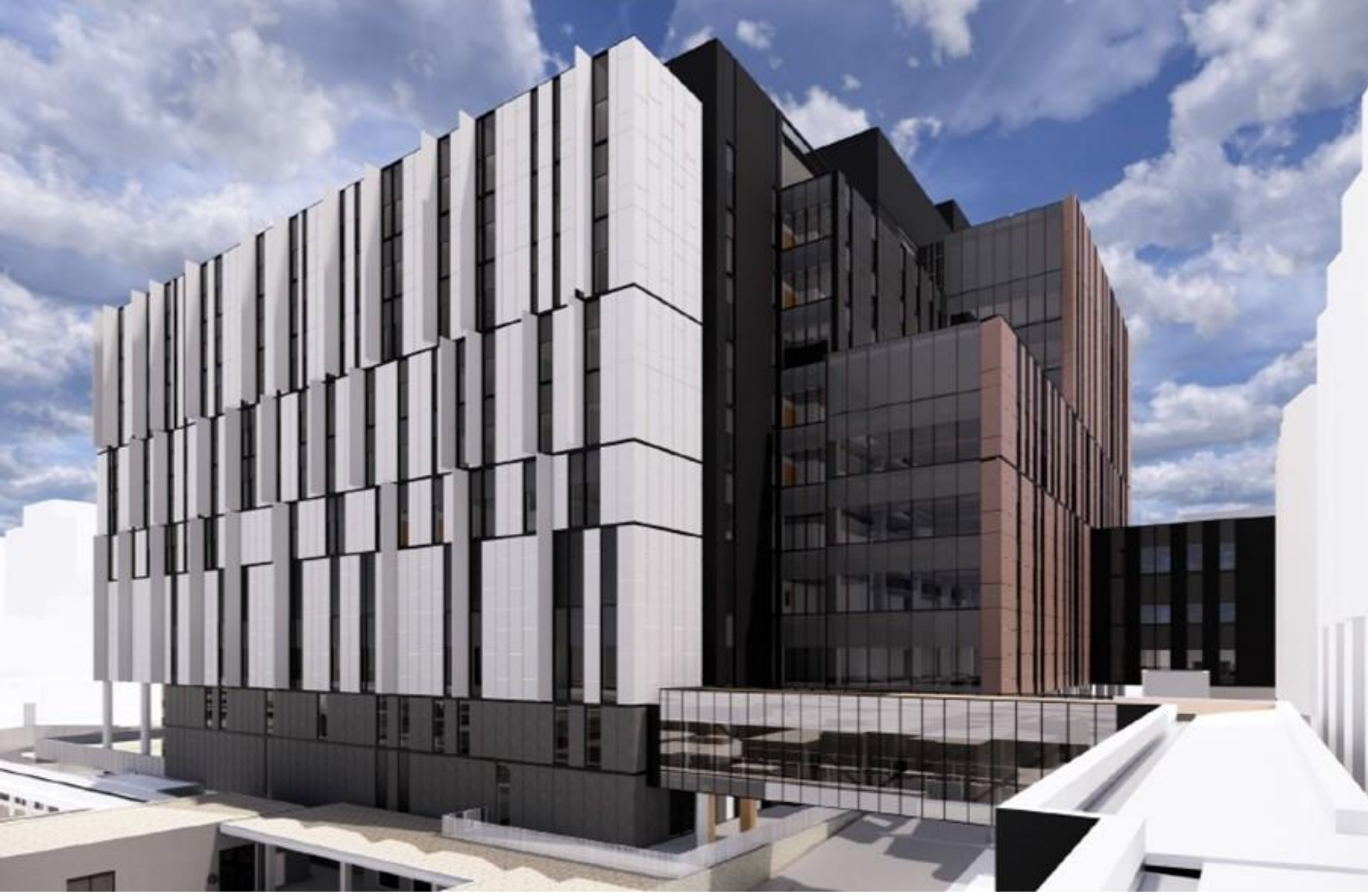

Response to Submissions Report

Prince of Wales Hospital - Addition to approved Acute Services Building (SSD-10339)

NSW Health Infrastructure

1 November 2019

Level 17, 141 Walker St
North Sydney NSW 2060
Australia

301015-03835

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NSW GOVERNMENT Health Infrastructure

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301015-03835 – Response to Submissions Report: Prince of Wales Hospital - Addition to approved Acute Services Building (SSD-10339)

Rev	Description	Author	Review	Advisian approval	Date
0	Final	D Zhou	C Jones	R Power	23/10/2019
1	Revised Final	D Zhou	C Jones	R Power	01/11/2019

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Appendix list

Appendix L Aviation SSDA Update

Acronyms and Terms

Acronym/Term	Definition
AEP	Annual Exceedance Probability
ASB	Acute Services Building
BAM	Biodiversity Assessment Method
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
BOH	Back of House
CASA	Civil Aviation Safety Authority
Council	Randwick City Council
CNVMP	Construction Noise and Vibration Management Plan
CPTMP	Construction Pedestrian and Traffic Management Plan
CSELR	CBD and South East Light Rail
CWTS	Construction Worker Transportation Strategy
DA	Development Application
DDA	Disability Discrimination Act
DPIE	Department of Planning, Industry and Environment (NSW)
EES	DPIE Environmental, Energy and Sciences Group (NSW)
EIS	Environmental Impact Statement
EOT facility	End-of-trip facility
EP&A Act	*Environmental Planning & Assessment Act 1979* (NSW)
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000* (NSW)
EPA	Environment Protection Authority (NSW)
ESD	Ecologically sustainable development
GA NSW	Government Architect NSW
HI	NSW Health Infrastructure
IASB	Integrated Acute Services Building
MCDA	Mary Dallas Consulting Archaeologists
NCC	National Construction Code
OEH	Former Office of Environment and Heritage (NSW), now a part of EES
PCT	Plant Community Types
Precinct	Randwick Health and Education Precinct
Project	Randwick Hospitals Campus Redevelopment
Proposed development	Construction and operation of the extension to the approved Acute Services Building
RMS	Roads and Maritime Services (NSW)
ROL	Road Occupancy Licence
RTS	Response to Submissions
SCO	Sydney Coordination Office
SEARs	Secretary's Environmental Assessment Requirements
SESLHD	South Eastern Sydney Local Health District
SSDA	State Significant Development Application
TfNSW	Transport for NSW
TIA	Transport Impact Assessment
UNSW	University of New South Wales

1 Introduction

Advisian has been commissioned by NSW Health Infrastructure (HI) (the Applicant) to prepare the Response to Submissions (RTS) Report for State Significant Development Application (SSDA) Number SSD 10339.

1.1 Background

The Environmental Impact Statement (EIS) for this project was prepared by Advisian in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued by the Department of Planning, Industry and Environment (DPIE) under covering letter dated 14 August 2019 and pursuant to Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and submitted on 20 August 2019.

The SSDA seeks development consent for the construction and operation of an extension (herein referred to as the "Integrated Acute Services Building (IASB) Addition" to the approved Acute Services Building (ASB) (SSD 9113). The IASB Addition (the proposed development) is a 10-storey addition to the approved ASB and comprises a gross floor area of approximately 5,000 m^2, which equates to an approximate increase of 10% to the approved ASB. It comprises the following core elements:

- UNSW Eastern Extension (excluding internal fit-out)
- Associated modifications within the approved ASB
- Lowering of Hospital Road
- Landscaping.

The EIS was placed on public exhibition from 29 August 2019 to 26 September 2019. DPIE received nine submissions from Agencies and no submissions from members of the public.

1.2 Report Purpose

The RTS Report has been prepared under Clause 85A of the Environmental Planning and Assessment Regulation (EP&A Regulation) to respond to the comments raised in submissions received by the DPIE during the public exhibition period and to DPIE's preliminary assessment of the SSDA.

1.3 Report Structure

The RTS Report is structured as follows:

- Section 2 provides a summary of the submissions received and by whom they were made
- Section 3 provides a comprehensive response to the request for additional information made by DPIE
- Section 4 provides comprehensive responses to each of the comments raised by regulatory agencies
- Section 5 indicates no amended or new mitigation measures are proposed in this RTS Report.

Technical specialists have provided additional expert advice during the preparation of this RTS Report and these are included in the Appendices.

2 Submissions

During the public exhibition of the EIS, DPIE received no submissions from the community and nine submissions from Government Agencies, namely:

- Sydney Water – dated 23 September 2019
- Ausgrid – dated 24 September 2019
- Roads and Maritime (RMS) – dated 24 September 2019
- Transport for NSW (TfNSW) – dated 24 September 2019
- DPIE Environment, Energy and Sciences (EES) Group – dated 25 September 2019
- NSW Environment Protection Authority (EPA) – dated 25 September 2019
- Randwick City Council (Council) – dated 25 September 2019
- Civil Aviation Safety Authority (CASA) – dated 29 August 2019
- Heritage Council of NSW – dated 30 September 2019

3 Response to DPIE Request for Additional Information

Submission	Response
Department of Planning, Industry & Environment	
Opening Magill Street Identify and provide appropriate mitigation to address the additional amenity impacts on properties affected (adjoining Magill Street and Hospital Road) by the opening of Magill Street and the additional through traffic along Magill Street.	**Amenity impacts to Magill Street residences** Health Infrastructure (HI) has undertaken extensive engagement activities with the Magill Street residents and the adjacent community regarding the planning and delivery of the new Prince of Wales Hospital Acute Services Building and proposed additional stages that form the Randwick Health and Education Precinct, including the IASB Addition Proposal. To this end, the project team has a thorough understanding of the project's interface with the adjacent properties, and the local amenity and context of the site. HI is committed to continuing the proactive engagement with the Magill Street residents throughout planning, construction, and opening of new services for all stages of the Randwick Campus Redevelopment. While the desktop studies, fieldwork and associated technical assessment undertaken as part of the application process confirm that the amenity impacts from the reopening of Magill Street are within acceptable limits, special consideration has still been given to identifying and proposing a range of reasonable and practical mitigation measures. These proposed measures are detailed below: • A boom gate will be installed at the end of Magill Street to close access to Hospital Road between 10pm and 7am. The closure period would be signposted at the entry to Magill Street from Botany Street and the Emergency Department (ED) access to stop traffic from travelling towards Hospital Road through Magill Street during this period.

Submission	Response
	• Traffic calming signage to reduce speed of vehicles using the ED access on Magill Street. • Removal of northern curb side parking through a clearway to widen Magill Street for traffic flow and safety. In addition to these proposed measures, HI will also undertake noise monitoring post occupation of the Acute Services Building to validate the findings of the technical assessment of vehicular noise through comparison of actual vs predicted noise levels (SSD9113 Condition E4). Specific noise monitoring will also be offered to each of the property owners on the south of Magill Street so that an individual assessment of the amenity impacts of traffic on Magill Street can be made. This work will be undertaken by an independent expert appointed by HI at its cost and will involve pre and post measurements taken at various locations within the subject properties. The RMS guidance for environmental capacity of minor streets (RMS Guide to Traffic Generating Developments 2002), indicates local streets should have a maximum daily vehicle throughput of 3,000 vehicles per day. The forecast daily traffic volumes along Magill Street (2,500 vehicles per day inclusive of traffic redirected from Hospital Road north) is expected to be less than the 3,000 vehicles per day threshold. As a result, these forecast volumes are deemed to be acceptable given the intended function of Magill Street. HI supports SSD9113 conditions of consent E3-E5 being extended to cover the IASB Addition under this application; and should the process identify noise exceedances above the Operational Noise Criteria, HI will undertake further Architectural Assessment of adjacent residential dwellings located on the south of Magill Street to identify appropriate noise attenuation measures which may be implemented by formal agreement with Magill Street property owners.

Submission	Response
	Benefits of reopening Magill Street As detailed in the *Transport Assessment* prepared by Arup, dated 9 October 2019, a number of measures were considered to reduce the impact of traffic being redirected south as a result of the closure of Hospital Road. All measures, with the exception of reopening Magill Street were deemed unacceptable due to a combination of the following reasons: (1) inability to cater for all vehicle types (size and weight); (2) inefficient/ circuitous travel paths resulting in counterintuitive routes for hospital users; (3) safety concerns for pedestrians; (4) restrictions to emergency vehicle access; and (5) additional delays and deterioration of the broader traffic network. Extensive consultation with Transport for New South Wales (TfNSW), RMS and NSW Ambulance, also confirmed that reopening Magill Street offers an immediate and significant benefit to the local traffic network by improving the performance of key intersections along Barker Street and High Street, and improving access for emergency vehicles. The traffic modelling and supporting consultation has also confirmed that the traffic volumes on the Magill Street as a result of the IASB Addition Proposal would be well within the limits prescribed by RMS for a local road. To further support the broader precinct planning, HI has already developed and commenced implementation of a Travel Demand Management Strategy (TDMS) and comprehensive Green Travel Plan (GTP). The TDMS and GTP have been developed by the Precinct in collaboration with the Sydney Coordination Office and RMS within TfNSW, Randwick City Council and with all stakeholders within the Randwick Health and Education Precinct.

Submission	Response
	Community and Stakeholder Feedback There was significant stakeholder and broader community concern regarding the potential diversion of traffic onto Barker Street as a result of closing Hospital Road. The opening of Magill Street was supported by TfNSW and NSW Ambulance as the most preferred mitigation measure to easing local traffic congestion, as detailed in the IASB Addition Consultation Report, (Appendix X1 to the IASB Addition EIS). Magill Street residents support the removal of northern curb side parking to improve traffic flow and safety when Magill Street is opened. Engagement with local schools did not raise objections to the opening of Magill Street.
Storage and Handling of Dangerous Goods Identify and clarify whether the storage and handling of dangerous goods in the proposed development is below threshold quantities in the Department's Applying SEPP 33 and provide a preliminary risk screening in relation to the storage and handling of dangerous goods for this proposal in accordance with State Environmental Planning Policy No 33-Hazardous and Offensive Development, if required.	Safety Engineering & Technical Services Pty Ltd (SETS) has advised that provided that the UNSW limit the scale of the storage of dangerous goods as described in Table 1 & 2, a consequence of being neither potentially hazardous nor potentially offensive industry, is that SEPP 33 would not apply to the proposed co-joined activity at the ASB (Appendix F).
Privacy Reconsider the use of obscuring film to minimise privacy impacts on Ainsworth House.	Window positions have been adjusted to relocate windows away from openings to the Ainsworth Building, and to respond to developed internal planning within the IASB Addition. An aluminium fin is provided to each opening on the east façade to help limit views from the proposed IASB Addition to the existing Sydney Children's Hospital (SCH) and Royal Hospital for Women (RHW) buildings on the opposite side of Hospital Road, and to reduce the perception of window openings when the IASB Addition is viewed from these buildings. To mitigate the requirement for obscuring film, two fin types are proposed: • 400mm deep fins, projecting at 90 degrees to the façade. Fin depth has been increased

Submission	Response
	by 100mm when compared to the original submission to further restrict sightlines. • Fins that are approximately 500mm deep and angled at 45 degrees to the façade to frame views away from the Ainsworth Building and other neighbouring buildings. Both fin types are used across the east façade. Angled fins have been positioned specifically in relation to windows, balconies and terraces to neighbouring buildings.
Art and Aboriginal Heritage Consider integrating public art on the façade of the link bridge, including interpretative elements which recognise the significance of indigenous culture and heritage on the site.	The delivery of health services and facilities is greatly enhanced by ensuring the Arts is built-in and becomes a core part of healthcare services and facilities. The Arts in Health approach at Prince of Wales Hospital focuses on improving health outcomes. Stakeholders, staff and local communities have been consulted throughout the project's development, providing wide-ranging input that has informed the Arts and Culture Strategy. Dominant themes through this consultation include a prominent recognition of Aboriginal history and culture through the fabric of the building. This is highlighted in the attached Arts in Health Fact Sheet (Appendix K). Since the Precinct was announced in 2017, the project team have been working closely with the La Perouse Local Aboriginal Land Council and the local Aboriginal community on how the community's significant continued connection to country and rich cultural heritage can be recognised in the new Acute Services Building design. A large-scale Aboriginal garden is being developed for the main entry to the Acute Services Building, that will incorporate a storytelling experience as you enter into the hospital grounds from Botany Street. With a focus on bush medicine, family and fishing themes, the centrepieces of the garden are the Hearth uncovered on site during excavations in 2018 and the artwork 'Buriburi', which has been created through a partnership between the Randwick Campus Redevelopment, La Perouse Local Aboriginal Land Council, Gujaga Foundation and La Perouse Youth Haven.

Submission	Response
	The holistic Arts and Culture strategy that has been developed as part of The Project, will inform the IASB Addition. Multiple artworks sites across the IASB internal and external public domain have already been identified. Following consultation with Ainsworth services, Sydney Children's Hospitals Network and the Ainsworth School, it has been determined that a participatory artwork will be designed in partnership with Ainsworth Building consumers for integration onto the link bridge.
Façade Provide further articulation of the façade to develop the desired outcomes of colour, texture, playfulness, framing of views and the relationship to the Ainsworth Building.	The original submission included aluminum sheet solid panels to the curtain wall façade. The updated proposal replaces the aluminum sheet with ceramic tiles of various sizes in an irregular pattern. The selected tiles have an inherent natural variation in both colour and texture. Staggered curtain wall joints further enhance textural variation. As well as mitigating issues of overlooking, the aluminum fins provide depth and relief, creating a shifting pattern of shadows over the course of the day. The irregular placement of windows combined with variation to both the depth and angle of the fins generates a sense of playfulness.
Internal spaces Organise the internal spaces on Level 0 adjacent to the public plaza to activate the public space and provide views into the operations of the building.	Spaces within the IASB Addition footprint located on the Level 00 public deck will be developed as part of future fit-out works. It is envisaged that this area will provide an entry to the facility, and house public-facing functions supported by an activity-based workspace and meeting rooms. A predominately glazed façade will provide visibility into these areas and activation for the shared forecourt zone to the north. Section 5 of the updated Architectural Design Statement (Appendix A) provides additional detail.

4 Response to Submissions

4.1 Re-opening Magill Street

Submission	Response
Randwick City Council	
Magill Street access Council reiterates its position that Magill Street should not be reopened to through traffic in order to protect the amenity of the residential dwellings on its western frontage. This position was outlined in Council's submission to the ASB (SSD-9113), as conditioned on the determination for the ASB (SSD-9113) and outlined in Council's submission on the draft SEARs for the proposed addition to the approved ASB (SSD-10339). Emergency, bike and pedestrian access is to remain, as per the conditioning of SSD-9113.	See response to DPIE in Section 3.

4.2 Traffic and transport

Submission	Response
Randwick City Council	
Transport, cycling and accessibility <u>Pedestrian access</u> Additional plans and information is required to show how north-south pedestrian access will be maintained along Hospital Road. It is noted in the Precinct Master Plan Structure Plan (pg. 13 of Design Statement) that there is continual access specified along Hospital Road. It is recommended that this be maintained at all times. As a result of this proposal, pedestrian access between the north and south of Hospital Road is only available via a narrow staircase. This raises Disability Discrimination Act (DDA) compliance issues which are particularly pertinent given the nature of this development as a public hospital. Council requests that further information is provided to specify how DDA compliance will be achieved.	Footpaths to Hospital Road, south of the ASB will be retained for staff circulation. The main public accessible route to the ASB from the south will be along Magill Street and via the Emergency Department lifts to Levels -01 and 00. Appropriate way finding will be provided to clearly indicate this route. The primary function of Hospital Road is it's use as a private access to Back of House (BOH) functions for the hospital, carpark and specialist organisations along the southern end of the road. Hospital Road is not intended to be a pedestrian thoroughfare and the dominant use is for service vehicles and ambulances. Safety benefits will be realized by deterring pedestrians from using Hospital Road, where multiple vehicle accesses are located. The function of Hospital Road as a BOH deems it to be exempt under D3.4 as it is inappropriate for

Submission	Response
	use by a person in a mobility. Refer to the updated Accessibility Design Review (Appendix C).
Cycleway and footpath Council notes that there will be more concentrated vehicle movements as a result of the closure of Hospital Road. Vehicles previously travelled north-south along the length of Hospital Road but as a result of its closure, more traffic will come in and out at the Barker Street entrance. It is Council's position that mode separation is therefore needed in the form of a separated cycleway along Hospital Road between Magill Street and Barker Street (2.5m wide plus buffer) as well as a continuous footpath. As stated in the traffic report prepared by Arup at Appendix I, walking as a transport mode for staff is highly utilised and there is an excellent opportunity to promote cycling as a mode of transport for staff due to the high number that live within reasonable cycling distances. The provision of a separated cycleway and continuous footpath along Hospital Road between Barker and Magill Street could work to achieve this.	Cyclists will access the Campus bicycle hub along the on-road cycleway for Magill Street and southern section of Hospital Road. The southern half of Hospital Road will continue to function as a shared vehicle and bicycle street with a slow vehicle speed for service and logistics vehicles suitable for bicycle use.
Wayfinding Council recommends that pedestrian and cycling wayfinding signage is provided. In particular, wayfinding signage is critical at the north-east corner of the ASB site at the Level 00 primary pedestrian connection in order to ensure that clear disabled access is provided north to south.	HI supports pedestrian and cycling wayfinding signage where required. Signage will be developed as part of future fit-out works. The signage types and locations will be integrated with the IASB Addition and ASB. External and internal accessible routes will be clearly identified.
End of trip facilities Council notes that end of trip facilities are not provided as part of this proposal. In line with NSW Health's commitment to 8% mode shift away from private vehicle use, Council reiterates that high quality end of trip facilities are necessary to support this projected modal shift. Council expects that end of trip facilities are provided in future hospital redevelopment stages and NSW Health meets this commitment to modal shift.	UNSW staff utilising the IASB Addition will park in the allocated bike spaces on UNSW campus. UNSW has increased bike spaces across the campus by 14% between 2018 and 2019. This included installation of 100 new bicycle racks, replacement of 150 non-compliant racks, 3 new repair stations and 39 new spaces within UNSW's first secure bike facility at the UNSW Barker St carpark. Therefore, an end of trip (EOT) facility has not been provided as part of the IASB Addition, as the bike users will be primarily UNSW staff.

Submission	Response
	An expanded EOT facility has been designed for the broader Randwick Campus (see "Campus Design" in Appendix G). The approved ASB will see the delivery of Stage 1 of this design with further construction of expanded EOT facilities subject to additional funding being received as part of future Campus projects and redevelopments. The current ASB design (see "Base Design" in Appendix G) includes provision for 50 staff and 20 visitor bicycle parking spaces, which is compliant with SSD 9113 Condition B63a. The Base Design has been endorsed by the user group with construction to start in 2020.
Short term bicycle parking It is also noted that a bicycle parking hub is not provided within this proposal or the approved ASB (SSD-9113) but within the existing hospital campus. Council considers that relying on surrounding campus areas for bicycle parking is a poor outcome given the reliance on sustainable travel modes (public and active transport) for access to the proposed development, and in particular the committed 8% mode shift away from private vehicle use. Further, an increase of 5,000sqm of floor space will result in greater demand for bicycle parking. As such, Council recommends that high quality short-term bicycle parking is provided in multiple locations across the ASB site.	As noted above, the ASB will provide an additional 50 staff and 20 visitor bicycle parking spaces for ASB staff, in accordance with SSD 9113 Condition B63a. Further, UNSW has increased the number of bike spaces on the UNSW campus by 14%, as detailed in the above response. The provision of additional bike parking spaces and facilities on the ASB and UNSW will support the mode shift away from single person private vehicle use.
Roads and Maritime Services (TfNSW RMS)	
Lowering of Hospital Road The lowering of Hospital Road and closure of Hospital Road from Barker Street to High Street will have an impact on existing traffic distribution on the surrounding transport network. Roads and Maritime has reviewed the submitted Transport Impact Assessment (TIA) and notes an increase in trip distribution to McGill Street and Botany Street. As such, Roads and Maritime requests that the applicant continues to engage with the transport cluster to identify measures to	HI meets regularly with the Sydney Coordination Office (SCO), TfNSW, RMS, Transport Management Centre (TMC), Sydney Light Rail (SLR) and the Council to identify suitable measures to mitigate any impacts to the surrounding network. Topics which have been discussed during meetings include coordination of haulage routes, gate access, interface with Light Rail and out of hours scheduling. The Construction Pedestrian and Traffic Management Sub-plan (CPTMP) is being prepared in consultation with the transport cluster.

Submission	Response
mitigate any impacts to the surrounding network.	The lowering of Hospital Road will continue to be included as a standing agenda item for these meetings.
Bicycle and end-of-trip facility TIA states within Section 3.4 that "A new bicycle parking and end of trip facility is being planned for on campus which is part of approved SSD9113. This will be available for IASB Addition staff". To ensure that sufficient bicycle parking provision is across the campus, within the Response to Submissions, the proponent should detail the number of bicycle parking spaces and facilities to be provided across the campus, to ensure that the campus has sufficient facilities to support and encourage active transport.	Refer to previous responses on the subject of EOT facilities and additional bicycle parking provided across the Hospitals Campus UNSW Kensington Campus.
Pedestrian safety The proposed development will generate additional pedestrian movements in the area. Pedestrian safety is to be considered in the vicinity.	Pedestrian safety has been strongly considered and addressed through the architectural treatment of the ASB and IASB Addition, which includes designated linkways, pedestrian crossings, improved campus wayfinding and legible and intuitive wayfinding. During construction, the pedestrian access along streets in the vicinity of the proposed development will be staged appropriately to ensure pedestrian safety (Appendix H). During operation, as previously stated, Hospital Road's function as a private road access for BOH hospital functions and carpark intends for the road not to be used by pedestrians, and primarily for vehicles. Wayfinding and signage will be implemented to reflect this.
Road Occupancy Licence (ROL) A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on High Street during construction activities.	Noted. HI will obtain a ROL from TMC for any works that may impact on traffic flows on High Street prior to works being undertaken.
Vehicle movements All demolition and construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping. A	Noted. Vehicle movements and haulage routes during construction have been detailed in Appendix I.

Submission	Response
construction zone will not be permitted on High Street.	
Construction Pedestrian Traffic Management Plan A Construction Pedestrian Traffic Management Plan (CPTMP) shall be submitted in consultation with the TfNSW Sydney Coordination Office (SCO), Roads and Maritime, and Randwick City Council, prior to the issue of a Construction Certificate. The CPTMP needs to include, but not be limited to, the following: construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control.	A Traffic and Pedestrian Management Sub-plan will be prepared as an appendix to the Construction Management Plan (CMP) prior to construction being undertaken. The plan will be developed in collaboration with TfNSW, SCO, RMS and Council.
Transport for NSW (TfNSW)	
Sydney Light Rail Operation and Infrastructure <u>Comment</u> The proposed development would have the potential to impact on the Sydney Light Rail operation, infrastructure and the completion of the Sydney Light Rail Project's program of works due to the following: • Flooding - The Environmental Impact Assessment prepared to support the development states that the development site is affected by overland flooding. It is advised that the subject development has the potential to impact surrounding land/ activities, including the Sydney Light Rail Project, by contributing to additional flooding during construction and operation; and • Closure of Hospital Road at High Street and the proposed excavation of Hospital Road – Excavation and construction activities would have the potential to impact on the operation of the light rail, or its assets and accessibility including the health and safety of passengers. <u>Recommendation</u>	Extensive consultation through regular meetings between HI and Sydney Light Rail (SLR) is already underway. HI is committed to undertaking any further assessments needed to satisfy/address issues identified prior to works being undertaken. This will be undertaken in consultation with the SLR operator. As a result of the extensive consultation through regular meetings, TfNSW have both expressed their support for the closure of Hospital Road to through-traffic to the north and the reopening of Magill Street to help alleviate existing local traffic congestion and improve traffic performance, particularly along Barker Street.

Submission	Response
It is requested that the applicant consults with the Sydney Light Rail operator and undertakes an assessment of the above issues and propose any required mitigation measures in consultation with the Sydney Light Rail operator as part of the response to submissions.	
Impacts on Transport Network Operation Comment The development proposal includes the following: • Hospital Road - Lowering of an 80 m section of the private service road known as Hospital Road by up to 4 m and closure of that private road from its intersection with Barker Street and High Street, save for maintaining vehicular access to the loading dock and staff car park off Barker Street; and • Magill Street - Open Magill Street to improve traffic network flow around the construction site. Recommendation It is advised that the applicant continue to consult with Roads and Maritime Services and the Sydney Coordination Office within TfNSW to identify measures to mitigate any impacts to the surrounding network.	HI engages extensively through regular meetings with the SCO, TfNSW and RMS to identify issues and address/resolve them as they arise. Regular consultation with the community has indicated that the diversion of vehicles onto Barker Street is a concern as a solution to manage the change in traffic conditions resulting from Hospital Road closure. The re-opening of Magill Street has been supported by SCO, TfNSW and RMS as a mitigation measure to ease local traffic congestion on Barker Street.
Construction Worker Transportation Strategy Comment The applicant's proposal to minimise construction workers driving to the precinct and parking is supported as the Construction Management Plan prepared to support the development states the following: • The applicant recognises that a dedicated worker and transportation strategy needs to be implemented; • Construction workers would be encouraged to adopt a Green Travel Plan for this project with use of public transport	A Construction Worker Transportation Strategy (CWTS) has been prepared in accordance with SSD 9113 Conditions of Approval for the ASB. The CWTS will be updated to support construction of the IASB Addition in consultation with the SCO.

Submission	Response
to reduce the amount of light vehicles on the road and to ease congestion around the Randwick Precinct; and • The applicant will establish a "park and ride" and associated shuttle bus service. Recommendation It is advised that the applicant be conditioned to prepare a Construction Worker Transportation Strategy in consultation with the Sydney Coordination Office within TfNSW.	
Construction Pedestrian and Traffic Management Comment Several construction projects, including the Sydney Light Rail Project, University of New South Wales, the Newmarket Green Development and surrounding new residential developments will likely occur at the same time as this development within the Randwick Precinct. The cumulative increase in construction vehicle movements from these projects could have the potential to impact on general traffic and bus operations within the Randwick Precinct, as well as the safety of pedestrians and cyclists particularly during commuter peak periods. Further, TfNSW advises that the use of High Street by the development's construction vehicles should be avoided to ensure that the interface risk between construction vehicles and the Sydney Light Rail and buses is mitigated. Recommendation It is requested that the applicant be conditioned to: • Prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office within TfNSW, Roads & Maritime Services, the Sydney Light Rail operator; and • Consult with TfNSW, Roads and Maritime Services and the light rail operator at	A Traffic and Pedestrian Management Sub-plan will be prepared as an appendix to the CMP prior to construction being undertaken. The plan will be developed in collaboration with TfNSW, SCO, RMS and Council.

Submission	Response
Traffic and Transport Construction Coordination meetings during construction.	
Travel Demand Management Strategy and Green Travel Plan Comment The Green Travel Plan prepared to support the development application includes potential travel mode share shifts for car (driver and passenger), public transport, walking and cycling. It is advised that preliminary discussions have commenced with the health and education institutions within the Randwick Health and Education Precinct for the approved Acute Services Building (SSD 9113) to support their development of strategies to reduce the proportion of single- occupant car travel and increase the mode share of public transport and active transport within the precinct. Recommendation It is requested that the applicant be conditioned to revise the Travel Demand Management Strategy and Green Travel Plan in consultation with the Sydney Coordination Office within TfNSW and all stakeholders within the Randwick Health and Education Precinct.	Consultation has commenced and the Traffic Demand Management Strategy and Green Travel Plan will be updated to take account of the IASB Addition. Consultation with TFNSW, SCO and precinct partners is occurring and will continue. The GTP is a comprehensive plan that has been developed to promote green travel choices across all organisations at the Randwick Hospitals Campus.

4.3 Biodiversity

Submission	Response
DPIE Environment, Energy and Sciences Group	
Biodiversity The submitted BDAR states that seven (7) native trees and three (3) exotic trees are to be removed and it is noted that these trees have been planted, but have nevertheless been assessed in accordance with the BAM and EES interpretation of the BAM and attributed to a	No existing building(s) are to be demolished for the extension and the construction of the proposed development is not likely to provide important shelter/roost for microbats. In observing the precautionary principal, HI or its contractors should engage appropriately licensed and qualified fauna Ecologists to search the 10 trees prior to their removal, in order to confirm the absence of native fauna, such as

Submission	Response
PCT. The vegetation integrity score of this PCT was low enough as to not warrant an offset. Unfortunately, is not clear from either the EIS or BDAR that no existing buildings are to be demolished for this extension / addition. However, please note that if existing buildings are to be demolished, either fully or partly, or if construction of new buildings is close to existing buildings, they should be assessed and searched for their potential as roosting habitat for microbat species, including for the vulnerable species Large Bent-winged bat *Miniopterus orianae oceanensis* and Yellow-bellied Sheathtail Bat *Saccolaimus flaviventris* which are known to use buildings and other human-made structures for roosting. A search and assessment for these species was not reported in the BDAR. If the Department determines to grant approval, EES recommends that the following be inserted as a condition of consent: • Revegetation/replacement of street trees should be to: a. maximise diversity of trees, shrubs and groundcovers of locally indigenous provenance species, using a mix of species from the majority of plant families that are found in naturally occurring examples of the vegetation community that is most likely to have occurred on the site; and b. compensate for loss of foraging habitat of Grey-headed Flying-fox *Pteropus poliocephalus*.	microbats. If they are found, the Ecologist will capture, treat and relocate such microbats to a suitable location (Appendix J).

4.4 Aboriginal and non-Indigenous Heritage

Submission	Response
DPIE Environment, Energy and Sciences Group	
Aboriginal Heritage If the Department determines to grant approval, EES recommends that any conditions recommended by the Aboriginal Cultural	Agreed. The IASB Addition Aboriginal Heritage Assessment has identified that there is a low likelihood of buried undisturbed/intact cultural remains within the Hospital Road section that is proposed to be lowered, which has been subject

Submission	Response
Heritage Assessment report prepared by Mary Dallas Consulting Archaeologists dated October 2018 be included as conditions of consent.	to many inground infrastructure services. Archaeological monitoring of the civil excavation of Hospital Road and Delivery Drive will be provided. If there is an unexpected archaeological find uncovered, the relevant methodology from the Aboriginal Cultural Heritage Management Plan (Appendix E) will be undertaken.
Heritage Council NSW	
European Heritage The Archaeological Assessment prepared by Casey and Lowe has not demonstrated there are archaeological 'relics' with research potential within the meaning of the Heritage Act 1977 and the Heritage Council□s current guidelines. An archaeological program is not recommended for this SSDA and no conditions of consent are included with this letter. The project can be adequately managed through an unexpected finds procedure within the remit of a Construction Environmental Management Plan (CEMP).	Noted.

4.5 Landscaping

Submission	Response
Randwick City Council	
Landscaping Council notes the Landscape Design Report prepared by ASPECT Studios at Appendix E. As planting incorporating feature canopy trees has been shown at the Level 00 primary pedestrian connection from the north, further details must be provided to confirm that both sufficient soil depth and volume will be provided to sustain the trees for their life term. Further to this, Council requests that the Landscape Design Report is amended to include the following information: • A planting plan and plant schedule that includes proposed species, botanic and common names, pot size at time of planting,	Section 5.0 of the updated Landscape Design Report (Appendix D) provides the following information as requested by Council: • Soil depths and volumes • Planting plan and plant schedule • Plant origin percentage schedule • Quantity of trees in Hospital Road works The lighting strategy for paths and gardens will be developed as part of the design development process. Wayfinding, surveillance and security considerations will inform this strategy.

Submission	Response
quantity, location, dimensions at maturity and any other details required to fully describe the works; • A schedule showing the number (as a percentage of total) the endemic, native and exotic species that will be used in all new planting; • A schedule showing the number of new canopy trees to be planted compared to the number of trees to be removed; • Lighting strategy for paths and gardens to assist with wayfinding and surveillance/security.	
Council raises concern about the cumulative loss of trees on the campus site. The proposal requires 7 native trees and 3 native trees to be removed. It is noted that Health Infrastructure is committed to planting trees on the campus as part of the overall Randwick Campus Redevelopment Project, however Council reiterates that there must be no net loss of tree canopy within the campus.	13 trees will be removed as part of Hospital Road works. 13 new trees are proposed in the new space between the IASB and Ainsworth Building. The updated Landscape Design Report provides further detail.

4.6 Discharges (Air, Noise, Waste and Water)

Submission	Response
EPA	
Noise - operational The 10339 report indicates that the general traffic noise level associated with SSD 10339 will not differ from the predicted noise levels presented within the 9113 report and has therefore not been further evaluated by the EPA. However, the EPA has identified other issues with the 10339 report that may warrant more discussion: • The 10339 report contains information relating to the control of mechanical plant noise emission from the proposed IASB development. As mechanical plant selections have not yet been made, the advice is conceptual only and is provided to enable	Noted. HI is committed to undertaking any further assessment needed to ensure noise emissions are within predefined limits. Further, HI is committed to ensuring that the cumulative noise limits for all mechanical plants (ASB and IASB Addition) will comply with predefined noise limits.

Submission	Response
future compliance with the noise limits set within 9113 report. The EPA advises that, given the scope of the mechanical plant associated with 10339, when considered in addition to the plant that forms part of SSD 9113, it is likely to require detailed acoustic design and significant remediation to enable compliance with the noise limits in SSD 9113. (Note: Table 4 of Section 5.2.1.1.1 of the 10339 report mirrors the SSD 9113 requirements). • Presently, allowance has been made for "acoustic louvres and attenuation" for the chillers, fans and compressors included within SSD 10339. The EPA advises that these units (i.e. all mechanical plant approved under SSD 9113 and if approved SSD10339) must comply cumulatively with the noise limits applied in the SSD 9113 approval, and SSD 10339 should include a condition to require this.	
Noise – Construction In addition to the noise emission from the operation of the development, the 10339 report addresses noise and vibration impacts associated with the construction of the IASB. The 10339 report states the following within section 9: *"Construction Noise* *Proposed construction hours for the Project are as follows:* *- Monday to Friday – 7:00am to 6:00pm.* *- Saturday – 8:00am to 5:00pm.* *- Sunday and Public Holidays – No works.* *In addition to the regular working hours above, forty weekends of works will be required over 18 months to ensure operational continuity of the loading dock during core working hours during the week. These works are to take place during those weekends between:* *- Friday – 6:00pm to 10:00pm* *- Saturday and Sunday – 8:00am to 10:00pm."*	HI is committed to ensuring that all reasonable and feasible mitigation measures are in place to minimise noise levels from construction works Without the closure of the existing loading dock during construction, either fully or partially, the construction of the IASB Addition cannot proceed. The items below further justify the requirement for closures: • The loading dock driveway and part of Hospital Road is required to be lowered up to 7m. During various stages of this work, full closures are required to carry out activities such as services diversions, shoring retention piling and bulk excavation. These activities have several hours of preparation time required to carry out productive tasks. Continuity to complete key tasks is required to make construction progress. • Demolition activities to the existing buildings to connect link bridges will require closures to the loading dock to facilitate safe exclusion zones, use of plant, construction

Submission	Response
On face value, the construction of the IASB could impede the operational integrity of the loading dock and potentially compromise hospital functions, and therefore is likely a valid consideration for out of standard hours works. However, additional and specific justification from the proponent should be sought to support this position. More importantly though, development consent (SSD 9113) does not include any outside of standard hours protocol or approval pathway for out of standard hours works. Should consent be granted for out of hours construction work, the EPA recommends that the approval include a requirement for DPIE assessment and approval (perhaps via an out of standard hours works protocol or Construction Noise and Vibration Impact Statement) for out of standard hours construction to ensure that the recommendations for out of hours noise reduction as per section 8 of the 10339 report are applied at detailed design stage.	transport manoeuvrability and heavy equipment placement. • To mitigate works at height, the link bridges are being designed to be prefabricated off-site, delivered in sections and then lifted into position by mobile cranage. Whilst this process is the most efficient, the set-up time to position mobile cranes and execute these lifts cannot be performed in a standard working day shift and require consecutive shifts to perform these works. Further to this, the required working space to carry out these works will close the loading dock in its entirety. • The IASB Addition is positioned over the entrance of the loading dock. To construct the building, an overhead gantry system is required to be installed to provide access for loading dock vehicles in and out of the dock. To install this gantry system, the dock is required to be closed, along with other high-risk construction elements of the IASB Addition. It is essential for the dock to be closed during installation to ensure full separation of pedestrians and operational logistics from high risk works. Assessing all the above key construction items, weekend closures and extended working hours were the only viable option to mitigate impact on the services and business functions of the Hospitals Campus. Through consultation with the hospital stakeholders, business continuity can be maintained with weekend closures to the loading dock, noting that some adjustments to internal operations are necessary to facilitate this. The Hospital stakeholders have advised that mid-week closures cannot be accommodated as business operations would be too adversely impacted. The weekend activities nominated have been indicatively identified on the time motion study. It is prudent to note that these nominated weekend dates are subject to change during the construction program. Weather, key hospital events, technical matters, consideration of

Submission	Response
	nearby services and residents, and conditions outside of our control will determine which weekends are activated. Hence requirements such as ongoing requests for weekends is not a viable option and is why the nominated hours have been requested. The project team continue to be cognisant of the hours nominated. Without these working hours and conditions nominated, alternative construction staging and methodologies have been assessed as not viable. Suitable mitigation measures will be set out in a Construction Noise and Vibration Management Plan (CNVMP) prepared by the Contractor at the detailed design stage. The CNVMP is to reference the proposed plant equipment and construction methodology, incorporating the matters referred to in Section 8.4.1 and Section 8.4.4 of the Noise and Vibration Impact Assessment (NVIA) prepared by Acoustic Studio (2019) and referenced as Appendix G to the EIS for SSDA 10339.
Waste, Water, Air Quality The consent conditions should ensure that the development complies with standard requirements regarding waste management, water management (preventing run-off and subsequent pollution of waters) and appropriate site management to minimise air quality impacts, particularly dust.	Noted. The following plans have been prepared to detail the mitigation measures and procedures to be undertaken during construction for environmental compliance: • Waste Management Sub-plan • Integrated Water Management Sub-plan • Air Quality Management Sub-plan.

4.7 Flooding

Submission	Response
DPIE Environment, Energy and Sciences Group	
Flooding If the Department determines to grant approval EES recommends, though the proponent is not required to provide compensatory measures to mitigate the impacts of the project in events rarer than the design event (1% AEP), that the	The results of flood modelling, including the modelling of the PMF event, were discussed with Council. Council was supplied with modelling files and the supporting BMT Flood Report. As noted in the query, there is no requirement to mitigate flooding beyond the 1% AEP event. For the 1% AEP event, the development achieves the

Submission	Response
impact of the project on flood damages and emergency management planning should be assessed and consultation should occur with property owners and relevant councils in the early stage of the planning. This is recommended because Randwick Campus Redevelopment POW Hospital Road Lowering Flood Modelling (BMT, December 2018) shows significant increases in flood level of the PMF on some properties in High Street and Blenheim Street.	required non-worsening with respect to flooding and therefore satisfies the relevant Council Development Control Plan. While there is an increase in level associated with the PMF, it is important to note that the inundation is associated with relatively short duration rainfall and the flooding shown in the report will be for a relatively short duration. Further, a review of the properties on High Street and Blenheim Street indicated that the properties are units, with garages already affected by the PMF set at ground level. Residential areas are all at the first level and have improved immunity to flooding.

4.8 Contaminated lands

Submission	Response
EPA	
Contaminated Lands Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with SEPP55: The detailed site investigation report prepared by Douglas Partners (Appendix S, pp.5-379 of 474) assessed the soil and groundwater contamination. The report stated that the site can be made suitable for the proposed development subject to the revised Remediation Action Plan (RAP) that was submitted also as part of Appendix S of this EIS report (pp.380-474). It is considered that the EIS complied with this SEAR item. Undertake a hazardous materials survey of all existing structures and infrastructure prior to any demolition or site preparation works: The Douglas Partners report referred to the Hazardous Materials Audit report dated 11 December 2018 which was not provided as part of this EIS. However, the RAP included a description of the hazardous materials survey (section 5.8) and Section 10.1 discussed the	Noted. HI is committed to undertaking a site audit and providing a Section A Site Audit Statement to certify that the site has been made suitable for the proposed development.

Submission	Response
management of hazardous building materials. As such the EIS complied with this SEAR item. Note: The EPA does not make a conclusion on the suitability of the site for the proposed development. Site auditors can provide increased certainty to planning authorities of the suitability of a site for a specific use. Therefore, the EPA recommends inclusion of a development consent condition that requires the proponent to submit a Section A Site Audit Statement that certifies that the site has been made suitable for the proposed development.	

4.9 Sustainability

Submission	Response
Randwick City Council	
Sustainability Council notes that the NSW Government Resource Efficiency Policy (GREP) prepared by the NSW Office of Environment and Heritage (2019) applies to all general government sector agencies and sets minimum standards for energy, water and air emissions. The policy aims to ensure that NSW Government agencies provide leadership in resource productivity and Council requests that Health Infrastructure consider this policy as part of its design, fit out and ongoing operation.	HI is committed resource efficiency and will consider the policies outlined in the GREP during design development, fit-out and ongoing operation.
Council has reviewed the Sustainability Report prepared by Lehr Consultants International (LCI) provided in Appendix J of the EIS and provide the following comments: • Council notes that the sustainability report for the IASB building uses a 4-star equivalent Green Star rating. Council recommends that the development should achieve a 5-star Green Star rating at a minimum to reflect Australian excellence as a state-of-the-art healthcare facility.	The IASB Addition has been designed to achieve a high level of sustainability performance consistent with the approved ASB, whilst also meeting the minimum performance standards of the National Construction Code 2016 (NCC 2016): Building Code of Australia (BCA) Section J and the Randwick Development Control Plan 2013. Under the ASB (SSD-9113), the Contractor must achieve and obtain certification for minimum 4 star Green Star rating (or alternative certification regime in relation to updated NSW Health Engineering Services Guidelines if approved by

Submission	Response
	the Planning Secretary) consistent with the SSDA Condition of Consent (D40). HI is in the final stages of developing its own Ecologically Sustainable Development (ESD) evaluation tool in consultation with Steensen Varming and Arup. DPIE has been engaged in the process and is in general agreement with HI's approach. The ESD rating of the ASB and IASB Addition will be evaluated based on this alternative rating scheme if approved by the Planning Secretary. An independent ESD consultant will be engaged to support achieving the requirements prescribed by the tool.
Council understands that the proposed development has exposed areas that are suitable for the installation of solar panels yet no solar panels are proposed for the development. Council recommends that solar panels should be installed in line with the GREP to offset the electricity requirements for the development.	The IASB Addition is an extension of the approved ASB building and therefore an extension of the ASB services solution which does not include solar panels.

4.10 Other

Submission	Response
Randwick City Council	
Insufficient plans Council note that the plans provided are unclear and incomplete, particularly in relation to the distance and setback of the proposed addition from other site boundaries and surrounding streets. As such, Council is unable to make a sufficient assessment of the proposal.	Additional plans on the set back dimensions to the north and south have been included in the updated Architectural Design Statement (Appendix A).
Ausgrid	
Utilities - Electrical Ausgrid has reviewed SSD – 10399 and particular Appendix T. Ausgrid notes that there are two distribution substations (S.78769 & S.78770) proposed to be positioned within or adjacent to the site. As such the proponent must ensure that adequate fire segregation requirements are	Noted. HI is committed to ensuring that adequate fire segregation requirements are maintained as per Ausgrid's Network Standard 141 and any Ausgrid easements, leases and/or right of ways will be maintained at all time to ensure 24-hour access.

Submission	Response
maintained as per Ausgrid's Network Standard 141 and any Ausgrid easements, leases and/or right of ways must be maintained at all times to ensure 24 hour access. For further details with regard to easements and right of ways please refer to Ausgrid's Network Standard 143.	
Sydney Water	
Sydney Water Requirements • Sydney Water have no objections to the proposed expansion. • The appointed Water Servicing Coordinator (WSC) will be required to provide an overall servicing strategy proposal as part of any future application.	Noted. HI will engage a WSC as required for the project.
CASA	
Airspace CASA has no objections to the IASB Addition and the previous CASA assessment of November 2018 for the Approved Acute Services Building could apply to the Approved Acute Services Building plus the IASB Addition.	Noted.

5 Conclusion

A key focus following the lodgement of the EIS was resolution of the eastern façade elevation, including resolution of SCHN and RHW privacy and outlook considerations. Additional design work by the project architect (BVN) to address façade articulation, overlooking and privacy treatments have also been progressed following a meeting with GANSW ON 18 September 2019.

This work included the use of virtual reality simulation to convey realistic impacts to stakeholders and to assist in developing appropriate design responses. The project team has produced an updated façade design and elevations for the IASB Addition addressing feedback from SCHN and RHW and in response to GANSW comments and recommendations. The updated façade design and elevations have been presented to key stakeholders including SCHN, RHW and UNSW in October 2019.

In summary, the following design changes/modifications have been incorporated into the proposal post lodgement of the EIS:

Façade Types: The IASB Addition facade is a variation of the podium curtain wall façade which bounds the ASB central courtyard. This façade introduces a finger grain of 600mm wide window opening, varying from the general ASB curtain wall spacing of 1200mm.

Façade separation: An expressed major joint is provided at each floor level, rather than adopting the main ASB strategy of grouping floors into bands of one, two, three or four levels. Separation at each level enabled maximum flexibility for window placement to limit potential overlooking, and to suit internal functions. Windows have also been positioned away from the openings to the Ainsworth Building to respond to overlooking concerns and also to respond to internal planning within the IASB Addition.

Fins: Aluminium fins are provided to openings on the IASB Addition façade to limit views from the IASB Addition to the existing SCHN buildings (including Ainsworth Building) and RHW buildings on the opposite side of Hospital Road, and to reduce the perception of window openings when the IASB Addition is viewed from these buildings. The aluminium fin depth has been increased by 100mm when compared to the original submission to further restrict sightlines.

As well as mitigating issues of overlooking, the aluminium fins provide depth and relief, creating a shifting pattern of shadows over the course of the day. The irregular placement of windows combined with variation to both the depth and angle of the fins generates a sense of playfulness.

Reflectivity: Reflectivity is minimised by the use of matt finishes and limited areas of glazing.

Materiality: The area of ASB facade to the eastern corridor where the IASB Addition steps back from Level 6 and above has been amended from a light to dark grey solid panel (aluminium or ceramic tile), to help unify the east facade and create a simplified backdrop for the IASB Addition.

The primary solid panel material is a terracotta solid panel (aluminium or ceramic tile), laid in a vertical orientation in a variety of sizes in an irregular pattern. Staggered curtain wall joints further enhance textural variation.

Link bridge: The integration of artwork to the three-storey link bridge will create interest and visual delight both within Hospital Road and when viewed from the SCHN buildings and RHW buildings. Following consultation with SCHN, Ainsworth Services and the Ainsworth School, it has been agreed that a participatory artwork will be designed in partnership with Ainsworth building consumers.

Landscaping/Public domain: The pedestrian plaza design has been further developed to provide greater opportunity for members of staff and the public to utilise its north facing terrace area. A larger,

social space and a series of small private seating areas and greenery are offered to accommodate a variety of uses and improve overall amenity. The RTS Report has been prepared under Clause 85A of the EP&A Regulation to support SSD 10339. It responds to the matters raised by DPIE in its assessment and in submissions by Government Agencies during the public exhibition period.

It is submitted that the conclusions made in Section 11 of the EIS remain valid.

Appendix A
Architectural Design Statement

Advisian

Appendix B
Transport Assessment

Advisian

Appendix C
Accessibility Design Review

Advisian

Appendix D
Landscape Design Report

Appendix E
Aboriginal Cultural Heritage Management Plan

Advisian

Appendix F
Hazardous Chemicals (Dangerous Goods) Matters – Letter of Advice

Appendix G
End of Trip – Current Design

Appendix H
Pedestrian Access Routes

Appendix I
Truck Haulage Routes

Appendix J
Microbat Habitat Letter of Advice

Appendix K
Arts in Health Factsheet – August 2019

Appendix L
Aviation SSDA Update