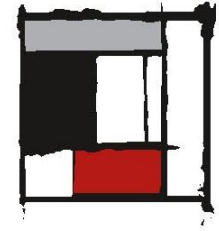


Friday, 3 June 2022

Ref: ck220511- rfi response

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Project                    **Alterations and Additions to President Private Hospital (SSD – 10320)**  
At:                        369-381 President Ave 61-65 Hotham Rd, 2-4 Bidurgal, Kirrawee  
Client                    Macquarie Health Corporation  
Project Ref:            MACHEALTH-06

## RESPONSE TO REQUEST FOR INFORMATION

Imagescape Design Studios has prepared this document on behalf of Macquarie Health Corporation in response to your Request for Information letter dated 29 April 2022. This request was accompanied by the following documents.

- Attachment 1 – Request for Further information. Itemised description of request
- Attachment 2 – Traffic Peer Review by The Transport Planning Partnership's (TTPP) dated 28<sup>th</sup> April 2022
- Attachment 3 – Heritage Peer Review by Mott Macdonald dated April 2022
- Attachment 4 – Flood Peer Review by GRC Hydro dated 24<sup>th</sup> March 2022

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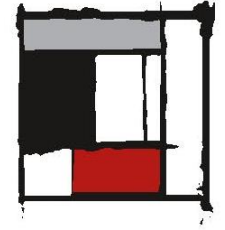
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Lucktime Pty Ltd trading as Imagescape Design Studios  
a.b.n 24 137 940 017  
imagescape design Studios is an architect corporation  
registered under the provision of the NSW Architects Act  
2003. Nominated architects are Christine Kelly registration  
no. 6000 and Stephen Phillios registration no. 4608

Friday, 3 June 2022

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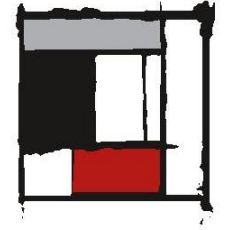
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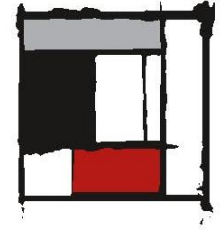
The project team have considered all matters raised by the Department and a response to each item is summarised in the following Table - Response to RFI. This document is accompanied by the following supporting documents.

<b>Attachment</b>	<b>Purpose</b>	<b>Author</b>
<b>A</b>	Certification for the Preparation of the EIS	Imagescape Design Studios
<b>B</b>	Cost Estimate – Updated CIV	BerCo
<b>C</b>	Clause 4.6 Variation Request – inclusion of Floor Space Ratio	Imagescape Design Studios
<b>D</b>	Aboriginal Cultural Heritage Report 1 Phase One and Two President Private Hospital – ACHAR Final 2 Phase One and Two President Private Hospital – Test Excavation Report Final	Archaeological Management Consultant Group
<b>E</b>	Contamination report updated to include Parklands and Communal Gardens	LG Consult
<b>F</b>	Utilities - Infrastructure Management Plan. Statement on consultation and applications together with provision of utilities to the site	Erbas and Associates
<b>G</b>	Flooding and Drainage response	Martens Consulting
<b>H</b>	Staging – ECI report covering options for staging and site establishment for staging options	Taylor's
<b>I</b>	Environmental Impact Statement	Imagescape Design Studios

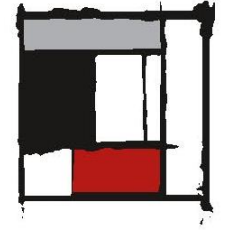


## Response to RFI

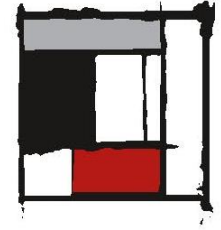
RFI		Proponent's response
General requirements.	EIS certification Provide a statement of certification for the EIS in accordance with the minimum requirements of clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000 (the Regulation). Note: Further information regarding this requirement is provided in Appendix B of the Preparing an Environmental Impact Statement December 2021 Guideline	Refer to Attachment A
Cost estimate	<p>Please provide an updated cost estimate report that provides the following information:</p> <ul style="list-style-type: none"> <li>An estimate of the jobs that will be created by the future development during the construction and operational phases of the development.</li> <li>Certification by the quantity surveyor that the information provided is accurate at the date of preparation.</li> </ul>	<p>An updated cost estimate report has been provided by BerCo Consulting dated May 2022. Refer attachment B</p> <p>The project will generate a total number of 11,949 man weeks of work during construction as calculated by BerCo Consulting and confirmed in their email dated 26 April 2022. This equates to 80 EFT construction jobs over a 3 year construction period. Refer Attachment B.</p> <p>The project will realise an operational staff increase of 177 EFT positions. This calculation was provided by hospital management as input into ML Traffic in their traffic reports submitted with the original response to SEARs documentation.</p> <p>This certification is provided on page 2 of the report dated May 2022. Refer Attachment B.</p>



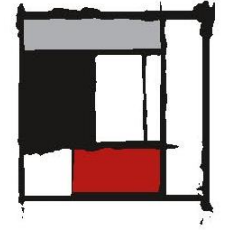
RFI		Proponent's response
	<ul style="list-style-type: none"> <li>Confirmation that the methodology used is consistent with Clause 3 of the Planning Regulation.</li> </ul>	Confirmation that the methodology is consistent with Clause 3 of the Planning Regulation is provided on page 2 of the report. Refer attachment B.
Strategic context	<p>The application describes the intent to amalgamate all lots within the proposal and rezone the existing R2 lot to SP1 zoning. However, in the absence of a current rezoning application please amend the Clause 4.6 Variation Request to address the existing floor space ratio requirements of the R2 zone.</p> <p>The strategic context of the President Avenue Hospital Redevelopment project is complex. The EIS describes increasing demand for mental health services at a national scale. A more detailed analysis of the strategic context of the project is required which adequately considers the potential impacts and benefits to the local and regional community which may result from all services the development would provide. The specific needs of the local and regional community must be described and the project justification reviewed in this context.</p>	<p>Refer to Attachment C for the amended Clause 4.6 Variation Request.</p> <p>Refer section 10 of the current EIS (V5)</p>
Built form and Urban Design	<p>The EIS states that the service delivery area is located in the basement where plans show it is on the ground floor on the north western boundary. Confirm the location of the proposed service delivery area and accuracy of submitted plans.</p>	Confirmation that the service delivery is located on ground floor level as shown in Drawing No. A 104 Ground Floor General Arrangement Plan.
Transport	<p>DPE have engaged an independent traffic engineer to review traffic aspects of the proposal.</p> <p>Concerns remain over the design of the proposed driveway layout for the southern carpark. The RTS describes that between 30 and 5 vehicles may potentially access the staff carpark during the AM and PM peak hours</p>	<p>The traffic report provided makes estimate of split between driveways and reflects that driveway for the southern car park does provide access to all parking spaces</p>



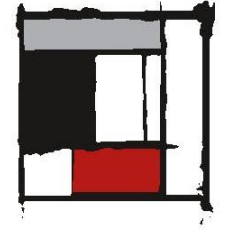
RFI		Proponent's response
	<p>from Presidents Avenue. However the Presidents Avenue driveway would provide access to all 168 on-site parking spaces</p> <p>Demonstrate, using quantitative methods, that the proposed driveway design would achieve efficient and safe ingress and egress from site for all vehicle use associated with the development during peak periods. Provide estimates of traffic movements for both President Avenue and Hotham Road access points during peak AM and PM periods. Clarify internal traffic movements in relation to parking and access from each access point. DPE's independent review of traffic and access is provided in the attachment of this letter (see Attachment 2).</p>	<p>All recommendations made by the TTPP (peer review) may be accepted and adopted as conditions of consent.</p>
<p>Environmental Heritage</p>	<p>The Department has reviewed the information contained in the revised RTS and considers that the development application, in its current form, does not adequately demonstrate that the complete demolition of Hotham House is necessary to achieve redevelopment of the site for the new hospital. Further, the Department considers that a more developed design or modified proposal which includes the retention and adaptive reuse of Hotham House may be feasible.</p> <p>The BCA report prepared by Blackett Maguire &amp; Goldsmith (July, 2019) only examines the use of the building as a Class 9A hospital inpatient unit. Feasible alternatives of other building classes were not adequately considered which may otherwise enable meaningful integration into the overall hospital scheme. The BCA report must be amended to consider other feasible alternatives for adaptive reuse of Hotham House (e.g. Class 5).</p> <p>The view that Hotham House is structurally unstable and that the cost of remedial work is not viable to enable the retention of Hotham House is not supported given the cost of maintenance relative to the Capital Investment Value of the project.</p>	<p>The inclusion of Hotham House was considered at great length within the design team, then again with the NSW Government Architects Office and then again as a Response to Submissions for this development.</p> <p>The considerations for its use varied from being an integral part of the new building to being a stand alone building. The uses varied from being part of the hospital administration to being leased to an independent tenant.</p> <p>The viability of its inclusion depended on two elements:</p> <ul style="list-style-type: none"> <li>• Access. The difference in level between Hotham house and the Hospital as well as to the Hotham Road pedestrian pathway is simply impractical to provide accessible pathway access to the broader community. The space used to provide ramps / lifts can be better utilised by hospital administration floorplate.</li> <li>• Economic investment. The cost to bring Hotham House into compliance under the National</li> </ul>



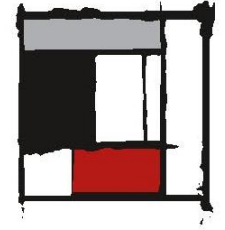
RFI		Proponent's response
	<p>A final hospital scheme is to be presented selecting a use for Hotham House that is compatible with the future needs of the hospital such as those proposed in the current (e.g. café, pharmacy, unidentified tenancy) or a use previously utilised by the hospital (e.g. administration facility, consulting rooms or gymnasium). Modification to non-significant fabric should be considered if necessary to facilitate integration options. Further feasible alternatives which consider the potential for changes to the building fabric internally, such as partial removal of walls or widening of doors may be considered to produce larger spaces to accommodate a wider variety of potential uses. The application must adequately consider these feasible alternatives as part of the Hotham House retention options analysis.</p> <p>Aspects of potential non-aboriginal archaeology on the site have not been assessed as required by the SEARs. Please include an assessment of archaeological potential on the site and any potential impacts. DPE's</p>	<p>Construction Code no matter what its use was not commercially viable.</p> <ul style="list-style-type: none"> <li>• Wayfinding. The proposed location of the hospital entry provides for the most logical arrangement of the hospital functions off a central entry point.</li> <li>• Site access. Due to typography, flooding and traffic requirements the proposed location of the hospital entry is the only viable entry point to the site</li> </ul> <p>These issues have been discussed at great length in previous submissions. Additional designs have been carried out with drawings and reports to support the issues have been provided. The outcome of alternate layouts has been exhausted.</p> <p>The need for complete demolition of Hotham House was demonstrated and accepted by the NSW Government Architects Office design review panel where various options for partial or full retention of Hotham House were explored and eventually rejected. The documented conclusion of the design review panel was that Hotham House could not be retained in whole or in part.</p> <p>The Heritage Peer Review by Mott Macdonald did not raise any new information requiring these previous investigations be revisited.</p> <p>A non-Aboriginal archaeology assessment of the site has only been carried out peripherally to the heritage assessment of Hotham House. It is suggested the approval be conditioned to require European</p>



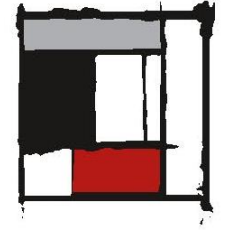
RFI		Proponent's response
	<p>independent heritage review of Hotham House is attached to this letter for your review (see Attachment 3).</p>	<p>archaeological investigation to be carried out in conjunction with the development of the heritage interpretive strategy for the site.</p>
<p>Aboriginal Cultural Heritage</p>	<p>The Aboriginal Cultural Heritage Assessment Report concludes with a recommendation that consultation with the registered Aboriginal stakeholders should continue. Complete this consultation as required by the SEARs and the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.</p> <p>The ACHAR is to be updated to demonstrate the results of the subsurface testing. Both the revised ACHAR and the archaeological technical report must then be provided to the registered Aboriginal parties (RAPs) for a minimum 28 day review period. Any feedback from RAPs must then be appropriately responded too and documented in the ACHAR. The report may then be finalised and used to support the current application.</p> <p>The Department and Heritage NSW will not review a draft report and cannot comment further on the appropriateness of the assessment until the results of the consultation with RAPs are presented.</p>	<p>Updated and final report provided. Refer attachment D1 and D2</p>
<p>Noise and Vibration</p>	<p>The proponent must submit an updated noise and vibration impact assessment which addresses the following requirements:</p> <ul style="list-style-type: none"> <li>• Further evidence that receiver C1 is appropriately classified in its identified management level considering its current land use (considering available information that the site is used as a skin clinic and eye specialist).</li> <li>• The noise and vibration impact assessment predicts that significant exceedances of noise goals would occur during all phases of construction across a wide range of sensitive receptors. However, the noise and vibration impact assessment states that at the time of writing, the</li> </ul>	<p>Acoustic Directions provided the noise and vibration impact statements required by the SEARs.</p> <p>On review of the points raised in the RFI Acoustic Directions stand by their recommendations in their original report. They do not recommend further investigation at this stage in the design process.</p> <p>The noise levels discussed in the Acoustic Impact Report are to be used as a reference for the builder and their contractors. The noise levels will assist in developing their construction logistics, selecting equipment and</p>



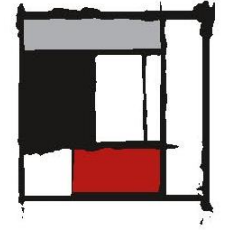
RFI		Proponent's response
	<p>estimated duration of construction works was not known. Further information is required to demonstrate that the proposed mitigation measures are fair and reasonable and adequately consider the full duration of the proposed construction program.</p> <ul style="list-style-type: none"> <li>• Impacts to the ongoing use of existing facilities as a sensitive use (hospital) must be considered during each construction phase and fair and reasonable mitigation measures demonstrated. Special attention should be given to vibration levels within operating theatres and imaging rooms with sensitive equipment (where present).</li> <li>• The noise and vibration impact assessment states that vibration levels are likely to exceed the EPA criteria during construction. Further quantitative analysis of the predicted vibration impacts is required with consideration of relevant human comfort criteria and potential structural damage of the hospital and surrounding developments. Fair and reasonable mitigation measures must be identified and described in greater detail.</li> <li>• Describe the mitigation measures to be used to manage impacts to the ongoing use of the site as a hospital during each phase of construction and demonstrate their effectiveness.</li> <li>• Mitigation measures described in the noise and vibration impact assessment are to be reflected in the draft CEMP and statements (in the CEMP) indicating that the project shall not exceed the limits set out in the EPA's Interim Construction Noise Guidelines are to be qualified or corrected.</li> </ul>	<p>establishing baselines for ongoing construction strategies. Work methods will be developed to minimise noise and vibration impacts on neighbours to within allowable guidelines.</p> <p>The mitigating measures recommended by Acoustic Directions will be integrated into the builders final Construction Management Plan.</p>
Contamination	<p>It is noted that the investigation levels applied to the assessment relate to industrial / commercial land use. Given the proposed development includes parklands and communal gardens used for group outdoor activities please provide further justification that the investigation levels</p>	<p>Refer attachment E confirming the suitability of the site for parklands and communal gardens.</p>



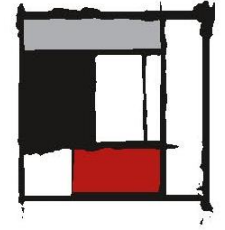
RFI		Proponent's response
	used to analyse soil on the site are suitable for the proposed development.	
Utilities	<p>The SEARs require the preparation of an Integrated Water Management Plan detailing any proposed alternative water supplies, proposed end uses of potable and non-potable water, and water sensitive urban design (WSUD). Further information should be provided addressing each issue and must include:</p> <ul style="list-style-type: none"> <li>• a summary description of the WSUD initiatives to be applied to the development</li> <li>• a description of how the objectives of S6.4 (3) of the LEP and Chapter 38 of the DCP have been considered and are addressed by the development</li> <li>• a description of how opportunities for rainwater harvesting and reuse will be realised by the development</li> <li>• include plans indicating the location and distribution of potable water, fire, sewer, roof water, non-potable water, detention facilities and relevant water infrastructure</li> <li>• describe quantitatively the water demands of the development and wastewater generated by the development</li> </ul>	The requested information has been provided by Martens in their drawings previously submitted for the project.
	The Infrastructure Management Plan submitted does not detail consultation that has occurred with affected agencies or service providers to ensure augmentation of utilities, easement requirements and staging of infrastructure can occur effectively or that the future capacity of infrastructure networks would be maintained. Please demonstrate adequate consultation with relevant agencies has occurred.	Refer attachment F by Erbas and Associates



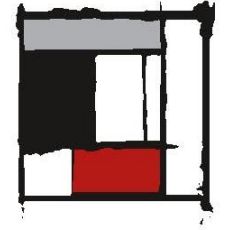
RFI		Proponent's response
	<p>Council raised concerns in relation to structures proposed over the existing stormwater easement and the RTS report states that proposed infrastructure has been relocated from this area. However, plans indicate a carpark, access ramps and walls over the alignment of the easement. Demonstrate through updated plans and further consultation with Council how this issue is to be acceptably resolved between all parties.</p>	<p>Macquarie Health Corporation provide an undertaking to rectify any damage occurring to any items by Sutherland Shire council during any maintenance work required by Sutherland Shire Council. Macquarie Health Corporation will not hold Sutherland Shire Council liable for any costs incurred.</p>
<p>Flooding and Drainage</p>	<p>The updated flood study still shows several aspects from Council's submission and DPE's peer review that remain unaddressed. Further clarification and design work is required to address specific aspects raised in areas of the report, including the following;</p> <ul style="list-style-type: none"> <li>• Further interpretation of the site's sensitivity to climate change is to be provided based on the modelling presented.</li> <li>• The north-western boundary of the site shows that existing floor levels would be impacted by the PMF event presented in the modelling.</li> </ul> <p>Please demonstrate compliance with the relevant planning controls.</p> <ul style="list-style-type: none"> <li>• Further reduction of offsite flood impacts and a reduction in flood risk to the access of the southern carpark is to be achieved through further design consideration of the proposed drainage swale.</li> <li>• Additional DCP controls are also identified that have not previously been addressed in previous reports.</li> </ul> <p>Please provide a comprehensive response to the specific issues raised in the attached peer review report (see Attachment 4).</p>	<p>Refer attachment G prepared by Martens</p>
<p>Staging</p>	<p>An amended preliminary Construction Environmental Management Plan (CEMP) must be submitted which is consistent with information submitted</p>	<p>The Preliminary Construction Management Report was 'preliminary' A more comprehensive construction</p>



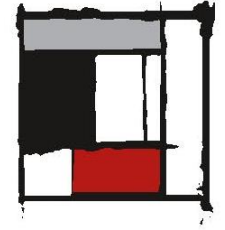
RFI		Proponent's response
	<p>in support of the Response to Submissions (RTS) Report and relevant technical studies. The amended preliminary CEMP must accurately reflect the proposed construction management measures and describe site specific mitigation measures for noise and vibration, traffic, and waste in greater detail. The proponent must provide a more detailed description of how infrastructure requirements would be coordinated and delivered to facilitate the development whilst continuing the use of the hospital during each stage or phase of development. The information may be provided in the form of a Staging Report or revised CEMP and must at a minimum address:</p> <ul style="list-style-type: none"> <li>• Set out how the construction of the whole of the SSD will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;</li> <li>• Set out how the operation of the whole of the SSD will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);</li> <li>• set out mechanisms for managing any impacts arising from each proposed stage or phase of development • describe which existing services will be maintained and at what level of service relative to the potentially reduced capacity of the site; and</li> <li>• demonstrate how suitable site access is maintained during each phase of construction for fire safety, emergency vehicles and people. Describe how relevant accessibility requirements will be addressed within operational areas during the construction program. Describe existing onsite parking arrangements and how these would be reduced or maintained during each stage of development.</li> </ul>	<p>management plan will be prepared in conjunction with the appointed builder prior to commencement of construction.</p> <p>Work on this has commenced with Taylor being appointed for early contract involvement.</p> <p>Refer Attachment H – Taylors ECI which provides more detailed information regarding staging, construction traffic management, program, and general construction logistics.</p> <p>This will be expanded on as planning for the construction phase progresses upon receipt of the Consent.</p>



RFI		Proponent's response
	<p>The proposed staging, construction hours and construction methods must be accurately reflected in the assumptions supporting key technical reports (e.g. noise impact assessment, flooding).</p>	
Waste	<p>An amended waste management plan must be submitted which addresses the following concerns:</p> <ul style="list-style-type: none"> <li>• The current waste management plan does not appropriately quantify the waste streams, further work is required to identify and quantify distinct waste streams during construction and operation.</li> <li>• Describe waste management during each phase of the project.</li> <li>• Confirm waste storage locations for waste identified for disposal and/or re-use on site.</li> <li>• Demonstrate that the proposed storage locations are adequately sized for all waste streams resulting from operation and during each phase of construction.</li> </ul>	<p>Details of waste collection and quantities have been provided in previously submitted Waste Management Report prepared by Waste Audit and Consultancy Services. Further detail on waste streams will be sought and integrated with the Construction Management Plan as detailed planning progresses.</p>
Construction Hours	<p>The EIS refers to proposed construction hours that differ from the standard construction hours provided in relevant guidelines and that have been used in the noise and vibration assessment for the project. Please update documentation for consistency and clarify when standard hours of work and out of hours work are apply so potential impacts and subsequent processes can be clearly understood.</p>	<p>The necessary revision has been made to Page 132 of the EIS (V5)</p>
Landscaping	<p>It is noted that the mitigation of visual privacy is achieved through screening with trees planted around the perimeter of the site. Please demonstrate a suitable plant selection and pot size to achieve this.</p>	<p>T23 was originally to be retained. Arising from the Exhibition Period, Sutherland Shire Council requested T23 be replaced with a more appropriate plant species, The applicant agreed to this request and hence the</p>



RFI		Proponent's response
	<p>Appendix 7 of the EIS identifies that T23 should be retained and tree protection measures will be implemented.</p> <p>The RTS states that T23 would be replaced in the current arrangement even though it was identified to be retained. Provide justification for the removal and replacement of T23.</p>	<p>amendment to its status in the RTS and amended landscape plans.</p> <p>Should it now be required that T23 be retained the applicant is agreeable to revert to this.</p>
<p>Plans and documents</p>	<p><b>Architectural plans</b></p> <p>The title sheet of the Architectural plans shows several details that do not match plans and information provided in the EIS such as the number of existing ground floor beds being retained, calculations of gross floor area and FSR calculations corresponding to relevant zoning. Please make the relevant updates as required. The EIS also includes discrepancy as to the Gross Floor Area. Please confirm throughout the document if it is 9,519m2 or 10,922m2.</p> <p><b>Details and finishes</b></p> <p>Please provide details of proposed fencing and retaining walls (including height and material).</p> <p><b>Signage Plan</b></p> <p>Please provide details of proposed signage identifying sign size, location and finishes to support the assessment for signage that has been</p>	<p>Revisions have been made on p17 – Section 2.3 Overview of the Development and p 33 – Section 4.2 Project Detail, in the current EIS. Revisions have been highlighted in yellow.</p> <p>The Gross Floor Area of the Development is 9,519m2.</p> <p>Height of fence and material is noted on the elevations. Confirmation that the fence is face brick to match that selected for the building and minimum 1800mm high or as dimensioned higher on the architectural drawings for particular locations.</p> <p>Retaining walls facing into the proposed development are generally of face blockwork. Retaining walls facing neighbouring properties or roads are of face brick to match that indicated for the building.</p> <p>Details for signage were not a SEARs requirement, however, section 7.3.3 State Environmental Planning</p>



RFI		Proponent's response
	<p>completed. Plans are required to compliment the assessment provided in the EIS.</p> <p><b>Preliminary Construction Plan</b></p> <p>Requirements to comply with NSW waste classification guidelines and the EPA's asbestos tracking requirements from the site to a lawful place of disposal need to be included.</p> <p><b>Statement of Commitments</b></p> <p>Provide a table of the proposed mitigation measures for the project (excluding any mitigation measures that are built into the physical layout and design of the project and captured in the project description).</p>	<p>Policy No. 64 – Advertising Signage responds how the proposal responds to the assessment criteria for advertising Signage.</p> <p>Requirements for the details of specific signage can be included in the conditions for the determination.</p> <p>This may be conditioned in the Consent.</p> <p>Refer section 10.5 of the current EIS (V5)</p>