



# INNER WEST COUNCIL

16/SF409

1 August 2016

David Gibson  
Team Leader, Social Infrastructure Assessments  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2000

Dear Mr Gibson

**Development application for Multi-storey Staff Carpark (SSD 7542)  
At Royal Prince Alfred Hospital, Church Street, Camperdown**

Reference is made to your letter dated 14 June 2016 inviting Council's comments in relation to the above development application (DA) submitted on behalf of Health Administration Corporation, pursuant to Part 4 of the Environmental Planning and Assessment Act (EP&A Act).

It is noted that the proposal is State Significant Development and has been assessed under Division 4.1 of Part 4 of EP&A Act. It is also noted the purpose of the project is to "deliver replacement and additional staff parking in the north west of the RPA Hospital site to meet current demands" (pg.5).

Consultation with planning officers at former Marrickville, Ashfield and Leichhardt councils was undertaken and a co-ordinated set of officers' comments for Inner West Council are offered below.

## Traffic Generation

The demand for parking has been identified as necessary due to the expansion works within the hospital site, therefore reducing parking on site. Existing travel patterns to and from the RPAH Campus were assessed in the Environmental Impact Statement (EIS) from journey-to-work data. The data shows that the predominant mode of travel is by private car for those people working in this area, and such demand is expected to remain high. Accordingly, the EIS does not provide data on spillover of on-street parking demand into surrounding streets. It is imperative to assess current parking demand and the impact of parking proposed for this precinct. This is necessary as it is stated in the EIS that there has been a shortfall of parking spaces through reductions of on-site parking and increased parking demand from new facilities in the precinct.

## Customer Service Centres

**Ashfield** | P (02) 9716 1800 | E [info@ashfield.nsw.gov.au](mailto:info@ashfield.nsw.gov.au) | 260 Liverpool Road Ashfield NSW 2131

**Leichhardt** | P (02) 9367 9222 | E [leichhardt@lmc.nsw.gov.au](mailto:leichhardt@lmc.nsw.gov.au) | 7-15 Wetherill Street Leichhardt NSW 2040

**Petersham** | P (02) 9335 2222 | E [council@marrickville.nsw.gov.au](mailto:council@marrickville.nsw.gov.au) | 2-14 Fisher Street Petersham NSW 2049

The Transport Impact Assessment by GTA Consultants states it aims to facilitate travel to the precinct by car for staff. This aim does not align with A Plan for Growing Sydney and relevant Inner West Council and Transport for New South Wales (TfNSW) land use and transport policies. Although the report addresses potential sustainable transport measures, it contradicts itself by promoting use of the private vehicles, with the proposal not including any sustainable transport measures. Dedicated car share bays, cycle racks and end-of-trip facilities are not proposed to be integrated into the carpark.

The City of Sydney Local Environmental Plan (LEP) 2012 states in Clause 7.18 that development should not be granted unless it can be satisfied that the “development will not encourage persons to travel in private vehicles between 7am and 9.30am or between 3.30pm and 7pm on weekdays” (pg.36). The GTA transport report identifies the peak periods for staff movements are 7am-7.30am and 3.30-6pm, which contradicts the City of Sydney LEP.

Peak periods of staff travel at RPAH (as outlined in the EIS) are such that the new carpark will generate traffic during times that are not encouraged by the City of Sydney LEP, as outlined above.

Sydney Development Control Plan (DCP) 2012 Section 3.11 (as quoted in the EIS pg.37) refers to the provisions of the DCP pertaining to car parking. The DCP seeks to “discourage commuter car parking ... or pertain to car parking as part of commercial or residential development”. The proposal therefore contradicts the DCP.

It is acknowledged that hospital staff work shifts across a 24-hour period 7 days per week (24/7) and that public transport cannot cater for all of this. However it is outlined in the EIS that the peak periods for staff travel are 7am-7.30am and 3.30pm-6pm - times when public transport is operating at its peak. During this period, public transport could and should be utilised by a majority of hospital staff in the precinct.

### Operation of the Carpark

The proposal seeks approval for a multi-storey staff carpark to operate 24/7 at RPAH. A point of concern is the exclusivity of the carpark for hospital staff rather than patients and/or visitors. A travel demand management (TDM) approach should be used to manage staff movements (which are more predictable than visitors) and provide transport for staff with car parking as a back-up rather than it being the primary means of access.

It is also recommended that TDM principles are used for staff trips to encourage active transport, rather than focussing on private vehicle trips (with associated parking) as the primary means of access. A large carpark as proposed will place significant additional traffic pressures on local roads in and around this major trip-generating precinct. Roads in and around the precinct are already constrained and congested, and adding a major car park will only worsen this. One of the most effective TDM measures for achieving a mode shift away from private vehicles is to limit the availability of parking. It appears the actions proposed by the transport report are not consistent with the report's objectives.

### Active Travel

Encouraging access to local destinations by active modes of transport can create healthy built environments. This is supported by the NSW Health Healthy Urban Development Checklist 2009. Active modes are forms of non-motorised transport involving physical activity, such as walking and cycling. The integration and quality design of public transport,

as well as accessibility of public transport to and from key destinations, can support healthy urban development. The proposal does not contribute positively to a built environment that supports the health of the staff.

The EIS states that the proposed development is located outside of Central Sydney and the hospital and site are not identified as 'Category F' on the Public Transport Accessibility Level Map (PTALM). The EIS states that "the proposed development will not adversely contribute to the operation of the surrounding road network, or public transport movements" (p.36). Given the site's close proximity to public transport, it is doubted that additional parking facilities are in fact required to ensure the efficient operation of this health facility.

### Signage

The quality of signage and wayfinding for motorists is imperative to minimise cruising for parking and ensure there is an efficient flow of traffic throughout the precinct. Car park signage has been proposed for the development to identify the number of available spaces. It is recommended that the consent authority include conditions of consent to ensure adequate signage is integrated at all entry and exit points of the development to guarantee wayfinding for staff and the community.

### Conclusion

It is apparent from the above discussion that Council has many concerns about this proposal and does not support it. At the very least, the proposal's aims should be aligned with those of relevant NSW Government policies – particularly A Plan for Growing Sydney, the NSW Long Term Transport Master Plan 2012 and NSW Health's own Healthy Urban Development Checklist 2009. Should the proposal proceed, all the issues identified in this submission should be addressed through conditions of consent.

Please direct any enquiries to Suzannah Byers, Strategic Planner, Planning Services (Petersham) on 9335 2116 or Simon Lowe, Strategic Transport Planner (Petersham) on 9335 2245.

Yours sincerely

A handwritten signature in cursive script that reads "Kendall Banfield".

Kendall Banfield  
**Acting Manager Planning Services**