implementation. Thereby the amendment of development standards to support increased capacities of health services within Westmead health and education precinct should be included as a priority in the District Plan.

Further to the above, RHC would like to make the Greater Sydney Commission (GSC) aware that the intention is to lodge a State Significant Development Application (SSDA) in 2018. The SSDA is motivated by the need to commence the expansion of Westmead Private Hospital, to accommodate the forecast growth and additional capacity described in the paragraphs above. Should the height and FSR standards applicable to the site not be amended prior to the lodgement of the SSDA, some relaxations to the controls will be required to allow the SSDA to proceed. As demonstrated through this submission, the expansion of Westmead Private Hospital is imperative to accommodate growth and is responsive to the District Plan's intentions for the health precinct as well as the state government's call for private sector contribution.

SUMMARY AND CONCLUSION

In summary, this submission has provided the following recommendations:

- In response to demand for health services, including specifically for *private* health care, Westmead Private Hospital is planning to accommodate increased patient capacity and a diversified service-offering.
- This growth directly responds to the state government's call for the private sector to play a greater part in the provision of health care. This expansion would also promote the self-sufficiency of the Westmead health precinct through the provision of additional beds, services and jobs at a lesser cost to the state.
- Increased patient capacity, additional jobs and new services in association with the expanded function of Westmead Private is also key to the District Plan's vision for Westmead as a transitioning 'innovation precinct'.
- To support the required growth of the hospital, the revision of planning controls to support greater built form parameters of health-specific development, should be incorporated as a 'Priority' within the District Plan.
- Building height and FSR controls should be amended on the site of Westmead Private Hospital, to allow building heights up to 30m and a 3:1 FSR. Detailed modelling must be carried out to ensure that height and FSR controls complement each other.
- To ensure B4-zoned land adjoining the private hospital is also developed for appropriate densities of health-specific uses, innovative planning mechanisms are required. Such mechanisms may include density restrictions or incentives tied to specific land uses.
- To support the upcoming lodgement of an SSDA for the expansion of Westmead Private Hospital, the relaxation of height and FSR standards will be required. This is validated on the basis of accommodating growth, contributing to the District Plan's envisioned creation of Westmead as an

TOWN PLANNING SUBMISSION

Town Planning Submission to the Draft Central City District Plan
Ramsay Health Care – Westmead Private Hospital

innovation district, and responding to the state government's direction for greater private sector involvement in the provision of health care services.

The analysis and review undertaken in support of this submission and here-summarised, demonstrate the strategic significance of Health Care Facilities and Westmead Private Hospital within the Central City District and Greater Sydney. Therefore it is requested that the Greater Sydney Commission pursues the recommendations advised in this submission in order to facilitate a viable and sustainable future.

Yours faithfully,



Chris Wilson
Director
Willowtree Planning