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a sense of community

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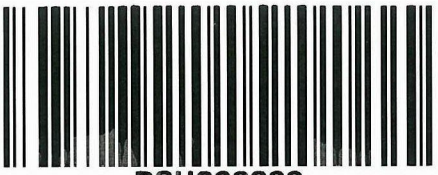

8 April 2011

The A/Director – Government Land and Social Projects
Department of Planning
23-33 Bridge Street
Sydney 2000

Attention : Ms Megan Fu

Dear Madam,

SUBJECT LAND: Lot 1 DP 870720 – Randwick Health Campus – Avoca Street, RANDWICK.
APPLICATION NO: MP10_0131
PROPOSAL: Construction of a Mental Health Intensive Care Unit

I refer to the above applications relating to the construction of a Mental Health Intensive Care Unit (MHICU) at the Prince of Wales Hospital Site. Council raises the following comments to the project :

1. Strategic Planning Comments

The following comments are offered in response to the above major project. Comments in blue text refer to previous comments made in regard to the preliminary Project Application submission for the MHICU in August 2010 (Ref D01085403). Comments based on review of the current proposal (having regard to the earlier previous comments) are in black.

Randwick Education and Health Specialised Centre Discussion Paper
This Paper is being prepared in response to a direction in the Sydney Metropolitan Strategy and draft East Subregional Strategy to prepare a precinct plan for this important strategic Centre. It will inform preparation of Council's comprehensive LEP/DCP, and is due for completion in September 2010. It is recommended that the design development of the PICU project responds to the relevant strategies and principles in this Paper.

Randwick Health Campus Masterplan Principles Review
This document has been endorsed by the SESIAHS area executive, and was prepared concurrently with work undertaken on the above Discussion Paper. It identifies critical issues and principles that underpin the long term development of the campus.

The JBA submission notes the PICU proposal is consistent with the Masterplan Principles Review, however it is considered there are a number of important Principles that remain to be addressed more fully in the design development of this project. The following principles from the Review are recommended as key issues:

- 4.1: Defining campus activities and functional zones
  The PICU is located in the "opportunity zone", the only significant portion of the campus with capacity to accommodate future needs of the campus. The Review emphasises the importance of protecting this area from ad-hoc

decision-making to ensure its long term potential is not compromised. The development of the PICU design should make a detailed consideration of the optimal uses and form of this important site within the opportunity zone and broader campus. Key aspects to consider include:

- The overall objectives for a future mental health precinct in this zone addressing the specific needs of mental health facilities design, and preserving the opportunity for uses/facilities that can activate and address the public domain, especially Avoca Street and Barker Street.
- Compatibility with adjacent (existing and possible future) buildings, including alignment, scale relationships and access requirements
- preservation of the opportunity for future through site links and landscaped connections

Comment : The proposal has been moved from its previous preliminary indicated location, and its location is considered to better address this principle.

- 5.1: Locating strongly connected activities close to each other
  The location of the PICU close to the existing Emergency Department is supported in principle. Consideration should also be given to how this building is intended to relate to a broader future mental health precinct intended in this zone, and how the different circulation and access requirements will be handled safely and effectiviely.

Comment: The location is supported. Access for ambulance and patients are located away from future opportunities for active uses around Avoca Street and Francis Martin Drive, and this is supported.

- 5.2: Separate incompatible categories of movement
  The PICU location is bounded by Francis Martin Drive to the north, which separates it from the existing emergency department and clinical core. This road is used by emergency vehicles as well as pedestrians, cyclists, and staff and service vehicles. The operation, safety and amenity of the movement systems around this development should be clearly assessed and articulated in the development of this design. Any new connection of this road to Avoca Street should be informed by a detailed traffic study.

Comment: No additional vehicular access point is proposed from Avoca Street, and this is considered a positive outcome

- 5.4: Provide strong logic and legibility
  The principle emphasises the importance of clustering related activities, having a clear circulation/orientation system, and designing campus buildings to reinforce/ communicate a sense of legibility and orientation. The design development of this building should respond to its location within the overall circulation hierarchy illustrated in figure 12 of the Review, and respond to identified active edges of Avoca Street and Francis Martin Drive. The opportunity for a future east-west through site link to the south of the PICU (aligned with Hay Street) linking to Avoca Street should be retained.

Comment: The building location seems to provide for a future east-west link to the south of the building, and allow for a future, building to be located to the east, fronting Avoca Street, that can provide a positive, active edge to the streetfront and Francis Martin Drive. The detailed design of the new footpaths and landscaping to the south of the building should prioritise pedestrian travel, avoiding level changes or changes to paving materials at driveway crossovers. It is recommended this footpath be constructed to allow future connection through

to Avoca Street. This means considering appropriate levels, provision for lighting, continuous lines of sight, etc

- 5.5: Provide pleasure, interest and delight
  The design development of this project should address opportunities to create a healing environment, with access to fresh air and open spaces. While this principle may be less crucial for the functional/clinical requirements of this building, it is important to identify a range of future open spaces in the opportunity zone that can contribute to patient and staff well-being, and ensure the PICU allows for this to occur in future.

Comment: No specific locations for future open spaces in the opportunity zone have been indicated, but it is considered that the building footprint can allow for these to be provided with future developments.

- 5.6: Relate to the wider community
  This principle highlights the importance of being a good neighbour, and not planning and designing projects in isolation from their surrounds. While the health funding scenario means projects are delivered on an incremental basis, their collective impact is significant. It is recommended the project be further developed in consideration of the surrounding context and an overall vision for the role and character of the health campus' frontage to Avoca Street. (see also notes under built form below).

Comment: The proposal has been moved from its previous preliminary indicated location, and its location is considered to better address this principle.

- 5.7: Build in flexibility and robustness
  A loose fit approach to design is emphasised, including flexibility to adapt and/or expand facilities as changing needs and funding arrangements permit. It is recommended the PICU design retain the ability for additional floors/floorspace to be added in future.

Comment: The proposal has been moved from its previous preliminary indicated location, and its location means this principle is no longer a key issue.

- 5.8: Provide for personal safety and general security
  It is recommended the PICU optimise opportunities for passive surveillance of the areas around Avoca Street, Francis Martin Drive and links to the emergency department.

Comment: The proposal has been moved from its previous preliminary indicated location, and its location means this principle is no longer a key issue.

Built Form

It is recommended that the design for the PICU is informed by a built form/urban design analysis of the overall campus context, its Avoca Street frontage and the opportunity zone, which sets broad parameters for built form, height, street-front alignment and entry/activation points.
The Discussion Paper noted earlier includes this analysis, and can assist in the development of the design of this project. Without this input, the campus risks further fragmentation, poor legibility and relationship with its surrounds, and sub-optimal use of valuable land.

The state heritage-listed Edmund Blackett Building to the north of this site sets an important height benchmark for Avoca Street. With the fall of land from north to south, and the location of the subject site within an excavated area, it is

suggested this site could successfully contain a higher building than is proposed. (Note recent approval on the health campus for a 7 storey building fronting Barker Street, a concept study for a four storey advanced treatment centre directly to the north of the site, and existing buildings on-campus up to 12 storeys. While not suggesting that any of these building heights are necessarily applicable here, it is important not to extend the variety and inconsistency of heights currently on campus to the Avoca Street frontage/opportunity zone, where the opportunity to provide some coherence still remains.)

While the functional requirements of the PICU are for a 3 storey building, it is recommended the building is designed and constructed to retain the opportunity for additional floor(s) for other purposes that can optimise the use of this valuable site, and contribute to a positive, cohesive presence on the health campus' Avoca Street frontage.

Review of the building alignment along Avoca Street is also important. Opportunities to create a "bookend" at Francis Martin Drive should be investigated, and reference made to the concept study for the adjacent Advanced Treatment Centre in the project's design development.

Comment: The proposal has been moved from its previous preliminary indicated location, and its new location means the recommendations in this paragraph are less critical for this project – although the need for a coordinated strategy addressing uses, access, built form and urban design for the opportunity zone is still emphasised, in order to avoid future incremental, ad-hoc development on the remaining part of the campus available for significant new buildings.

Accommodation for staff, patients and carers

The Council has resolved to support provision of on-site accommodation for staff, patients and carers for this health campus which performs vital services for people across the state. The demolition of the Vera Adderley building removes on-campus accommodation, and it is recommended the option to provide new accommodation on campus is included in the long term planning for the south east section of the campus. The applicant should be encouraged to investigate the opportunity to incorporate staff/patient accommodation in additional floorspace in this project.

Comment: The proposal has been moved from its previous preliminary indicated location, and its location removes the recommendation to allow for a higher building. However, the need for staff, patient and carer accommodation on campus remains vital and should be included in planning for this opportunity zone.

Parking requirements

The application notes there is currently no Mental Health ICU on campus, but does not identify additional staff and patient numbers associated with the proposal. This should be clarified, and the requirements of the Council's Parking DCP addressed.

Comment: The proposal states that 10-15 carparking spaces will be provided in the existing multi-level carpark along Nurses Drive, in which some 15 spaces were available as spare capacity during the day. Council notes that no mention of the carparking requirements of visitors and where these would be accommodated has been made in the EA. Please note that Council's DCP Parking states that for Hospitals, the following carparking rate applies:

1 visitor space per 3 beds; plus

1 space per 2 employees; plus
1 space per doctor;
plus adequate spaces(s) for ambulance parking

Consultation
The JBA submission noted Council was consulted about this proposal on 17 June 2010. This meeting was in fact about a different project for Sydney children's hospital. While the PICU was mentioned, no information about the proposal was provided, and no feedback was sought or given.

Comment: A subsequent meeting was held with the applicant at which the comments made in blue were discussed and clarified.

2. Landscape Comments

The Arboricultural Impact Assessment by Redgum Horticulture, reference no. 6083, dated 20 December 2010 *("the Arborists Report")* identifies a total of 25 native and exotic trees in the area of the proposed works that are covered by the provisions of Council's Tree Preservation Order (TPO), of which, 2 have already been recently removed (trees 8 & 26).

The Arborists Report states that 13 trees will need to be removed in order to accommodate the development, with a total of 12 identified for preservation, as this will ensure that reasonable levels of environmental amenity are maintained for the site and surrounding area.

Primarily due to the large scope of works, Council does not object to the removal of Trees 3-7, 9-13 & 20-21 as shown on the submitted plans and Arborists Report.

Further, Council supports the preservation of Trees 1-2, 14-19, 22-24, and are to be retained and protected in accordance with Points 7.1 - 7.8, Recommendations, of the Arborists Report.

While only minimal landscape treatment is being proposed, primarily due to the footprint of the proposal, it must be completed in accordance with the Ground Floor and Lower Ground Floor Landscape Plans by 360 Degrees Landscape Architecture, drawing numbers LAN-SD-00-00 & 01, project no S1009002, issue 4, dated 11/01/11, prior to Occupation of the building as it will be of benefit to visitors, staff and patients.

3. Traffic Management Plan

Prior to the commencement of any building works, the applicant shall submit for approval and have approved by Council's Traffic Engineer a detailed construction traffic management plan. The plan shall demonstrate how construction and delivery vehicles will access the development site during the demolition and construction phase of the development.

All traffic associated with the subject development shall comply with the terms of the approved construction traffic management plan.

The applicant is advised that Avoca Street is a State Rate and thus may also need to liaise with the RTA regarding access from Avoca Street.

4. Service Authority Comments

A public utility impact assessment must be carried out on all public utility services on the site, roadway, nature strip, footpath, public reserve or any public areas associated with and/or adjacent to the development/building works and include relevant information from public utility authorities and exploratory trenching or pot-holing, if necessary, to determine the position and level of service.

The applicant must meet the full cost for telecommunication companies, gas providers, Energy Australia and Sydney Water to adjust/repair/relocate their services as required. The applicant must make the necessary arrangements with the service authority.

Any electricity substation required for the site as a consequence of this development shall be located within the site and shall be screened from view. The proposed location and elevation shall be shown on all detailed landscape drawings and specifications. The applicant must liaise with Energy Australia prior to lodging the construction certificate to determine whether or not an electricity substation is required for the development.

5. Drainage Comments

If Major Civil/Drainage Construction Works is proposed on Council Property:

A separate written approval from Council is required to be obtained in relation to all works which are located externally from the site within the road reserve/public place, in accordance with the requirements of the Roads Act 1993. Detailed plans and specifications of the proposed works are to be submitted to and approved by the Director of City Services prior to commencing any works within the road reserve/public place.

All works within the road reserve/public place must be carried out to the satisfaction of Council and certification from a certified practicing engineer is to be provided to Council upon completion of the works.

Relevant Council assessment and inspection fees, as specified in Council's adopted Pricing Policy, are required to be paid to Council prior to commencement of the works.

External Drainage Design Works

All stormwater runoff being discharged from the site shall be directed to Council's underground drainage system to the requirements of Council's Asset Drainage Engineer (Mr T Kefalianos – 9399 0925). The applicant should liaise with Council's Asset Drainage Engineer prior to submitting proposed drainage plans for approval by Council's Asset Drainage Engineer.

A work-as-executed plan prepared and signed by the hydraulic engineer or a registered surveyor, must be submitted to Council prior to the issuing of an occupation certificate, detailing the as constructed details for all works within Council's road reserve (including detailed levels).

All drainage details (for the external drainage works) shall be prepared by a suitably qualified hydraulic consultant who shall, at the completion of the works, certify that the drainage works have been constructed in accordance with the approved drainage plans and relevant standards. The plans and specifications for all works on Council property shall be submitted to and approval by Council prior to the issuing of a construction certificate.

Internal Drainage Design Works

Should stormwater be discharged to Council's street drainage system, on-site detention must be provided to ensure that the maximum discharge from the above site is not to exceed that which would occur during a **1 in 5** year storm of 1 hour duration for the existing site conditions. All other stormwater run-off from the above site for all storms up to the 1 in 20 year storm is to be retained on the site for gradual release to the kerb and gutter or drainage system as required by Council. Provision is to be made for satisfactory overland flow should a storm in excess of the above parameters occur.

Should no formal overland escape route be provided for storms greater than the design storm, the on-site detention system shall be sized for the 1 in 100 year storm event.

For small areas up to 0.5 hectares, determination of the required cumulative storage must be calculated by the mass curve technique as detailed in Technical Note 1, Chapter 14 of the Australian Rainfall and Run-off Volume 1, 1987 Edition.

Where possible the detention tank must have an open base to infiltrate stormwater to the groundwater. Note that the ground water and any rock stratum has to be a minimum of 2.0 metres below the base of the tank.

The detention area/infiltration system must be regularly cleaned and maintained to ensure it functions as required by the design.

Any onsite detention/infiltration systems shall be located in accessible areas.

The floor level of all habitable and storage areas adjacent to the detention area (and/or infiltration systems with above ground storage) must be a minimum of 300mm above the maximum water level in the detention area for the design storm or alternately a permanent 300mm high water proof barrier is to be constructed.

A childproof and corrosion resistant fastening system shall be installed on access grates over pits/trenches where water is permitted to be temporarily stored.

Should a pump system be required to drain any portion of the site the system must be designed with a minimum of two pumps being installed, connected in parallel (with each pump capable of discharging at the permissible discharge rate) and connected to a control board so that each pump will operate alternatively. The pump wet well shall be sized for the 1 in 100 year, 2 hour storm assuming both pumps are not working.

The pump system must also be designed and installed strictly in accordance with "Section 8.4 PUMP SYSTEMS" as stipulated in Randwick City Council's Private Stormwater Code.

Prior to occupation of the development, a "restriction on the use of land" and "positive covenant" (under section 88E of the Conveyancing Act 1919) shall be placed on the title of the subject property to ensure that the onsite detention system is maintained and that no works which could affect the design function of the detention system are undertaken without the prior consent (in writing) from Council. Such restriction and positive covenant shall not be released, varied or modified without the consent of the Council.

Notes:

a. The "restriction on the use of land" and "positive covenant" are to be to the satisfaction of Council. A copy of Council's standard wording/layout for the restriction and positive covenant may be obtained from Council's Development Engineer.
b. The works as executed drainage plan and hydraulic certification must be submitted to Council prior to the "restriction on the use of land" and "positive covenant" being executed by Council.

Prior to the issuing of an occupation certificate, the applicant shall submit to Council, a works-as-executed drainage plan prepared by a registered surveyor and approved by a suitably qualified and experienced Hydraulic Engineer. The works-as-executed drainage plan shall be to the satisfaction of the Principal Certifying Authority (PCA) and shall include the following details:

The location of the detention basin with finished surface levels;
Finished site contours at 0.2 metre intervals;
Volume of storage available in the detention areas;
The location, diameter, gradient and material (i.e PVC, RC etc) of all stormwater pipes;
The orifice size(s) (if applicable);
Details of any pumping systems installed (including wet well volumes).

Prior to the issuing of an occupation certificate, the applicant shall submit to the Principal Certifying Authority (PCA) and Council, certification from a suitably qualified and experienced Hydraulic Engineer confirming that the design and construction of the stormwater drainage system complies with the conditions of development consent. The certification must be provided following inspection/s of the site stormwater drainage system by the certifying engineers and shall be provided to the satisfaction of the PCA.

Seepage water **must not** be collected and discharged from the site.

Should you have any queries, please do not hesitate to contact Council's officer, David Ongkili, on 9399 0793.

Yours faithfully,

Kerry Kyriacou
Manager – Development Assessment