

Response to Submissions

Mental Health Intensive Care Unit Prince of Wales Hospital

Submitted to
Department of Planning
On Behalf of NSW Health Infrastructure

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Attachments

- 1** Response to Submissions
JBA Planning

1.0 Introduction

An Environmental Assessment Report (EAR) for a Project Application for the development of the Prince of Wales Hospital Mental Health Intensive Care Unit (POWH MHICU) at Randwick was publicly exhibited for a period of 30 days between 9 February 2011 and 11 March 2011.

In total four agency submissions were received in response to the public exhibition of the Project Application, in addition to a public submission and a submission from Randwick City Council. No major issues were identified in the submissions, however the following minor issues were identified:

- personal security;
- removal of trees;
- parking and traffic;
- travel choices and pedestrian and cycle paths; and
- draft conditions of approval.

The proponent (NSW Health Infrastructure) and its specialist consultant team have reviewed and considered the Department's comments and the public and agency submissions and, in accordance with clause 75H(6) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), responded to the issues raised. This Response to Submissions sets out the proponent's response to the issues raised and provides a revised Statement of Commitments for which approval is now sought.

This report should be read in conjunction with the Environmental Assessment Report (EAR) dated January 2011 and forms part of the Project Application.

2.0 Key Issues and Proponent's Response

The following section provides a detailed response to the key issues raised by the submissions. **Attachment 1** provides a response to all the issues raised during the public exhibition period.

Personal Security

Concern was raised by neighbouring residents regarding potential personal security implications resulting from the development. As detailed in the EAR (Section 3.3), the facility has been designed from the outset as a high security facility and incorporates many features to ensure the safety and security of patients, staff and the surrounding community. These security measures will ensure that patients are appropriately managed and will not pose a security risk to the surrounding residents.

Removal of Trees

A neighbouring resident raised concern with the proposed tree removal to enable the development. It was suggested that the proposed building be relocated to allow more trees to be retained. However, the location of the building was a considered response to the long term development of this portion of the health precinct, with the proposed layout allowing for a future building to be constructed that addresses Avoca Street.

It should also be noted that a number of significant trees located between the proposed building and the residential properties to the east will be retained. These will continue to screen the existing multi-deck car park and the proposed new building from these properties to the east of the site. It should be noted that Council's submission stated that the retained trees will:

"ensure that reasonable levels of environmental amenity are maintained for the site and surrounding area".

The resident submission also raises concern that the tree removal will increase the acoustic impacts of helicopter operations. It is not considered that the retention of the trees on the development site would significantly ameliorate the impact of noise from helicopter movements.

Parking and Traffic

Council requested that visitor parking be provided in accordance with the DCP requirements. However, these DCP requirements were prepared in relation to a typical hospital development and not a dedicated mental health intensive care unit. Because of the nature of this unit, patients within this unit do are not typically receive visits from friends and family but rather from external clinical staff, community service workers and the like. As detailed in the EAR, the number of these visitors is not likely to exceed one visitor per patient per day. Considering the number and type of visitors, it is considered appropriate for them to utilise the adjoining multi-deck car park rather than to provided dedicated parking on the development site.

Travel Choices and Pedestrian and Cycle Paths

Transport NSW requested further information be provided regarding the support of travel choices and existing pedestrian and cycle networks. The proposed facility will be fully integrated with the existing operations of the Prince of Wales Hospital, and this integration will include the revision of staff and visitor travel guides where and when appropriate. These travel guides will include reference to and promote sustainable means of transport.

As noted above, due to the nature of the use and visitation to the facility, significant shifts in travel choices towards public transport or other sustainable means are less likely than for other facilities within the health campus.

The existing pedestrian and cycle paths are shown on the Site Analysis Plan (AR_MHICU_DA_A 03 (05)) prepared by BVN. This demonstrates that the proposed development will be serviced by existing pedestrian and cycle connections.

Draft Conditions of Approval

The draft conditions of approval prepared by Randwick City Council refer to construction certificates, occupation certificates and the like. As the proposed development is 'Crown building work', these references should be amended to reflect the correct terminology and processes available to Crown building work under clause 109R of the *Environmental Planning and Assessment Act 1979*.

3.0 Final Statement of Commitments

In accordance with Part 3A of the *Environmental Planning and Assessment Act 1979*, the following are the commitments made by NSW Health Infrastructure to manage and minimise potential impacts arising from the proposal. These commitments replace the draft commitments included with the EAR.

3.1 Ecologically Sustainable Development

The proponent commits to the preparation of a Building User's Guide prior to the occupation of the building.

3.2 Construction Management

The proponent commits to implementing the following plans during the construction phase. The following documents will be prepared prior to the commencement of works:

- Construction traffic management plan;
- Construction waste management plan;
- Construction noise management plan;
- Construction vibration management plan;
- Construction dust management plan; and
- Erosion and sedimentation control plan.

3.3 Building Code of Australia

The proponent commits to providing a development which is compliant with the BCA and developing alternative solutions where practicable as outlined in the BCA Preliminary Report prepared by McKenzie Group Consulting.

3.4 Consultation

The proponent commits to further public consultation throughout the development process as considered relevant.

4.0 Conclusion

In terms of the issues raised during the public exhibition process, this Report in conjunction with the Environmental Assessment Report has demonstrated that the Project Application will have minimal adverse environmental effects.

In light of the benefits of the proposed development and the absence of any adverse environmental impacts, we have no hesitation in recommending this Project Application be approved.

Prince of Wales Hospital, Randwick – Mental Health Intensive Care Unit

Project Application – Response to Submissions

Issues Raised		Proponent Response
Sydney Water		
1	The existing water system has sufficient capacity to service the proposed development. The proponent will need to connect to the 150mm drinking water main on the eastern side of Avoca Street.	Noted
2	The existing wastewater system has capacity to service the proposed development. The developer can connect to the available 225mm main on the eastern side of Avoca Street or the 225mm main on the southern side of Barker Street.	Noted
3	In the event that trade wastewater is generated, the property owner is required to apply for permission to discharge this wastewater prior to business activities commencing.	Noted
4	Sydney Water will further assess the impact of the development when the proponent applies for a Section 73 Certificate.	Noted
Transport NSW		
1	<p>Transport NSW considers that the proposal does not adequately consider some aspects of the Director General’s Requirements, in particular:</p> <ul style="list-style-type: none"> ▪ address how users of the development will be able to make travel choices that support the achievement of relevant State Plan targets; ▪ detail the existing pedestrian and cycle movements within the vicinity of the site; ▪ describe the measures to be implemented to promote sustainable means of transport including public transport usage and pedestrian and bicycle linkages in addition to addressing the potential for implementing a location specific sustainable travel plan. 	These issues are discussed in the response to submissions.

2	Transport NSW requests the provision of details of the sustainable transport measures such as a Workplace Travel plan for the Hospital which encourages walking, cycling and public transport use.	This issue is discussed in the response to submissions.
Randwick City Council		
1	The detailed design of the new footpaths and landscaping should prioritise pedestrian travel, avoiding level changes or changes to paving materials at driveway crossovers, and should allow for future connection through to Avoca Street.	The proposed development is consistent with these detailed design recommendations.
2	Council notes that no mention of the carparking requirements of visitors and where these would be accommodated has been made in the EA. Council's Parking DCP requires 1 visitor space per 3 beds.	This issue is discussed in the response to submissions.
3	Landscaping 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 11/01/00, prior to occupation of the building.	Noted
4	The applicant shall submit a detailed Construction Traffic Management Plan to Council for approval prior to the commencement of works.	Noted. This requirement is included in the Statement of Commitments
5	A public utility impact assessment must be carried out for all public utility services on the sites and surrounds, and include relevant information from public utility authorities. The applicant must meet the full cost of any amplification or adjustment of existing services required to service the proposed development.	Noted
6	Any electricity substation required to service the development shall be located within the site and suitably screened from view.	Noted
7	A separate written approval is required from Council for any works located externally from the site within a road reserve or public place. Details of such works are to be submitted and approved by the Director of City Services prior to the commencement of works.	Noted
8	All stormwater and drainage systems discharging to Council's drainage system shall be designed in accordance with the requirements of Council's Asset drainage engineer and subject to Council's approval. All drainage details shall be prepared by a suitably qualified hydraulic consultant. Works-as-executed plans shall be submitted to Council for approval prior to the issuing of an Occupation Certificate.	Noted

Sydney Airport Corporation Limited (SACL)		
1	SACL has no objection to the proposed development to a maximum height of 59.6 metres above Australian Height Datum.	Noted
2	Should the height of any temporary structures or equipment be greater than 50 feet (15.24 metres) above existing ground height, a new approval must be sought in accordance with the Civil Aviation (Buildings Control) Regulations Statutory Rules 1988 No. 161.	Noted
3	Construction cranes may be required to operate at a height significantly greater than that of the proposed controlled activity, and consequently may not be approved under the Airports (Protection of Airspace) Regulations. Approval to operate such equipment should be obtained prior to any commitment to construct, and an application should be submitted to SACL at least 35 days prior to the commencement of works.	Noted
4	To minimise the potential for bird habitation and roosting, the Proponent must ensure that the following plans are prepared prior to construction commencing: <ul style="list-style-type: none"> ▪ Landscape Plan which only includes non-bird attracting plant species; ▪ Site Management Plan which minimises attractiveness for foraging birds; and ▪ The proposed development incorporates anti-bird roosting measures to discourage bird habitation. 	Noted. As with the remainder of the Randwick Health Campus, appropriate measures will be implemented to ensure that impacts on flight operations from bird communities are minimised.
5	All trees planted shall not be capable of intruding into the Obstacle Limitation Surface when mature.	Noted
Department of Environment, Climate Change and Water(DECW)		
1	DECW has no comments and no further interest in being involved in this project.	Noted
Owners Corporation- 255 Avoca Street, Randwick		
1	The removal of more than 50% of the existing mature trees within the subject site is unacceptable visual impacts due to their loss from the local streetscape and the resultant reduction of screening to the multi-storey carpark.	This issue is discussed in the response to submissions.
2	The removal of the trees is unjustifiable given that the proposal involves a smaller building footprint than that of the previous building which existed on the site.	This issue is discussed in the response to submissions.
3	The Visual Impact Assessment is flawed as it does not appropriately consider the visual impact of the proposed tree removal.	The photomontages prepared by BVN (see architectural drawing AR_MHICU_DA_Z 04(2)) illustrate the views of the proposed development from Avoca Street. These photomontages incorporate the trees to be removed and the trees to be retained.

4	The EAR has not considered the acoustic impact of the heliport, which will be amplified as a result of the proposed tree removal.	This issue is discussed in the response to submissions.
Public Submission		
1	The unexpected behaviour of patients of the proposed development will have serious stress and social impacts on the author of the submission.	This issue is discussed in the response to submissions.