

**Preliminary Review – Health-Care Precinct Adjacent to the Ballina Hospital**

**Purpose:** Consistent with the strategic actions of the Ballina Shire Growth Management Strategy, the purpose of this review is to examine the use of local planning provisions to encourage and facilitate the provision of a health care precinct in the vicinity of Ballina Hospital.

**1. Background Investigations – Council approaches to health-care facilities (HCFs)**

A brief review was undertaken to determine how adjacent Far North Coast councils have addressed health-care facilities within their respective local planning documents.

• **Tweed Shire Council (TSC)**

Tweed LEP 2012 (Tweed CBD only)

The following matters were determined to be of relevance to this investigative process:

- The land surrounding Tweed Hospital is currently zoned R3 – Medium Density - HCFs are permissible with consent within this zone.
- According to a planner from TSC, a conscious decision was made during preparation of the Tweed LEP not to prioritise the hospital surrounds for HCFs due to identified constraints of the locality, namely flooding and the land being subject to the impacts of climate change.
- Tweed LEP 2012 is subject to the provisions of State Environmental Planning Policy 2007 (Infrastructure) ISEPP). Therefore, HCFs are permissible with consent in the R3 zone, consistent with this SEPP.
- It is understood that TSC may identify a medical precinct somewhere, (an economic study is currently underway) in the future. However, this precinct may not be adjacent to the hospital due to the identified hazards.
- No special provisions for HCFs are applicable in the current Tweed LEP or Development Control Plan (DCP) regulations.

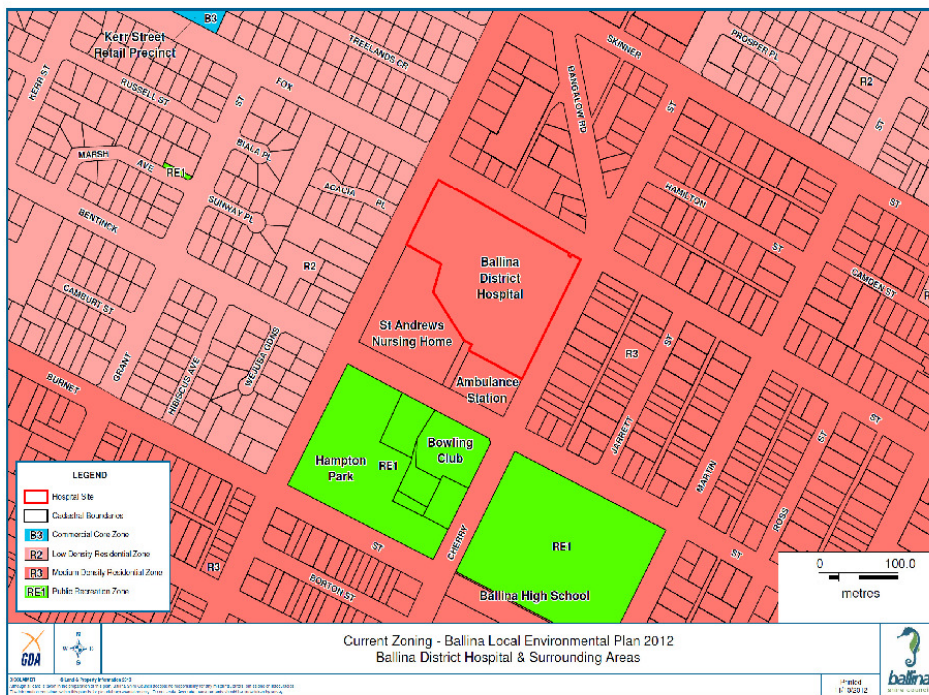
• **Lismore City Council (LCC)**

Lismore LEP 2012

- Some parcels of land adjacent to Lismore Base Hospital were identified within the now redundant Lismore LEP as 'special use' consistent with the adjoining hospital. However, since the making of the new plan, all land surrounding Lismore Base Hospital is zoned R1 - General Residential. Under the landuse zoning table of the new Lismore LEP 2012, Health-care facilities are permissible with consent within this zone.
- A LCC planner advised this Council may investigate a specific DCP for medical related uses surrounding the hospital to provide some use-specific flexibility with provisions such as carparking. However, no special provisions have been incorporated into the DCP or LEP at this time.

• **Ballina Shire Council**

Land surrounding the Ballina Hospital is zoned RE1 - Public Recreation, R2 - Low Density Residential and R3 - Medium Density Residential under the provisions of the Ballina LEP 2012 (Map 1).



**Map 1 – Ballina Hospital Locality Zoning Map**

The parent definition 'health services facility' (HCF) and its 'children' are permissible in the R3 - Medium Density Residential zone, however, are prohibited in the R2 - Low Density Residential zone. HCFs are also prohibited in the RE1 zone.

State Environmental Planning Policy (Infrastructure) (ISEPP) includes provisions for public authorities on State land that is in a land use zone identified by another environmental planning instrument as "special use" zone for a health services facility. However, the locality does not contain such a zone. The ISEPP also permits certain development without consent on land within a prescribed zone by a public authority. These works are limited to development associated with existing services associated with a hospital and are subject to certain restrictions.

As discussed with the Tweed and Lismore localities surrounding the corresponding hospitals, the ISEPP provides for HCFs with development consent within the R3 - Medium Density Residential zone. However, HCFs within the R2 and RE1 zone are not identified as prescribed zones pursuant to this ISEPP, and therefore, health services facilities are not permissible via the provisions of this ISEPP.

## **2. Current landuse analysis surrounding Ballina Hospital**

As a background to this review, a landuse analysis was undertaken of the locality surrounding the Ballina Hospital. It was observed that existing lots surrounding the hospital currently contain very few medical or health related services. Specifically, only four individual residential lots within the precinct immediately surrounding the hospital contain uses related to health services. Of these uses, two are chiropractors, with others being social services (Harmony House and the Ballina District Community Services Association). However, St Andrews Nursing Home adjoins the hospital as does Ballina Ambulance Station and the Ballina Rehabilitation Unit. In addition, although the Biala site is a school, the hospital may provide some services for the students attending this school for children with special needs.

The assembling of similar types of services within a particular locality would have some advantages in regard to ease of access and convenience when requiring health related services. The promotion or encouragement of services in the locality surrounding the Ballina Hospital and its related, such as the rehabilitation unit, would have some benefit for clients that require a range of services. The focus facility being the hospital is considered a logical starting point.

## **3. Ballina Hospital overview**

Ballina Hospital is a local hospital providing between 50 and 100 beds. Services include dialysis, cancer treatment, out-patient services, some day surgery procedures and an emergency department (sourced from North Coast Area Health website). Linked to the hospital are community services such as an immunisation clinic. The site also houses a rehabilitation unit and accommodation for medical staff in training. The major medical facility for the Ballina area is, however, Lismore Base Hospital or alternatively, Tweed Hospital. Private Hospitals such as St Vincent's in Lismore and John Flynn at Tugun are patient alternatives.

### **Ballina Shire Growth Management Strategy (GMS)**

The GMS has an identified strategic action being the investigation of a health-care precinct in proximity to the Ballina Hospital.

The GMS provides various items of background information to assist in determining the 'pros' and 'cons' of a health-care precinct in proximity to Ballina Hospital. The following facts sourced from this document are considered relevant.

- Ballina is a developing major centre. The Shire will attract an additional 13,500 persons over the next 25 years. It is projected that of this population, over 31% will comprise residents 65 years of age and older. A declining average household size has the effect of increasing the number of dwellings required to accommodate this increasing population.

- Currently, the health care and social assistance industry employs 15.4% of the workforce population, the highest employment industry in the Shire (2011).
- The Ballina Shire Retail Strategy identifies a retail centre hierarchy for the Shire. The hierarchy establishes the Ballina Town Centre and the Kerr Street retail precinct as primary retail precincts for the shire. The strategy indicates that these precincts should be protected.
- A number of retail trends are pertinent to the protection of these precincts. The trend for larger stores and larger centres has been evident for many years, such as the establishment of the Kerr Street precinct and quasi retail and bulky goods outlets in Southern Cross industrial estate. Another trend is the ongoing pressure from 'big box' retailers and supermarkets to develop outside existing commercial areas.
- A commercial land audit undertaken for the Ballina Shire indicates that the supply of existing commercially zoned land in this local government area is sufficient to accommodate the projected commercial demand for the forthcoming planning period (to the year 2028). While this assessment does not include potential areas for future commercial land, the audit suggests that sufficient supplies exist for commercial purposes within Ballina Shire.

#### **4. Landuse analysis for existing HCF's in Ballina**

In conjunction with the background research for this study, a review of the existing locations for health care services in Ballina was undertaken. Tamar Street in Ballina, particularly sections between Cherry and Norton Street or Moon Street and Kerr Street, each contain 10 or more health related services such as pathology, optometrists, x-ray services and medical centres. The local yellow pages confirm that most of Ballina's GP clinics are located in Tamar, Martin, Moon or Grant Streets, Ballina.

Currently, most of Tamar Street is zoned B3 Commercial Core under the Ballina LEP 2012 with a small portion on the eastern end being zoned R3 - Medium Density Residential.

The street does still contain a number of aging residential dwellings, residential flat buildings and tourist accommodation in addition to a number of vacant commercial premises.

These observations indicate that a majority of the current health services are located within the commercial core directly adjacent to the main street of Ballina (River Street).

#### **5. Benefits of a health care precinct adjoining the hospital**

It is recognised that a health-care precinct with the hospital and ambulance as a focal point would have the following advantages:

- One stop shop and improved access options for clients seeking multiple services; and
- Centralisation of this sector.

However, the Ballina locality has a number of mitigating circumstances that are considered to counteract these benefits.

**6. Location of Hospital relative to the Central Business District (CBD)**

It is recognised that services adjacent to the hospital would provide some benefits to patients seeking multiple services. As previously mentioned, a number of services already exist in this location.

However, the current concentration of health care services in Ballina such as medical centres, pathology and dental services are located less than 1km away in Tamar Street, within the Ballina CBD. This concentration of services offers advantages to clients, in that a range of facilities are contained in one locality and clients have ease of access to other associated services such as pharmacies in River Street.

Public transport bus routes occur along Cherry Street, Tamar and Moon Street, providing convenient public transport links to the hospital precinct. However, this bus route also provides good access to the Tamar Street locality where these various health services currently exist.

There is also potentially significant benefit to the function and viability of the CBD through the presence of these services within and in proximity to the town centre.

**7. Pseudo expansion of commercial land via the promotion of a Health-care facilities precinct adjacent to the hospital.**

It is acknowledged that the ISEPP and the Ballina LEP 2012 permit HCFs within the R3 - Medium Density Residential zone. Therefore, these uses are permissible within the residential precinct east and north of the Ballina Hospital. However, a number of facts, trends and issues arising from the GMS lead to some possible justification for not encouraging this precinct away from the existing commercially zoned land utilising additional planning tools. These are:

- The GMS has stated that the shire has sufficient commercially zoned land until 2028. Therefore, the encouragement of commercial uses such as HCFs outside the current commercially zoned precincts is in excess of the current anticipated future demand.
- The promotion of a HCF precinct away from the current CBD may jeopardise the current strength of the CBD. This matter is considered more pertinent in the current fiscal environment, with a number of vacant commercial premises present within the Ballina CBD at this time.
- The trends for larger retail spaces away from the CBD place further strain on the existing commercial precinct in Ballina. The retention of health services within the CBD could be critical to maintaining the vitality of the CBD, considering the potential decline of other commercial activities, for various reasons, such as online retailing.
- There appears to be sufficient supply of commercial premises in the CBD area at present. Therefore, existing options for use of established commercial premises appear readily available.
- The existing physical makeup of most commercial premises within the CBD would likely adapt well to health services, having regard to flexibility in size requirements

and lack of specialist building demands for many health-care facilities. This has a direct influence upon a potential tenant's choice of location for a particular health service.

In the current economic climate, it would appear far more likely for a HCF to opt for an existing property in Tamar Street or in the commercial locality than source a property that requires major works for conversion simply due to its proximity to the Ballina Hospital. The leasing of an existing commercial space within the CBD is likely more economical for a health-related service in the current economic climate, rather than the lengthy, costly and uncertain processes associated with the establishment of a business within an existing residential dwelling (or building a new premises), simply due to its location adjacent to the Ballina Hospital. Problems associated with finding a suitable site and potential neighbourhood objections would also likely deter any HCF proponent when other options are readily available.

#### **8. Size and services at Ballina Hospital**

The size and extent of services provided by Ballina Hospital impacts upon the need for HCFs to be located in close proximity. Ballina Hospital is a relatively small hospital and only provides a limited range of services. For example, the hospital does not provide certain services such as obstetrics. Therefore, these associated specialists do not require consulting rooms in close proximity to the hospital. This issue is considered to be a contributing factor towards the demand or lack thereof for a medical precinct within the Ballina Hospital locality.

The location of the hospital relative to the CBD may also contribute to the demand for a medical precinct within the land immediately adjacent to this facility. Medical practitioners that do attend Ballina Hospital for services may consider the Tamar Street CBD sufficiently close enough for the convenient access to the hospital as required.

Alternatively, to use Lismore Base Hospital as an example, this facility is located some distance from the CBD, therefore, any location of services for convenience would be unlikely to utilise the Lismore CBD.

It is considered unlikely in the short to medium term that the range of services at the hospital will expand considerably, with a trend for health services to be concentrated into larger hospitals such as those in Lismore and Tweed Heads.

#### **9. Current uses adjacent to the Ballina Hospital**

The hospital precinct currently features a number of larger uses that are not likely to relocate or cease operating. Ballina High School and the Ballina Bowling Club are static uses immediately adjoining the hospital precinct that are likely in the short to medium term to remain in their respective current locations. These static uses limit the availability of land for HCFs to urban land to the east and north of the hospital.

The land to the east and north of the hospital is zoned R3 - Medium Density Residential. Considering the trend towards smaller households and the GMS identification of infill housing within the urban locality, this area of R3 land may be considered more appropriate for infill housing. The land is flat and offers reasonably good public transport services. Amenity wise, the locality is close to North Creek, public recreation areas and footpaths.

#### **10. Other notes**

Council's Development and Environmental Health Group has advised that very few inquiries have been received regarding the use of land surrounding Ballina Hospital for HCFs.

During discussions with this Group, traffic matters were also raised. Observations of the precinct reveal that the hospital block has limited parking opportunities onsite due to ongoing expansion, resulting in a high demand for on-street parking. Any HCF precinct in this vicinity may exacerbate this existing issue.

Further, the intersection of Fox and Cherry Streets has some cause for concern due to traffic speeds and volumes for traffic crossing Cherry Street from either side of Fox Street. This intersection is potentially the central intersection for a HCF precinct if such was to be located to the north and east of the hospital site.

#### **11. Preliminary findings**

Having regard to the research undertaken during this investigation process, it is considered difficult to justify the need for an identified health-care precinct supported by specific local planning provisions in the vicinity of the Ballina Hospital.

While it is recognised that the ISEPP permits the development of existing medium density zoned land to the north and east of the subject land for HCFs, this analysis has not identified any substantial reasoning to justify Council actively promoting a HCF precinct in the locality surrounding the hospital through its planning provisions, particularly in the short term.

Key factors in support of this conclusion are summarised as follows:

- The GMS identifies that Ballina Shire currently has sufficient supplies of commercial land to satisfy demand until 2028 (based on the Ballina Shire Industrial and Commercial Land Use Review undertaken by Geolink on behalf of Council in 2008). Therefore, the active encouragement of additional commercial uses within Ballina outside existing areas planned for these uses is contrary to these findings.
- Ballina Hospital, due to its relatively small size and current range of services, may not have the demand for HCFs, such as specialist practitioners immediately adjacent to the hospital. Therefore, there may not be a high demand for specialist consulting rooms in close proximity to the hospital. This is currently evidenced by the lack of associated practices nearby in comparison with Lismore Base Hospital, being surrounded by a variety of specialist services directly related to this hospital.
- Practitioners may consider that Tamar Street is sufficiently close to the hospital for the purposes of convenience when determining the location of consulting rooms. This may already be a contributing factor to the location of many HCFs in Tamar Street. Therefore, practitioners may not consider locating immediately adjacent to the hospital as being essential, considering Tamar Street is less than 1km away.
- The current state of the economy and changing retailing trends have led to a current oversupply of commercial premises within the Ballina CBD. The CBD currently contains a number of vacant commercial premises. Any new businesses, including HCFs may have bargaining power in regard to leasing arrangements in this economic climate. This may deter practitioners from attempting a costly setup of a new business in the precinct

immediately adjacent to the hospital, simply due to proximity, when various existing vacant premises are located less than 1km away within the Ballina CBD.

- The land adjacent to Ballina Hospital is constrained due to current uses such as Ballina High School and the Ballina Bowling Club. It is considered unlikely that these established developments will relocate in the short or medium term. Therefore, HCFs are currently limited to urban land to the north and east of the hospital site, as this land is medium density residential and subject to the ISEPP provisions for HCFs. Land directly to the west of Ballina Hospital is not appropriately zoned for HCFs, being R2 - Low Density Residential. The R2 zone is not a prescribed zone within the ISEPP and BLEP 2012 does not permit HCFs in this zone.
- The existing Tamar Street commercial land currently contains a concentration of health services. This concentration has the potential to attract other HCFs due to advantages associated with the grouping of similar services for potential clients. This concentration may also result in HCFs preferring this location rather than in close proximity to the Hospital.