SSD 7542 RPA Multi Storey Staff Car Park
Response to Submissions – October 2016

LIST OF ABBREVIATIONS

CEMP	Construction Environmental Management Plan
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement prepared for SSD 7542
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)
EPA	Environment Protection Authority of NSW
GELG	Guardian Early Learning Group
LSCCC	Lucas Street Child Care Centre
MSCP	Proposed RPA Multi Storey Staff Car Park
OEH	Office of Environment and Heritage
RMS	Roads and Maritime Services
RPAH	Royal Prince Alfred Hospital
SLHD	Sydney Local Health District
SSD	State significant development under the EP&A Act
TIA	Revised Traffic Impact Assessment prepared by GTA at **Attachment B**

AGENCY SUBMISSIONS

	Key Issue Raised	Response
Department of Planning and Environment (DPE)		
	Traffic Impacts	
	The Department requests further assessment be provided with regards to the impact of increased traffic volumes that the development may introduce to local residential streets - particularly those located in the residential catchment west of the development site including, but not limited to, Mallett Street, Fowler Street and Gibbens Street.	GTA have undertaken further assessment of the potential impacts of increased traffic volumes on the surrounding road network, as per the request from the DPE. This is detailed in the updated Traffic Impact Assessment at **Attachment B** (**TIA**).
	The City of Sydney Council has introduced traffic calming measures in proximity to the development site including footway widening along Church Street, footway widening at the intersections of Church Street with Lucas Street, Grose Street and Fowler Street, and speed cushions along Church Street between Brodrick Street and Grose Street. The implications of these traffic calming measures should be assessed with regards to traffic flow and the efficient movement of vehicles to and from the proposed car parking facility. Any implications on the LoS for intersections along Church Street should also be considered.	The updated TIA has taken into consideration the traffic calming measures that were recently introduced to the surrounding area. On-site observations, conducted by GTA, confirm that the recently completed traffic calming measures along Church Street (and shortly on Fowler Street at Mallett Street) has reduced vehicle speeds, though not necessarily reduced traffic volumes. The results of revised modelling indicate that intersections continue to operate within acceptable limits or similar to pre-development operation. This includes the key intersections on the periphery and along the Parramatta Road corridor.

	Key Issue Raised	Response
	Child Care Centre	
	The proposal would remove the existing Lucas Street Child Care Centre which currently provides around 70 child care places for RPA Hospital staff. The Department seeks further information with regards to the securing of an equivalent number of child care placements, including timing as to when these places will be made available. There should be no net loss of child care spaces as a result of the development and alternative placements should be secured within reasonable proximity to the site.	The Sydney Local Health District (SLHD) negotiated an agreement with Guardian Early Learning Group (GELG). GELG undertook expansion of their services in order to accommodate the families from the Lucas Street Child Care Centre (LSCCC). The majority of families transitioned to the GELG centre at Camperdown, just 600 metres from RPAH. A small number have moved to other centres operated by Guardian, and a further small group have moved to other arrangements that better suit their needs, resulting in no net loss in child care spaces. The fees at GELG are comparable to those charged at the LSCCC. Two of the staff transferred to the Concord Hospital Child Care Centre whilst the all of the remaining staff have been offered employment by GELG. Staff have been given offers no less favourable than their current employment.
	Bicycle Parking	
	The Department requests bicycle parking facilities be incorporated on the ground floor of the proposed carpark in order to encourage active transport usage.	The Royal Prince Alfred Hospital Transport Access Guide at **Attachment C,** identifies various locations across the hospital campus where existing bicycle parking is available. End-of-trip facilities are also provided for staff, including bathrooms and shower facilities in each building. On-site observations and feedback from the SLHD indicate that there is spare capacity across these bicycle parking facilities. The site is not the most desirable location for bicycle parking and given the observed capacity, would be unlikely to be used. Accordingly, no additional bicycle parking facilities will be provided within the proposed car park.

	Key Issue Raised	Response
Roads and Maritime Services (RMS)		
	Traffic Modelling	
	The SEARS requested the following intersections to be modelled: ▪ Parramatta Road/Missenden Road — Not Modelled ▪ Missenden Road/Carillon Avenue — Modelled ▪ Missenden Road/King Street — Not Modelled ▪ Church Street/Parramatta Road — Modelled ▪ Church Street/King Street — Not Modelled ▪ Mallett Street/Parramatta Road — Modelled ▪ Carillon Avenue/City Road — Not Modelled	Further RMS consultation has been completed following the Public Exhibition process and it was ultimately agreed that further intersection analysis was required to address some concerns of potential impacts to the regional road network. The following intersections have been added to the extensive modelling assessment already completed: ▪ Parramatta Road/ Bridge Road ▪ Parramatta Road/ Missenden Road ▪ King Street/ City Road/ Carillon Avenue ▪ Missenden Road/ Marsden Street ▪ Missenden Road/ King Street.
	The traffic modelling provided in the consultant's report has not considered the traffic impact at the intersection of Missenden Road and Parramatta Road. Missenden Road is a main connecting route to RPA hospital and therefore the Missenden Road/Parramatta Road intersection needs to be considered in the traffic modelling.	

	Key Issue Raised	Response
	The Bridge Road/Parramatta Road intersection should also be considered in the traffic modelling provided by the consultant. Bridge Road is the only road that allows right turn movements from Parramatta Road prior to Missenden Road travelling eastbound and therefore should be modelled as vehicles can access the car park from Bridge Road through the local streets.	It was also agreed that that analysis of the intersection of King Street/ Church Street was not required on account of it being left-in only from Carillon Avenue and not a logical approach or departure route for site generated traffic. This is detailed in the updated TIA at **Attachment B**.
	The Marsden Street/Missenden Road intersection allows right turn vehicles from Missenden Road. Motorists have the opportunity to turn right onto Marsden Street from Missenden Road to travel towards the proposed car park on Lucas Street. Roads and Maritime raises concerns regarding the impact this will have on the traffic lights as queuing will occur back to the Parramatta Road/Missenden Road intersection directly affecting the operation of the traffic signals. It should be noted, the next available right turn from Missenden Road to access Church Street is Dunblane Street which is located in close vicinity to the RPA.	

	Key Issue Raised	Response
City of Sydney		
	Social Impact	
	Child Care Centre The Environmental Impact Statement (EIS) states that it has appropriately addressed the relocation of the child care centre; however this justification is limited to statements that 70 places are already provided elsewhere on the site, and that the Sydney Local Health District is in the process of securing an equivalent number of child care placements within existing commercial child care operations within the Camperdown/Glebe area. No commitment has been made to providing an alternative facility in the near term. There is a significant shortage of childcare places in the locality, and the loss of the existing childcare facility without a commitment to provide an alternative facility is unacceptable. The City maintains its view that there is an opportunity to provide a replacement facility on the rooftop of the proposed car park, and recommends that this option be explored further.	The SLHD has negotiated an agreement with Guardian Early Learning Group (GELG). GELG undertook expansion of their services in order to accommodate the families from LSCCC and as such there has been no net loss in child care spaces. The majority of families transitioned to the GELG centre at Camperdown, just 600 metres from RPAH. A small number have moved to other centres operated by Guardian. A further small group have moved to other arrangements that better suit their needs. The fees at GELG are comparable to those charged at the LSCCC. Two of the staff transferred to the Concord Hospital Child Care Centre whilst the all of the remaining staff have been offered employment by GELG. Staff have been given offers no less favourable than their current employment. It is emphasised a child care centre located on the roof was found to not be feasible or appropriate during the design development stage of the proposal.
	Permissibility	
	Use in the Land Use Zone The site is zoned SP2 'Infrastructure', and the identified purpose is a 'Health Care Facility'. Car parks are not a permissible use in the SP2 zone; accordingly the car park is only permissible if it is ancillary to the identified 'Health Care Facility' use. If the Consent Authority was to approve the application, a condition of consent should be imposed restricting the use of the car park to staff of the health care facility. This will prevent the use of the car park by third parties as a private car park, which is prohibited in the zone.	As detailed within the Environmental Impact Statement (EIS), the MSCP is identified as ancillary to the existing operations of the RPAH and is permissible with consent within the SP2 Infrastructure (Health Services Facility) Zone. As outlined within the EIS, the proposed car park will be restricted to staff only. As identified by the City of Sydney, given the MSCP is ancillary to the existing RPA Hospital operations, the provisions of Part 7 Division 1 'Car parking ancillary to other development' of the Sydney LEP 2012 would apply.

Key Issue Raised	Response
In this regard, it is noted that the applicant has not provided an assessment against the provisions of Part 7 Division 1 'Car parking ancillary to other development' of the Sydney LEP 2012. This may be a result of an incorrect interpretation of Subclause (2) of Clause 7.1 'Objectives and application of Division', which states 'This Division applies to development for any purpose if car parking spaces are to be provided in relation to that purpose but not if the development is for the purpose of a car park'. As outlined above, a 'car park' as a stand-alone development is prohibited in the SP2 zone, unless it is ancillary to permissible uses. Accordingly, this car park must be ancillary and Part 7, Division 1 of the SLEP 2012 therefore applies.	Division 1 of the Sydney LEP 2012 seeks to identify the number of car parking spaces that may be provided to service particular uses of land and minimise the amount of vehicular traffic generated because of proposed development. The development of a multi-storey staff car park on the site has been proposed with the expressed intention of providing hospital staff with sufficient parking to accommodate their journey to work. Part 7, Division 1 does not expressly identify a Hospital Land Use, nor is it identified under Other Land Uses. While the Proponent recognises the need to limit oversupply of car parking spaces within the City of Sydney to reduce the potential for traffic generation, the associated staff parking demands for a hospital have been reviewed in detail (and are outlined within the updated TIA at Attachment B) and there is a recognised existing under supply to meet the needs of staff following recent expansion works within the RPAH Precinct. The proposed MSCP is considered to be essential ancillary infrastructure at RPA that is critical to operations and essential to attracting the best talent and staff retention and it should be assessed accordingly against Part 7, Division 1 of the Sydney LEP 2012.
No. of Car Parking Spaces 996 spaces are proposed; however the application does not provide any justification for this quantum of car parking. As outlined above, Part 7, Division 1 of the Sydney LEP 2012 applies. Accordingly, an audit of all existing, approved and proposed car parking spaces across the RPA site is required to be included in the supporting documentation to enable an assessment of the proposal against the car parking provisions of the Sydney LEP 2012. The RPA campus provides a mix of land uses, some of which have maximum car parking rates prescribed in the LEP, including: ▪ Office premises (Clause 7.6); ▪ Retail premises (Clause 7.7); ▪ Child care centres (Clause 7.9 (2)); and ▪ Health consulting rooms and medical centres (Clause 7.9 (4)). For the remainder of land uses on the RPA campus, such as the hospital itself, Section 3.11.4 'Vehicle parking' of the Sydney DCP 2012 states that the proposed rates of car parking are to be justified via a Parking and Access Report. Whilst a Traffic Impact Assessment has been submitted, evidence based justification for the proposed 996 spaces has not been provided.	The updated TIA at **Attachment B** concludes the following in relation to the requirement for car parking on site: *Several car parking areas are available within the RPAH precinct providing staff parking supply of 300 spaces, plus 77 visitor spaces and 70 spaces dedicated for use by fleet vehicles. 600 spaces are currently allocated to staff in the main existing multi storey car park south of the site with access via Grose Street (though noting that the rates charged by the private operator significantly exceed the Ministry fees policy and as a result, these spaces are poorly patronised by staff). In the short term, a further 427 spaces are currently available to staff and visitors in the existing multi storey car park, but are subject to public parking fee rates, meaning there will be minimal staff use. These 427 spaces would not however be available for future use given their allocation to the private hospital.* *On the above basis, while there are approximately 900 off-street spaces available to RPAH staff, patronage levels would be a fraction of this amount.*

	Key Issue Raised	Response
	In summary, it is recommended that the application be amended to: ▪ provide a full audit of existing, approved, and proposed car parking on the RPA Campus (the site boundary being commensurate with the SP2 'Health Services Facilities' zone boundary); ▪ establish the maximum permissible car parking provision for the uses identified in Part 7 Division 1 'Car parking ancillary to other development' of the Sydney LEP 2012; and ▪ justify the proposed quantum of car parking for uses not identified in the Sydney LEP 2012 through an evidence based Parking and Access Report, and in full consideration of other existing and approved car parking spaces elsewhere on the RPA site. Subclause (8) of Clause 4.6 'Exceptions to development standards' in the Sydney LEP 2012 specifies that the maximum car parking provisions contained within Division 1 of Part 7 'Car parking ancillary to other development' are development standards that cannot be varied. It is therefore essential that a more detailed assessment is carried out in accordance with the above requirements, as it is currently unclear if the quantum of car parking proposed exceeds the maximum number of spaces permitted. Additional car parking above the permitted maximum rates is prohibited, and must not be approved.	*Furthermore, the Proponent assessed the need for provision of a staff only multi storey car park within the RPAH campus. The assessment identified an existing staff parking demand associated with the morning shift of approximately 1,700-1,800 vehicles based on a detailed assessment with consideration of the following:* ▪ *existing staff FTE including typical Visiting Medical Officers (VMO)* ▪ *breakdown across shifts* ▪ *proportion of staff who currently drive to work* ▪ *average vehicle occupancy.* *Given that there are approximately 900 off-street spaces available for use by staff, this equates to a shortfall of 800-900 spaces. On this basis, the proposed car parking supply of 996 spaces is suitable to accommodate this shortfall, as well as allowing for demand associated with the peak staff changeover and some of the anticipated future growth.* Accordingly, while the Proponent recognises the need to limit oversupply of car parking spaces within the City of Sydney to reduce the potential for traffic generation, the associated staff parking demands for a hospital have been reviewed in detail and there is a recognised existing under supply to meet the needs of staff following recent expansion works within the RPAH Precinct.
	Parking and Traffic	
	Accessible Spaces Accessible parking spaces must be designed in accordance with Australian Standards including having the shared area located adjacent to the space. It is noted that the plan illustrated in the submitted Traffic Impact Assessment does not comply with this requirement.	GTA have confirmed that all accessible parking spaces have been designed in accordance with section 2.2.2 of AS2890.6:2009.
	Traffic Impact SIDRA modelling shows that although the level of service (LoS) of the Carillon Avenue-Grose Street intersection is expected to be unchanged (LoS 'E'); the degree of saturation will be substantially increased to 0.83 from 0.24 for the AM peak with this development. The performance of the intersection also worsens during the PM peak. The City is of the view that impacts to the intersection could be reduced if cars exiting the car park were diverted to Fowler Street, subject to access and egress from the western portion of the site being supported (refer to heritage discussion below). As a result of the proposal, the Parramatta Road-Mallet Street intersection LoS will deteriorate from 'E' to 'F', particularly in the AM peak. LoS 'F' indicates that the intersection will face extreme delay, and it is recommended that modifications and/or extra capacity may be required. The City's Transport and Access Unit recommends this impact should be addressed as part of this application, as Missenden Road and the intersections along it are already facing traffic congestion issues.	The proposal includes vehicle entry along Grose Street (Hospital Road) via the signalised intersection at Carillon Avenue. Vehicles would exit the site via Lucas Street and Church Street, thereby dispersing site generated traffic across several surrounding intersections to mitigate any such traffic related impacts. The spread of traffic during the afternoon departure is greater than during the morning arrival, hence further limiting the extent of impacts on surrounding intersections. The Proponent is committed to working with RMS, City of Sydney and other stakeholders to determine the need for any such intersection improvements at surrounding intersections, including Parramatta Road/ Mallett Street. The revised Transport Impact Assessment also addresses the following:

	Key Issue Raised	Response
	The City supports the recommendation of the Traffic Impact Assessment that two electronic signs displaying real-time available spaces be installed at the corner of Hospital Road/Brodie Street and at the entry point to the car park.	*The intersection of Parramatta Road/ Mallett Street does experience some additional queuing for the Mallett Street approaches, noting that the overall intersection operation (and Parramatta Road function) remains fairly consistent with existing conditions.* *The specific need or otherwise for any such intersection modifications would need to be investigated further, with any such implementation to be determined in consultation with RMS.* *As discussed throughout, the signalised intersection of Carillon Avenue/ Grose Street will need to accommodate a significant proportion of the proposed MSCP traffic. Naturally, there would be impacts to the function and operation of this intersection as a result of the proposal, especially when considering the cumulative impacts of this proposal and the private hospital. That said, the private hospital would also see the majority of the AM peak arrivals after 8:00am and certainly on the edge of peak generation associated with the proposed MSCP. The impacts on the intersection are likely to be limited to linemarking, turn bay extensions and removal of kerbside parking in order to maintain an acceptable intersection level of service. These potential modifications are illustrated in Figure 6.3 (existing) and Figure 6.4 (potential future).* Refer to **Attachment B**.
	Bicycle Parking It is noted that the proposal does not include any bicycle parking facilities. The City is of the view that some of the issues regarding lack of car parking at RPA could be mitigated if improved cycling facilities were provided to encourage modal shift to active transport. This development represents an opportunity to provide facilities such as change rooms, showers and secured areas for bike parking. The Traffic Impact Assessment notes that approximately 2,500 shifts commence in the AM peak, which can be used as a guideline for estimating the bicycle spaces. Sustainable Sydney 2030 envisages that at least 10 percent of City trips will be made by bicycle in the future. This would require around 250 bicycle spaces for this development. Notwithstanding the above, it is recommended that at least 100 bicycle parking spaces be provided to encourage alternative modes of transport. Staff/employee bicycle parking is preferred as class 2 facilities (known as Class 'B' in the latest Australian Standards) and provided as per AS2890.3:2015. Bicycle parking spaces should be consolidated in one area on the ground floor, for easy access and identification. It is recommended that bicycle parking and associated facilities are designed in accordance with Section 3.11.3 of the 'Bike parking and associated facilities; of the Sydney DCP 2012.	The Royal Prince Alfred Hospital Transport Access Guide at **Attachment C,** identifies various locations across the hospital campus where existing bicycle parking is available. End-of-trip facilities are also provided for staff, including bathrooms and shower facilities in each building. On-site observations and feedback from SLHD indicate that there is spare capacity across these bicycle parking facilities. The site is not the most desirable location for bicycle parking and given the observed capacity, would be unlikely to be used. Accordingly, no additional bicycle parking facilities will be provided within the proposed car park. It is further emphasised that DCPs are not a relevant matter for consideration in the assessment of a SSD Application.

	Key Issue Raised	Response
	Cyclist movement needs to be considered in the design of the car park access points. Access to bike parking areas are to be a minimum of 1.8m wide to allow a pedestrian and a person on a bike to pass each other. It is Council's preference that a directional signage plan be provided to guide cyclists from the street to the bicycle parking facilities. Refer to Australian Standard AS 2890.3:2015 for details.	
	Parking Permits Section 5 of the Transport Impact Assessment outlines a number of measures to promote sustainable transport. These are supported, however the City's Transport and Access Unit recommends that RPA develop a policy for allocating permits to staff members to use the proposed car park. That policy should focus on constraining private car travel and promoting sustainable transport.	RPAH has an existing policy that is used to allocate staff permits, which generally comprises of a wait list of the interested personnel who are assigned permits as they become available. RPAH is presently undertaking a review through consultative committee as to how parking will be allocated upon completion of the proposed MSCP.
	Sustainable Transport Initiatives To achieve sustainable goals the following should also be considered: *Car Share* The Sydney DCP 2012 suggests one (1) car share space be provided per 50 car parking spaces. This would provide a total of 20 car share spaces. The Traffic Impact Assessment suggests that one (1) car share space should be provided in total, which is unacceptable. It is recommended that at least 4 car share parking spaces are provided. *Car Pooling* The City's Transport and Access Unit recommends that a car-pooling system should be explored and implemented. The wider RPA precinct, University of Sydney Campus, St Andrew's College etc. are closely co-located; this provides a significant opportunity to implement a viable car-pooling system. *Green Travel Plan (GTP) and Transport Access Guide (TAG)* The development should implement a Green Travel Plan (GTP) and Transport Access Guide (TAG). The Secretary's Environmental Assessment Requirements (SEARs) require a pricing policy for use of the car park to align public transport and active transport targets with private vehicle targets. A Green Travel Plan for the RPA campus should be developed and implemented to encourage sustainable and active transport modes. It is recommended the applicant review information on Council's website about preparing Travel Plans. The applicant may also contact a member of the Transport and Access Unit to discuss the Green Travel Plan prior to its submission.	SLHD is continually investigating campus wide transport initiatives including a car pooling strategy. RPAH recently initiated a shuttle bus service between RPAH and Redfern Railway Station which runs at peak periods during the day and into the evening. The service has been well patronised and will be monitored and services expanded should its use continue to grow. SLHD has been in negotiation with Sydney Buses to increase the frequency of bus services to RPAH. To date, there has been no increase in service to the campus. Notwithstanding the above, it is recommended that a campus-wide Green Travel Plan be prepared to manage the future travel behaviour of staff and visitors to the Campus and identify appropriate travel demand management measures.
	Building Design	
	Street Interface The Sydney DCP 2012 requires car parking areas at ground level to be screened by active uses to a minimum depth of 6m from the facade visible to the street or public domain. The objective of this provision is to ensure that development contributes to the activity, safety, amenity and quality of streets and the public domain. While the DCP does not technically apply, this is nevertheless a principle that should be adopted.	Lucas Street is primarily used as a pedestrian and vehicle thoroughfare. The interface between existing development and the laneway comprises of full height walls or facades of solid construction, with occasional driveway entrances and exits. This is reflected in the City of Sydney DCP map does not identify any boundary of the subject site for active uses.

Key Issue Raised	Response
Due to the presence of the Consulate-General of the People's Republic of China, Lucas Street has a particularly poor interface with the public domain. It is largely inactive, and receives almost no passive surveillance. The construction of a car park at ground level will only exacerbate this problem. It is therefore recommended that the applicant sleeve the ground and first floor level parking to Lucas Street (as a minimum) with an active use, and incorporate windows facing on to Lucas Street.	The context of the site therefore does not lend itself to the successful provision or integration of active uses on the site. Furthermore, the very purpose of the development is to mitigate an existing need for vehicle parking spaces to serve RPAH staff. It would be an inefficient use of the hospital campus site to provide small scale retail offerings (and other such active uses) in place of valuable social infrastructure. It is noted that this MSCP will provide the opportunity for increased activity within this precinct of the hospital, when compared to the existing underutilise site, to promote passive surveillance and community 'policing'.
Building Expression The proposed materiality consists of masonry and perforated metal sheets. At ground level, the materials are face brick and a fairly basic metal mesh with orthogonal perforations (no detail is provided for this sheet). Above ground level, the metal panels are curved vertically and have circular perforations. The purpose of the curved sheets is to give expression to an otherwise rectilinear and utilitarian facade. It is recommended that the applicant provide additional details of Metal Sheet 'B' and the proposed face brick selection. It is preferable that all materials at pedestrian scale are high quality and durable and make a positive contribution to the public domain. The City requests to be provided with a physical materials board.	A physical materials board has been prepared by Fitzpatrick + Partners and accompanies this response under separate cover.
Overhangs The facade design includes curved metal screens which overhang the building footprint at ground level. This is acceptable, however the Lucas Street Section on drawing DA-0206 shows that the overhang starts at a height of 1.65m over the footpath level at the point of the section. This is not acceptable, and a re-design is required to ensure that the building alignment is clear of obstructions for at least 2.5- 3m above the level of the footpath.	The overhang is approximately 130mm in depth, is rounded in the corner, and is generally obstructed by the planter bed (refer to the section at **Attachment D**). Accordingly, it is not deemed to be a safety risk.
Light Spill The potential for negative impacts of light spill is not properly addressed in the application. The detail elevation on drawing DA-0204 shows that the perforations may be in the order of 75-100mm in size, despite being labelled as 'small'. This will allow the building to 'glow' at night time, as the scale of perforations does not provide any barrier to light spill. It is recommended that additional mitigation measures be considered to ensure that light spill does not negatively impact the surrounding locality. Measures should also be implemented to prevent headlight beams shining directly into habitable rooms in the Queen Mary Building (QMB).	The potential impacts of light spill from the proposed development has been carefully considered during its detailed design: ▪ The perforations in the façade screens have a diameter of 10mm (rather than 75-100mm) and as such serve to limit the extent of light spill in the surrounding area. ▪ No parking bays have been located immediately adjacent or perpendicular to the southern façade. ▪ The major bulk of the building has been pulled back from the western boundary to reduce the impact on the residents of Church St. The entry and exit ramps have a solid 1200mm high barriers to reduce light spill from entering/existing cars. ▪ Solid panels are to be fixed to the crash barriers within the car park to further block out direct light.

Key Issue Raised	Response
Overshadowing The proposal greatly impacts on solar access to both bedroom and living area windows in the QMB. The applicant has quantified the impact as an overall result to bedrooms on the north facade (70.8% of bedroom windows achieve 2 hours solar access), however this is not the intent of solar access provisions, which seek to provide better amenity to living spaces rather than bedrooms. As the application does not address this non-compliance, and the impact is considered significant, it is difficult to support the proposal on the basis of the negative impact to this building. A reduction in height may assist in improving solar access. This could be achieved by lowering the height of the building above ground, by providing some of the parking levels underground.	With regards to the Queen Mary student Building, it is emphasised that the provisions of State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development (SEPP 65) do not apply to this student accommodation development. This is reflected in the internal amenity standards that strictly relate to living rooms rather than bedrooms, which fails to consider the nature of compact student accommodation whereby bedrooms and living areas are combined. Accordingly, whilst it is best practice to consider the internal amenity of this property, as has been addressed in this section of the report, no standard can be applied under the legislation to the model of student accommodation. Consideration was given to mitigating the impacts on the QMB, including maximising the setback of the building, and minimising floor to floor heights to reduce as far as practicable the overall height of the building. Further excavation on the site to reduce the maximum height of the proposal was not feasible. It impacted entry to the MSCP, reduced natural ventilation at lower levels and in any case had marginal benefits to the overshadowing to QMB.
Floor to Floor Heights The proposed floor to floor height of the carpark is 2.65m. The height required above an accessible car park is 2.5m, leaving 150mm for slab, structural beams and any services including lighting, which appears to leave very little tolerance given that the slab thickness as shown on the 1:20 section detail is 200mm thick. Accordingly, the application does not demonstrate that the requirements of AS2890.6 in relation to the minimum height clearance over accessible car bays can be achieved. Greater floor to floor heights or another alternative are required.	The required floor to floor heights to achieve compliance for accessible car spaces have been achieved with the existing design.
CPTED The CPTED Report prepared by JBA notes that the proposed cladding limits opportunities for surveillance between the carpark and the adjacent Queen Mary Building (student housing) to the south of the site. The ground level plan and the east elevation show that the pedestrian entrance to the carpark is located at New East Hospital Road, and the path of travel to the internal lifts and stairs is via an open passage which provides free access. The waiting area at the lift is not visible from the street, and provides potential entrapment opportunities if access is not provided via a secure external building line and card entry. The Access Report notes on page 7 “advice has been provided from the design consultants that the client requirements is for the entrance TO NOT be provided with a doorway, rather security will be achieved through other means”. The report recommends high quality lighting throughout the internal areas of the carpark, particularly to remove shadows between cars and to minimise the contrast between shadows and illuminated areas. The potential for light spill to the adjacent student housing in the QMB as a result of this strategy must be considered as discussed	The proposed development will incorporate CCTV cameras, in accordance with the recommendations of the CPTED report.

	Key Issue Raised	Response
	above. It is recommended that the design include CCTV cameras internally as recommended in the CPTED report. It is also recommended that the entry should be redesigned to provide a secure external building line, inside which only authorised users of the car park can enter, via swipe card access or similar. One possible solution is to flip the plan so as to locate the lobby on the external side of the building and the lifts on the interior.	
	Signage The application seeks approval for signage, however insufficient information has been provided in this regard. It is recommended that a detailed signage strategy be prepared and submitted with the amended application.	A detailed signage plan for approval is provided at **Attachment E**. In view of the limited scale and number of signs on the site, a signage strategy is not considered to be necessary.
	Heritage	
	Demolition The School of Nursing building is an item of heritage significance that is included on NSW Department of Health's State Agency Heritage Register, as per Section 170 of the Heritage Act 1977. The building has not been adequately addressed, nor has its demolition sufficiently justified in the Heritage Impact Statement submitted with the application. There is no detailed description of the building, its history, nor a proper assessment of its fabric or significance. There is no assessment of the impact of the demolition of the building. Issue 8 of the SEARS requiring an assessment of the impact on the heritage significance of any heritage items on the site has therefore not been met. The City is of the strong opinion that the building should be retained and integrated into the new development. In the event that the demolition of the building is supported by the Consent Authority, which the City strongly opposes, there should be an archival photographic recording of it before demolition, and the history and significance of the site incorporated as part of a heritage interpretation plan for the site.	An archival photographic record of the building has been prepared and will be made available to City of Sydney Council. It is emphasised that the demolition or redevelopment of the School of Nursing Building is not within the scope of this SSD application and therefore not a matter for consideration by the determining authority. Further, it was not a matter of concern for the Office of Environment and Heritage (OEH) who confirmed that the site does not contain any heritage issues that would require a formal OEH response.
	Archaeology Issue 8 of the SEARS requires an assessment of any impact on heritage significance of potentially archaeological significant areas. This has not been provided for in the submitted Heritage Impact Statement. Moreover, the specific history of the subject site and the archaeological potential has not been addressed.	An assessment of potential archaeological significant areas on the site was conducted as part of the demolition and site preparation works assessed under Part 5 of the EP&A Act, and as such does not fall within the scope of this SSD application. We recommend a standard condition be applied to the proposal, in accordance with the condition suggested by the Heritage Council of NSW (discussed below).
	QMB The QMB is a large 11 storey building built in the Post War International Style to the design of prominent architects, Stephenson and Turner, which was completed in 1957. It is also included on NSW Department of Health's State Agency Heritage Register, as per Section 170 of the Heritage Act 1977. It is a local landmark that is highly visible particularly from Church Street. The building has been recently adaptively reused for student accommodation for Sydney University. The proposed nine level carpark, will obscure major views of the QMB from Church Street. Being located to its	Consideration was given to mitigating the impacts on the QMB, including maximising the setback of the building, and minimising floor to floor heights to reduce as far as practicable the overall height of the building. Further excavation on the site to reduce the maximum height of the proposal was not feasible. It impacted entry to the MSCP, reduced natural ventilation at lower levels and in any case had marginal benefits to the overshadowing to QMB.

	Key Issue Raised	Response
	immediate north-west, the new building will also have major visual, amenity and shadowing impacts on the QMB. While it is acknowledged that there would be cost implications, a far better design response would be to lower the height of the building above ground, by providing some of the parking levels underground, which would only lessen its impact on the QMB but also on the immediate surroundings of the site.	
	Landscaping	
	Western Landscape Interface The arrangement of vehicle access to the parking station creates awkward, leftover landscape spaces facing Church Street. The entrance ramp and exit driveways are all located externally to the building, and are highly visible at the western end of the site. The result is a poor relationship between the building and the public domain, in particular the Church Street frontage, which is directly opposite a number of heritage items. As outlined above, the City opposes the demolition of the School of Nursing building at this location, however if the Consent Authority was to support it, a meaningful landscape setback to Church Street is required. Ramps and entrances should be pushed to the east or contained within the structure to enable a useable space that continues the linear park from the south.	The proposed MSCP has been setback substantially from the Church Street frontage of the site, to align the proposed structure with the building line of the QMB to the east of the site. This landscape setback is more substantial and more accessible than the present treatment, and appropriately responds to linear planting spaces along this road frontage.
	Southern Landscape Interface The QMB to the south has numerous residential windows facing the proposal. This will compromise the view, and may compromise privacy for the adjacent residents. The applicant should consider the incorporation of a landscape setback to enable tree planting to screen the car park view from the Queen Mary Building.	The proposed development has been suitably designed so as to mitigate any potential private impacts for residents in the QMB. The façade screening prevents direct views into the student accommodation building so that the privacy of these residents can be maintained.
	Tree Removal The proposal removes 12 existing trees, replacing them with very limited landscape and provides parking to the full extent of the roof level. The resulting exposed concrete slab will contribute to the urban heat island effect, exacerbating an existing condition within the area. To mitigate this, it is recommended that the top level of parking is replaced with a child care facility with an extensive green roof to reduce the quantity of exposed concrete slab. This will resolve the loss of child care on the site, contribute to the local ecology, and reduce the impact on urban heat.	The proposed development will not result in a loss of child care spaces in the immediate area. As previously discussed, the GELG located 600 metres from RPAH has accommodated those children who were previously within the child care centre on the subject site. It is not considered appropriate or feasible to provide a child care centre on the roof of the proposed MSCP.
	Footway Planting The landscape plan indicates a design intent to plant climbers along the facade of the building. This requires changing portions of the public footway to terrabond to allow water penetration to the root area. Due to the increased foot traffic at street level it is likely that the terrabond would result in increased maintenance needs. For this reason and the increased trip hazard risk to the public the design cannot be supported. It is noted that owner's consent from the City, as owner of the Lucas Street footpath, has not been obtained. It is recommended that the applicant amend the plans to either delete the planting, or alter the building facade to accommodate the proposed planting wholly within the property boundary.	Proposed Planting zone will be maintained within the boundary including any terrabond if utilised to ensure that the footpath maintains its maximum width between the existing kerb line and the boundary.

Key Issue Raised		Response
NSW Environmental Protection Authority (EPA)		
	Assessment Process	
	The EPA is concerned that the dual assessment process may lead to inadequate environmental impact mitigation and management measures, including: ▪ Undertaking demolition and site preparation work outside standard hours recommended in the Interim Construction Noise Guideline; ▪ Undertaking demolition and site preparation without providing intra-day respite periods from rock breaking, jackhammering, and other high noise impact activities; ▪ And other than seamless transition of sediment and erosion controls and dust minimisation and mitigation measures, particularly should different lead contractors be engaged to undertake demolition, site preparation, site remediation and bulk earthworks and construction or combinations of those activities.	Any assessment of the demolition and early works will contain mitigation measures which require compliance with the Interim Construction Noise Guideline and other relevant controls. A Construction Environmental Management Plan that addresses these issues will be prepared and approved by the SLHD prior to any works commencing on site. The handover between the two scopes of work will be managed by the Proponent to ensure there are no environmental impacts that result from this process.
	Intersection	
	It is unclear why vehicular access is not proposed to be achieved via alternative means such as the internal (private) 'Hospital Road' which has a signalised intersection with Carillon Avenue.	The primary vehicular entry is proposed via Grose Street (Hospital Road) and its signalised intersection with Carillon Avenue. This is detailed in the updated TIA at **Attachment B**.
	Noise Mitigation	
	The proponent be required to: (i) to adopt a night-time background noise level of 40 dBA, OR (ii) provide a quantitative assessment of the 'night-time' background noise level measured at the most affected residence (corner of Fowler and Church Streets and in accordance with the guidance material provided in the New South Wales Industrial Noise Policy. And, identify the dominant and background noise sources present at the site throughout the monitoring period (including "identification and occurrence of noise sources" in accordance with INP B1.2) together with confirmation of whether these noise sources and resultant background noise levels would be typical of longer term background noise at the site; or provide further clarification and justification concerning why: (i) vehicle access should not feasibly and reasonably be obtained via the RPA internal road network (e.g. Hospital Road) or from Lucas Street some distance east of its intersection with Church Street (rather than directly or indirectly from Church Street), and (ii) solid walls, or acoustic louvres, or a combination of solid walls and acoustic louvres cannot feasibly and reasonably be incorporated into the wall/ side of the carpark immediately opposite the student accommodation and Fowler Street residences; and ensure that any plant and equipment that may need to be installed does not generate noise (i) at a level (measured at the most affected noise sensitive receivers) that exceeds 5 dBA above the night-time background noise level, and	An addendum to the Acoustic Assessment has been prepared by Acoustic Logic in response to the matters raised by the EPA (**Attachment F**).

	Key Issue Raised	Response
	(ii) that exhibits tonal or other annoying characteristics likely to cause sleep disturbance. The acceptable noise criteria is the NSW Industrial Noise Policy, January 2000	
	Contamination and Remediation	
	The EPA has identified the following site specific concerns based on the information: a) the need to undertake a detailed assessment of potential site contamination (including information about groundwater following demolition of existing buildings, paved surfaces and infrastructure);	A detailed assessment of potential site contamination, including impacts on ground water, can be conditioned to occur prior to work commencing on this project on the basis of the Remediation Action Plan
	b) handling, transport and disposal of any asbestos waste encountered during demolition, site preparation and bulk earthworks	These issues relate to works that do not form part of this MSCP SSD. However, contingencies are detailed in the SSD mitigation measures with regards to unexpected finds on the site encountered during construction.
	a) demolition, site preparation, bulk earthworks, construction and construction-related noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on noise sensitive receivers such as surrounding residences;	An addendum to the Acoustic Assessment has been prepared by Acoustic Logic in response to the matters raised by the EPA with particular regard to construction works.
	b) demolition, site preparation, bulk earthworks and construction phase dust control and management;	An Construction Environmental Management Plan (CEMP) accompanied the SSD application. The mitigate measures for this application required that a detailed CEMP be prepared by the relevant contractor prior to the commencement of works on the site. This CEMP will include detailed measures relating to dust control and management throughout construction.
	c) demolition, site preparation, bulk earthworks and construction phase erosion and sediment control and management;	An Erosion and Sediment Control Plan accompanied the SSD application. The measures outlined in this plan will be installed prior to commencement of any work on the site and maintained throughout the duration of the works and/or until any areas that require to be turfed and landscaped have been completed. This plan is available on the DPE website, and has not been reattached.
	d) operational noise impacts on noise sensitive receivers; and	Operational noise impacts were discussed in the Acoustic Assessment prepared by Acoustic Logic, which accompanied the SSD application. This assessment has been further supported and updated, and accompanies this response at **Attachment F**.
	e) operational water quality impacts on surface waters.	A MUSIC modelling report has been prepared by Cardno (**Attachment G**) in response to the operational water quality impacts on surface waters.
	the site investigation did not meet the minimum soil sampling soil density recommended in the EPA guidelines but will be met in the course of further investigation under way at the time of writing Attachment K (section 10, item 1, p.27);	Additional testing will be carried out prior to the commencement of bulk excavation. Materials found will be assessed in line with the submitted RAP.
	the site inspection (section 2.5, p. 4) did not include internal inspection of the existing pre 1990s buildings, including the 2 storey brick building on the corner of church and Lucas Streets and the single storey brick building used as a pre-school;	These existing buildings do not fall within the scope of this MSCP SSD application. The demolition of these structures and site preparation works are to be undertaken as part of a separate application, which will be subject to separate mitigation measures.
	significant data gaps need to be addressed by further investigation (section 9.3., p.26)	Additional testing will be carried out prior to the commencement of bulk excavation. Materials found will be assessed in line with the submitted RAP.

	Key Issue Raised	Response
	buildings previously demolished on the site would have been constructed at a time that may have involved the use of hazardous building materials (Table 3-1, p.8);	Additional testing will be carried out prior to the commencement of bulk excavation. Materials found will be assessed in line with the submitted RAP.
	a site remediation action plan should be prepared pending completion of demolition of existing structures (Table, section 10, p.27) and in accordance with the Guidelines for Consultants Reporting on Contaminated Sites; and	A Remediation Action Plan was prepared by Environmental Investigation Services and accompanied the SSD application.
	site validation assessment is required (Table, section 10, p.27).	Noted. The mitigation measures within the Remediation Action Plan in the SSD application required validation testing and a validation report be prepared following the remediation of the site. This can be dealt with as a condition of consent.
	Construction Hours	
	The proponent be required to ensure that demolition, site preparation, construction and construction-related work is undertaken only during ·the standard construction hours recommended in Table 1 Chapter 2 of the Interim Construction Noise Guideline, July 2009.	Noted. This can be dealt with as a condition of consent.
	The proponent be required to schedule intra-day 'respite periods' for construction activities identified in the Interim Construction Noise Guideline as being particularly annoying to noise sensitive receivers, including surrounding residents and both nearby hospitals.	Noted. This can be dealt with as a condition of consent.

	Key Issue Raised	Response
Inner West Council		
	Traffic and Parking	
	Traffic Generation It is imperative to assess current parking demand and the impact of parking proposed for this precinct. This is necessary as it is stated in the EIS that there has been a shortfall of parking spaces through reductions of on-site parking and increased parking demand from new facilities in the precinct. The City of Sydney Local Environmental Plan (LEP) 2012 states in Clause 7.18 that development should not be granted unless it can be satisfied that the "development will not encourage persons to travel in private vehicles between 7am and 9.30am or between 3.30pm and 7pm on weekdays" (pg.36). The GTA transport report identifies the peak periods for staff movements are 7am-7.30am and 3.30-6pm, which contradicts the City of Sydney LEP. Sydney Development Control Plan (DCP) 2012 Section 3.11 (as quoted in the EIS pg.37) refers to the provisions of the DCP pertaining to car parking. The DCP seeks to "discourage commuter car parking … or pertain to car parking as part of commercial or residential development". The proposal therefore contradicts the DCP.	The MSCP itself would not necessarily generate new traffic nor demand for parking, but rather alleviate existing staff demand for on-street parking. The proposal would not therefore actually encourage staff to drive private cars during the AM and PM peak periods. It merely formalises and redistributes them to a secure on campus location while reducing on-street parking related impacts. SLHD will continue to develop and implement travel demand management measures to discourage single driver, private vehicle use across the campus and particularly for staff. However, the primary aim of the proposed MSCP is to meet the current staff parking demand and to reduce the impact on the surrounding road network, particularly noting the recent reduction in supply associated with changes to adjacent car parks. It is also emphasised that DCPs are not a relevant matter for consideration in the assessment of a SSD application. There are also no DCP provisions applying to hospital developments in the Sydney LGA or specific built form provisions for the site.

	Key Issue Raised	Response
	It is acknowledged that hospital staff work shifts across a 24-hour period 7 days per week (24/7) and that public transport cannot cater for all of this. However, it is outlined in the EIS that the peak periods for staff travel are 7am-7.30am and 3.30pm-6pm - times when public transport is operating at its peak. During this period, public transport could and should be utilised by a majority of hospital staff in the precinct.	The provisions of the Sydney DCP pertaining to car parking either seek to "discourage commuter car parking", which is the primary consideration of this application, or pertain to car parking as part of commercial or residential development. Accordingly, the provisions under Section 3.11 cannot reasonably be applied to the development in any event.
	Operation A travel demand management (TDM) approach should be used to manage staff movements (which are more predictable than visitors) and provide transport for staff with car parking as a back-up rather than it being the primary means of access. One of the most effective TDM measures for achieving a mode shift away from private vehicles is to limit the availability of parking. It appears the actions proposed by the transport report are not consistent with the report's objectives.	While the aim of the MSCP is to meet current and future demand, it is noted that there will continue to be a shortfall of staff parking across the campus. As such, SLHD will continue to develop and implement travel demand management measures to discourage single driver, private vehicle use across the campus and particularly for staff. The campus also achieves a good travel mode split under current conditions.
	Alternative Modes of Transport The proposal does not contribute positively to a built environment that supports the health of the staff. The EIS states that "the proposed development will not adversely contribute to the operation of the surrounding road network, or public transport movements" (p.36). Given the site's close proximity to public transport, it is doubted that additional parking facilities are in fact required to ensure the efficient operation of this health facility.	As previously discussed, GTA's assessment identified an existing staff parking demand associated with the morning shift of approximately 1,700-1,800 vehicles based on a detailed assessment with consideration of the following: ▪ existing staff FTE including typical Visiting Medical Officers (VMO) ▪ breakdown across shifts ▪ proportion of staff who currently drive to work ▪ average vehicle occupancy. Given that there are approximately 900 off-street spaces available for use by staff, this equates to a shortfall of 800-900 spaces. On this basis, the proposed car parking supply of 996 spaces is suitable to accommodate this shortfall, as well as allowing for demand associated with the peak staff changeover and some of the anticipated future growth. Furthermore, the proposed MSCP would significantly help to mitigate the impact of staff parking within the local streets.
	Signage	
	It is recommended that the consent authority include conditions of consent to ensure adequate signage is integrated at all entry and exit points of the development to guarantee wayfinding for staff and the community.	Noted.

	Key Issue Raised	Response
Heritage Council of NSW		
	The following condition is recommended: *If any unexpected archaeological deposits/relics are discovered during the excavation works, the Heritage Council of NSW must be notified in writing in accordance with section 146 of the Heritage Act 1977 and work must cease in the affected area(s). Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.*	Noted.

	Key Issue Raised	Response
Office of Environment and Heritage		
	After reviewing the relevant documents, OEH's Greater Sydney Planning Team has concluded that the above matter does not contain biodiversity, natural hazards or Aboriginal cultural heritage issues that require a formal OEH response. We have no further need to be involved in the assessment of this project.	Noted.

PUBLIC SUBMISSIONS

	Key Issue Raised	Response
Submission No. 1 – Johanna Brown, Camperdown NSW		
	Points of concern: 1. increased traffic to small surrounding streets, 2. currently it is the only safe alternative as a cycle way 3. impact on Chinese embassy 4. removal of childcare centre without appropriate alternative, with ENORMOUS stress and disruption to children and families 5. enforcing the use of cars rather than improving public transport links to the hospital (making parking a cheaper alternative than public transport)	1. The results of the TIA indicate that most intersections will continue to operate within acceptable limits or similar to pre-development operation. This includes the key intersections on the periphery and along the Parramatta Road corridor. 2. Lucas Street is identified as being a 'bicycle friendly route' on the City of Sydney map. The proposed entrance to the MSCP is via Brodie Street with vehicular egress to both Church Street and Lucas Street. It is not considered to result in undue safety concerns for cyclists. 3. The proposed development will not adversely impact the operation of the Chinese Consulate or generate inappropriate results regarding privacy on the site. 4. An appropriate alternative has been provided for those children utilising the child care centre on site. SLHD negotiated an agreement with GELG. GELG undertook expansion of their services in order to accommodate the families from the LSCCC. The majority of families transitioned to the GELG centre at Camperdown, just 600 metres from RPAH. A small

Key Issue Raised	Response
	number have moved to other centres operated by Guardian, and a further small group have moved to other arrangements that better suit their needs, resulting in no net loss in child care spaces. The fees at GELG are comparable to those charged at the LSCCC. Two of the staff transferred to the Concord Hospital Child Care Centre whilst the all of the remaining staff have been offered employment by GELG. Staff have been given offers no less favourable than their current employment. 5. The MSCP is proposed to meet an existing and growing demand and as such does not in itself enforce the use of cars. Whilst, SLHD cannot directly improve public transport, it is investigating campus wide transport initiatives including a car pooling strategy. RPAH recently initiated a shuttle bus service between RPAH and Redfern Railway Station which runs at peak periods during the day and into the evening.
Submission No. 2	
My daughter's childcare centre is being demolished in order to build this carpark, which has not even yet been approved. I understand that a condition of approval was an alternative plan for the children. This did NOT occur, Children were pushed with 11 weeks' notice to a private-equity backed private provider which does not have enough places for all the children locally, is further away, preventing breastfeeding during work hours, and with an additional 10-minute walk in each direction (ie 40 minutes/day), and more expensive. The centre which we are encouraged to send our children to was recently closed due to lack of enrolments due to not meeting accreditation standards! In addition, I have a problem with the building of a 9 story carpark, public transport should be improved instead. Finally, I am not publishing my name due to concerns about bullying. After raising concerns, individual staff members were targeted by Teresa Anderson and her chief of staff Debra Wilcox and told that they were in breach of the NSW health code of conduct (which was not the case). Therefore, I am frightened for my job and employment in the future.	Refer to response above to Public Submission 1, issue 4.
Submission No. 3	
I strongly object to any removal of Nationally Accredited Childcare facilities in my local area, particularly when it is to be replaced with a car park. If the childcare centre is to be relocated, please ensure the service is able to remain open for the full duration of construction of a new premises, and then relocated into the new premises after construction is complete. Early childhood education is important to children's health and development, and essential for local families who rely on these services. This development is not in the best interests of the local community.	Refer to response above to Public Submission 1, issue 4.

	Key Issue Raised	Response
Submission No. 4		
	Quality local childcare that opens before 7am is hard enough to find. Closure of this service will hurt my family and our ability to meet our financial commitments. Please ensure that this childcare facility remains open, and if it is to move premises please ensure that the new site is built BEFORE the old site is turned into a car park.	Refer to response above to Public Submission 1, issue 4.
Submission No. 5		
	object to the development on this site because the hospital will be losing essential childcare services. Child care services are already overstretched in the Inner West. Although the hospital states that it has found childcare spots for children in another centre it is not yet clear that they will have capacity for all children. Families are being diverted from a not for profit childcare centre to a Profit childcare business. The hospital has said that they will build another childcare centre in 2 to 3 years but I feel strongly they should build that centre first as there is no guarantee that funding will be allocated for a new centre in 2 to 3 years time. The hospital undertook no consultation with stakeholders of the childcare centre prior to making these plans.	Refer to response above to Public Submission 1, issue 4.
Submission No. 6 - Sherrie Joseph, Camperdown NSW		
	Health	
	The ramp on the eastern side of the proposed car park is approximately 10 metres from the side of our house. Hundreds of cars arriving will disgorge fumes and particles into our windows on the side of our house, which are at approximately the same height as the ramp, and onto our balcony, thus requiring us to cease to use our balcony and to close our windows at all times. This problem will affect every house in the western end of Fowler Street. Each house is a terrace about 3 metres wide.	Operational noise impacts were discussed in the Acoustic Assessment prepared by Acoustic Logic, which accompanied the SSD application. This assessment has been further supported and updated, and accompanies this response at **Attachment F**.
	Overshadowing	
	No shadow diagram indicates the effect the 9 storey building will have on our solar enjoyment. If the current four storey building impacts our house during half of the year, then a 9 storey building will prevent our enjoyment of the short period of sun we get in the mornings on the side of our house and in the back yard.	Overshadowing diagrams were prepared by Cardno and accompanied the SSD application. While there may be potential overshadowing impact concerns on the neighbouring residents along Church Street, a more generous setback has been provided along the western boundary to lessen overshadowing and to reduce the sense of scale within the domestic scaled context of Church Street.
	Light Spill / Acoustic Impact	
	In the winter, cars using the car park early in the morning keep their headlights on while traversing the various floors. These lights will be continually shining in our side windows, requiring shutters of curtains to be closed. This problem, and the noise problem from cars queuing in the recently narrowed and improved Church Street will exacerbate the noise problem and the fumes/particle problems.	The potential impacts of light spill from the proposed development has been carefully considered during its detailed design: ▪ The perforations in the façade screens have a diameter of 10mm (rather than 75-100mm) and as such serve to limit the extent of light spill in the surrounding area. ▪ No parking bays have been located immediately adjacent or perpendicular to the southern façade. ▪ The major bulk of the building has been pulled back from the western boundary to reduce the impact on the residents of Church St. The entry and exit ramps have a solid 1200mm high barriers to reduce light spill from entering/existing cars.

	Key Issue Raised	Response
		▪ Solid panels are to be fixed to the crash barriers within the car park to further block out direct light. Operational noise impacts were discussed in the Acoustic Assessment prepared by Acoustic Logic, which accompanied the SSD application. This assessment has been further supported and updated, and accompanies this response at **Attachment F**.
	Design	
	This latter difficulty could be obviated by having a solid wall on the Church Street side of the building, rather than a lattice type front, and also by setting the ramp further back from the edge of Church Street.	The use of perforated screens on the façade assists with achieving the required 60% natural ventilation rate for the car parking structure and also creates visual interest and passive surveillance of the area for improved security. The detailed design of the proposed development has aimed to integrate the development with the surrounding area by stepping back the built form from Church Street to align with the QMB and provide a greater undeveloped area fronting this western boundary.
	The height of the building and the problems this will cause to our enjoyment of sunlight could be made less by putting at least some floors of the car park underground. There seems to be no difficulty in doing this as there is not rock to be dug out according to the report, and is mainly soft shale.	Consideration was given to mitigating the impacts on the QMB, including maximising the setback of the building, and minimising floor to floor heights to reduce as far as practicable the overall height of the building. Further excavation on the site to reduce the maximum height of the proposal was not feasible. It impacted entry to the MSCP, reduced natural ventilation at lower levels and in any case had marginal benefits to the overshadowing to QMB.
	CPTED	
	There is also the problem of skateboarders, who use the public car park further down to the south of the Queen Mary building during most nights, but especially on the weekend. They will no doubt be using this new building, with the associated noise. A security guard could prevent this from occurring.	The proposed car park will be monitored by CCTV cameras and will operate 24/7 to adequately provide for staff on the RPAH campus, thereby limiting the opportunity for unlawful activity on site.
	Operation	
	There is no need for such a large car park in this area. The public car park is never full. It would be a lot cheaper to subsidise the staff at RPA for their parking fees in the existing building.	The Proponent has undertaken detailed parking demand analysis for RPA staff and as outlined within the EIS and Traffic Impact Assessment, there is a clear demand for the proposal.
	It will be interesting to see how long the car park remains only for RPA staff and if when it becomes another commercial car park if that happens then of course the problems set out above become 24hour problems, 365 days of the year.	The MSCP is for the exclusive use of staff by RPAH.

Key Issue Raised		Response
Submission No. 7 – Colin Cook, Camperdown NSW		
	Air Quality	
	I am a resident of 14 Fowler street. I am 71 years of age and an asthmatic. The car exhaust fumes from the proposed car park will drift into my residence with an easterly or north easterly breeze. The balcony I use will be unusable.	The porous façade of the car park ensures that exhaust fumes do not exit the car park at a high concentration, but are dispersed through the entire façade. Winds from the east are rare in Sydney as can be seen from the wind rose in our wind assessment report. Additionally, the car park is shielded from winds from the east by the Marie Bashir Building. The recirculation behind the Marie Bashir building would lift exhaust fumes from the car park to higher levels rather than pushing them down to low levels of the residential buildings along Fowler Street. Winds from the north-east are frequent, however, these are summer winds primarily occurring in the afternoon. Winds from these directions would be pushing exhaust fumes through the porous façade of the car park and against the façade of the Queen Mary Building to the south. The setback of both the car park and the Queen Mary Building encourages the wind to disperse along Church Street, so the exhaust fumes are unlikely to impact residents on the northern side of Fowler Street for these wind directions.
	Acoustic Impact	
	The noise will be ever present…	Operational noise impacts were discussed in the Acoustic Assessment prepared by Acoustic Logic, which accompanied the SSD application. This assessment has been further supported and updated, and accompanies this response at **Attachment F**.
	Light Spill	
	The car lights early in the morning in the winter, and after dark, will shine directly into my bedroom window.	As discussed previously, the detailed design of MSCP has been developed to mitigate the potential for light spill on the surrounding area.
	Traffic	
	Church Street, newly narrowed, will not be able to cope with the extra traffic.	GTA have undertaken further modelling of the proposal, which has confirmed that most intersections will continue to operate within acceptable limits or similar to pre-development operation. This includes the key intersections on the periphery and along the Parramatta Road corridor.

	Key Issue Raised	Response
Submission No. 8 – Ness Rosayro, Lilyfield NSW		
	A car park over the need of a child care facility fails to meet the needs of RPAH workers as families. Whilst parking may be an issue, it is one which can be resolved through public transport and other transport options. Child care supports continued breastfeeding for women returning to work, flexibility, time and financial needs of women and men needing to return to work- I propose that a child care centre be built prior to the car park. This minimises disruption to families working at RPAH and demonstrates and support of family rights. The limited time frame provided to families and the inadequate responses of RPAH have been inadequate to say the least. It was delivered in a disrespectful manner with no consultation with the families and RPAH staff.	Refer to response above to Public Submission 1, issue 4.
Submission No. 9		
	It is disgraceful what RPAH executives are doing to their staffs. The executives have played their game well. Working on the anxiety-of parents who have only been given a mere 11 weeks to find childcare in the middle of the year. Not only are staff members worried about their children. They are anxious about getting to work as well. I believe there should be a better way. There are other lands which the executives refused to consider to build the carpark with the childcare incorporated to it. This current application is only for a car spaces of less than 1000. The old carpark holds 1500 and we have staff on 4 years waiting list. Please explain what will a 1000 car parking do? We currently pay a $7 per day for parking in a city area. It's not as if we do not have parking. And do explain who will lose out on their existing parking when the new carpark is built. I'm sure it's not the executives.	Refer to response above to Public Submission 1, issue 4.
Submission No. 10 – Graham Dowden, Camperdown NSW		
	Consultation	
	Project documents appear to have been issued without awareness of the City of Sydney Local Pedestrian, Cycling and Traffic Calming Committee or traffic calming measures implemented in Feb-Jun 2016. No mention of these measures was found in a search of documents downloaded from the Planning website. The Transport Impact Assessment includes the following mind-boggling statement: *I. 3 Stakeholder Consultation* *Stakeholder consultation has included discussions with the City of Sydney in March 20I 6 in relation to the traffic related impacts on the surrounding areas*. Plainly this consultation excluded the Traffic Calming Committee or anyone with knowledge of these works. As a result, certain information in the project documents is factually inaccurate.	The Proponent is aware of and has considered the measures in the design. The City of Sydney Council was consulted as part of the preparation of the SSD application.
	The proponent should engage with the City of Sydney Traffic Calming Committee and review all planned, currently implemented, and proposed traffic calming measures in the area.	Noted. The City of Sydney Council was consulted as part of the preparation of the SSD application.
	Traffic and Parking	
	Traffic Calming Measures The project documents are factually inaccurate. The former -1.2m wide bitumen footpath on Church St between Lucas and Grose St has been replaced by a 5.5m wide concrete footpath along the new Church St alignment, with additional garden bed corner extension of 7.5m. The old footpath width is incorrectly shown in Drawings DA-0101, DA-0102, DA-0207, DA-0209, DA-0310. Church St has been narrowed to about 75m and does not have a parking lane on both sides as incorrectly stated in the Transport Impact Assessment Section 2.2.1 "one traffic lane and one parking lane in each direction within an approximate l3m wide carriageway at the site."	GTA have undertaken further assessment of the newly introduced traffic calming measures, which have been addressed in the updated TIA at **Attachment B.**

<table>
<tr><th></th><th>Key Issue Raised</th><th>Response</th></tr>
<tr><td></td><td>The proponent should Re-survey all changed roads and footpaths and update all drawings accordingly.
Update all documents and drawings with changed roads and footpaths, including photographs, road widths, and observations.
▪ Repeat traffic surveys and assessments for current actual conditions.
▪ Conduct a site visit with all relevant project team representatives.
▪ Obtain vehicle use, occupancy and movement figures for the existing multi-storey carpark, and hospital ground carpark, in order to determine actual vehicle movements.</td><td></td></tr>
<tr><td></td><td>The proposal to discharge vehicles both north and south into Church St is completely contrary to the intentions of the City of Sydney Church St and Fowler St traffic calming measures.
<table>
<tr><th>Traffic Calming Intent</th><th>Contradiction</th></tr>
<tr><td>p1, para 11 "part of the City's commitment to calm traffic and improve residential amenity"</td><td>The proposal will increase traffic and reduce residential amenity.</td></tr>
<tr><td>p2, para 1 " The treatments will .. reduce vehicle speeds at the intersections."</td><td>The proposal will increase the number of vehicles using these slowed-down intersections.</td></tr>
<tr><td>p2, para 2 "The proposal will discourage the use of Church Street as an alternative short-cut route for traffic bypassing both Missenden Road and Mallett Street."</td><td>The proposal will use Church Street as an exit route from the MSCP.</td></tr>
<tr><td>p2, para 4 "Rubber speed cushions are proposed along the street to slow-down traffic."
Concrete speed humps have actually been installed.</td><td>Extra traffic from the MSCP will be slowed down.</td></tr>
</table>
<table>
<tr><th>Traffic Calming Intent</th><th>Contradiction</th></tr>
<tr><td>p2, para 6 "A Shared Zone .. would be installed in Fowler Lane."</td><td>Traffic will be discharged into Fowler Lane.</td></tr>
</table></td><td>An updated TIA has been prepared by GTA (Attachment B), which concluded that the proposed MSCP will not result in undue traffic impacts to Church Street as detailed within the additional modelling undertaken.</td></tr>
<tr><td></td><td>Western Exit
I object to vehicles crossing a 5.5m footpath into a narrowed street with a reduced vehicle turning curve on the grounds of functionality, pedestrian safety, and traffic flow.</td><td>An updated TIA has been prepared by GTA (Attachment B) in response to the matters raised during public exhibition of the application.</td></tr>
<tr><td></td><td>Construction Traffic and Parking
The CMP incorrectly asserts that the impact of traffic and parking will be minimal. From actual observations of previous construction projects in the area this is fanciful.</td><td>An updated TIA has been prepared by GTA (Attachment B) in response to the matters raised during public exhibition of the application.</td></tr>
</table>

Key Issue Raised	Response
<table><tr><th>Construction Management Plan</th><th>Objection</th></tr><tr><td>9.2 Construction Traffic "Road network impacts will be mitigated by the fact that construction workers generally start earlier and finish earlier than the commuter peak periods, and would likely **not coincide** with the hospital peak periods."</td><td>Incorrect. Peak construction traffic periods **coincide with** the 6:30am to 7:30am AM peak hospital staff period stated in the Transport Impact Assessment [Section 2.3].</td></tr><tr><td>9.2 Construction Traffic "Construction workers driving to sites in constrained parking environments such at RPAH with a nearby train station **typically carpool** – further reducing the impact on the road network."</td><td>Incorrect. A consistent observation from all previous development is that trades people who bring anything other than minimal hand tools drive vehicles. They **do not** catch public transport or car pool.</td></tr><tr><td>9.2 Construction Traffic "construction traffic .. volumes are expected to be low and in the order of 50 vehicles per day. .. the potential temporary **impacts are anticipated to be minimal**."</td><td>Incorrect. 50 vehicles per day parking in the surrounding streets will have a **very significant impact** on resident parking unless off-street construction traffic parking is provided. Church St does not have many more than 50 parking spaces.</td></tr><tr><td>9.3 Parking "**Minimal (if any) on-site parking will be provided** for construction traffic due to physical site constraints for amenities, scaffolding and materials handling and local traffic conditions."</td><td>An astonishing omission. "Local traffic conditions" are the very reason that off-street parking **should be** provided. The 1.2 ha Vacant Lot two blocks from the construction site could accommodate every construction vehicle and the site office.</td></tr></table> I very strongly object to no off-street parking being provided for construction traffic. I strongly urge the proponent or contractor to negotiate with the owner of the large Vacant Lot (Macquarie International Health Clinic) to rent part of the land as a construction yard with sufficient parking, office, washing, loading and al1 other facilities for all vehicles for the entire duration of the project.	
EIS Documentation	
There is also a contradiction between project documents. The Transport Impact Assessment Figure 6.1 and Figure 6.2 show traffic discharge into Church St to both north and south, whereas the Site Analysis Plan NA80813231-DA-0101 shows traffic discharge into Church St only to the south.	An updated TIA has been prepared by GTA (**Attachment B**) in response to the matters raised during public exhibition of the application and has been amended to clarify the vehicle direction movements into Church Street.
Proposed Location	
A cursory examination of the site context begs the question of why the new MSCP was not planned on the site of the existing Ground Carpark. Compared to the existing Ground Carpark, the proposed location has the following problems: ▪ Traffic crossing pedestrian paths from Queen Mary building students, and pedestrians (Transport Impact Assessment, Fig 6.1, Site Analysis Plan D101) ▪ Increased distance from major feeder roads (Missenden and Carillon) ▪ Increased traffic impact on surrounding roads (Church, Lucas, Fowler) Transport Impact Assessment, Fig 6.1, Site Analysis Plan D101 ▪ Does not use existing boom gate and traffic flow to Missenden Rd and Carillon Ave traffic light exit	The existing car park provides 600 spaces currently allocated to staff with access via Grose Street (though noting that the rates charged by the private operator significantly exceed the Ministry fees policy and as a result, these spaces are poorly patronised by staff). In the short term, a further 427 spaces are currently available to staff and visitors in the existing multi storey car park, but are subject to public parking fee rates, meaning there will be minimal staff use. These 427 spaces are not, however, available for future use given their allocation to the private hospital. Accordingly, the existing car park site would not meet the parking needs of RPAH staff and is not a viable alternative.

Key Issue Raised	Response
▪ Further from hospital buildings ▪ Creates an additional separate parking precinct ▪ Has a 2000m2 smaller land area: 5500m2 vs 7500m2 ▪ Does not adjoin with proposed new private hospital on Vacant Lot	The existing on grade car park is part of the future Master Plan for the RPAH campus. This space will be needed in future years for expansion of clinical services and has been ruled out for use as the site for a multi storey car park. This decision was based on planning, which included community consultation, undertaken in 2012 and is designed to meet the future clinical needs of the local and wider community serviced by RPAH
Submission No. 11 – Macquarie International Health Clinic Pty Ltd	
Use of New Hospital Road	
New Hospital Road was only ever intended as a private road that was borne out of an agreement between SLHD and Macquarie. The extract below has been lifted from the Construction Deed dated 2 December 1996 between SLHD (Landlord) and Macquarie (Tenant): *"The following provisions relate to access and New Hospital Road:* *a) The Landlord has warranted in the Car Park Lease and Hospital Lease that the Land will have pedestrian and vehicular access to and egress from land and roadways held by it.* *b) The parties agree that if the Tenant wishes to construct a road along the boundary of Lot 2 in DP 805666 where thot Lot 2 is continuous with Lots 1L and L2 in DP 809663 between Carillon Avenue and Grose Street, it may do so to a standard agreed between the parties.* *c) The cost of constructing New Hospital Rood and, subject to sub-clause (e), the maintenance costs associated with the New Hospital Road, are to be borne by the Tenant.* *d) The Landlord ogres to grant to right of way over that part of Lot 2 in DP 805666 upon which the New Hospital Rood is constructed in favour of Lots 1.1. and 1.2 in DP 809663. The terms of the right of way may include such provisions as the Landlord may reasonably require to maintain the integrity of the campus of the Royal Prince Alfred Hospital and otherwise give effect to the principles relating to the development of the campus of Royal Prince Alfred Hospital set out in clause j.5 of this deed and in the Landlord's site masterplan as published before the dote of this deed. All reasonable costs incurred in relation to the creation of that right of way must be borne by the Tenant.* *e) The tenant agrees, if requested by the landlord, to allow the landlord access to and use of the New Hospital Road but only for loads for which is has been designed to carry. The Landlord agrees to contribute towards, in proportion to its usage (including having regard to weight loadings of traffic) of the New Hospital Road (but in any event not exceeding 50% provided the Landlord complies with loading limits), the maintenance costs of the New Hospital Rood. If the parties cannot agree on the proportion to be paid by the Landlord the dispute will be determined by an independent traffic consultant selected by the Landlord who will act as on expert and not as an arbitrator."* Clause (b) describes Macquarie's right to construct New Hospital Road and Clause (e) requires the Landlord ("SLHD") to obtain the Tenant's ("Macquarie") consent for access to and use of New Hospital Road. To date,	Fundamentally, compliance with the Construction Deed is a private matter and will to any necessary extent be dealt with by SLHD and Macquarie outside the SSD application process. Without in any way limiting this fundamental position, the Proponent has been informed of the following: • NHR will remain a 'private' road on RPAH land. Whilst it is not a public road, it does cross the west campus of RPAH from Carillon Avenue to Lucas Street (including the link road from the existing private hospital car park on Grose St past the Marie Bashir Centre and the proposed MSCP to Lucas Street) and therefore it is natural that it will be used by vehicles arriving from both the north and south at several destinations on the west campus. • Macquarie has been aware of SLHD's proposed use of NHR for many years, particularly in respect of the concept plan for the west campus that SLHD shared with MIHC in 2014. The concept plan indicated use of NHR for the currently proposed MSCP on Lucas Street for staff parking, a future courtyard building on the site behind KGV (existing on-grade visitors' car park) which will have visitor basement parking. The proposed use of the road is consistent with the lease provisions quoted by MIHC in its response, including 'to maintain the integrity of the campus of RPAH'. • The use of NHR by staff cars entering and leaving the staff car park is consistent with the loads for which NHR has been designed. The private hospital car park, using NHR since 2000, includes many hundreds of RPAH staff and many of the staff who will park in the MSCP are existing staff who park somewhere in the vicinity of RPAH and currently generate traffic and parking loads. Vehicle weights will be similar, volume and frequency of usage

	Key Issue Raised	Response
	SLHD has sought no such consent.	(and therefore maintenance implications) will need to be considered and of course, as indicated below in GTA's report, any necessary modifications to intersections (including the signalised Carillon/NHR intersection) to facilitate the MSCP traffic will be reviewed with the RMS.
	Traffic	
	Following our review of the Application, we believe that there will be excess use of New Hospital Road beyond its contemplated design and significant congestion at key intersections. New Hospital Road was only ever intended to serve the Existing Staff Carpark and Private Hospital. The Existing Staff Carpark is approved for 1,225 spaces. Therefore, the addition of 996 spaces from the Proposed MSCP is a significant burden to the existing load. As a result of the increased traffic due to the Proposed MSCP, there are numerous major intersections that will experience significant increases in traffic volumes and congestion. These include: i. Carillon Ave/New Hospital Road ii, Carillon Ave/Missenden Rd ii¡. Carillon Ave/Church St iv. Carillon Ave/Mallet St v. Missenden Rd/King St vi, Missenden Rd/Parramatta Rd	GTA's updated assessment at **Attachment B** confirms: *As discussed throughout, the signalised intersection of Carillon Avenue/ Grose Street will need to accommodate a significant proportion of the proposed multi storey car park traffic. Naturally, there would be impacts to the function and operation of this intersection as a result of the proposal, especially when considering the cumulative impacts of this proposal and the private hospital. That said, the private hospital would also see the majority of the AM peak arrivals after 8:00am and certainly on the edge of peak generation associated with the proposed multi storey car park. The mitigations to impacts on the intersection are likely to only require line marking and removal of kerbside parking in order to maintain an acceptable intersection level of service.* These potential modifications are illustrated in Figures 6.3 and 6.4 within GTA's statement. The specific need or otherwise for any such intersection modifications would need to be investigated further, with any such implementation to be determined in consultation with RMS. Fundamentally, issues concerning the intended use and load bearing of the private road are private matters and will to any necessary extent be dealt with by SLHD and Macquarie outside the SSD application process. Without in any way limiting this fundamental position, the Proponent has been informed of the following: The clause of the Construction Deed quote by Macquarie in its submission does not establish that "was only ever intended to serve the Existing Staff car park and Private Hospital". To the contrary, subclause "(e)" demonstrates that future use by RPA was clearly envisaged, hence the anticipated sharing of maintenance costs. In fact, Link Road between the existing private hospital car park, which would service more than the private hospital, was part of Macquarie's approved conditions of consent for the development of the private hospital in 1997. Further, the DA approved in 2002 for a

	Key Issue Raised	Response
		1000 space multistorey car park behind KGV (replaced by the current MSCP proposal on Lucas Street) on the eastern edge of NHR, included access off NHR and Carillon Avenue. Hence it is not logical to argue that NHR services only the private hospital. SLHD's 2013 concept plan for the west campus proposes that Lucas Street be converted to two-way from the existing east-bound one way. This is quite feasible and dates back to traffic planning for RPAH with South Sydney Council and the City of Sydney over many years. It would see current parking on the southern kerb of Lucas Street removed, which is of course sensible given that many of those on-street parkers are staff who currently cannot get access to an off-street secured car park on the west campus, but will once the MSCP is opened. Access to the MSCP from the east and west on Lucas Street would reduce traffic on NHR from Carillon Avenue and funnel traffic off Missenden Road before it reaches the congested stretch of road in front of RPAH.
	The addition of a further 996 car parking spaces in the Application is predicted to cause unwarranted congestion on New Hospital Road which will have a flow on effect on to the local street network. This network includes Carillon Ave, Church St, Missenden Road, Mallet St and possibly Parramatta Rd and King St all of which have an impact on the access to and from the Royal Prince Alfred Campus for patients, visitors and staff. The traffic flow data is evidence of existing congested conditions that are experienced during an extended peak period that lasts, on average through the week, from 7:30am to 6:30pm. This encompasses all of the typical AM and PM peak times as well as early commuter peak, school peaks, shopping peak and general commuter peak periods which occur throughout the entire day.	In addition to the above responses, further modelling conducted by GTA confirms that *"intersections continue to operate within acceptable limits or similar to pre-development operation. This includes the key intersections on the periphery and along the Parramatta Road corridor."*
	NSW Ambulance Service The increased congestion may also cause undue pressure on ambulance access to the Emergency Department of Royal Prince Alfred Hospital located off Missenden Rd. There must exist the presumption that any ambulance approaching Royal Prince Alfred Hospital from the South will be slowed and may be critically delayed by the congestion during the AM and PM peak times. We query why GTA Consultants, in compiling the TIA, has not addressed this critical aspect of what is one of the Australia's busiest Emergency Departments and why, New South Wales Ambulance Service has seemingly not been approached as one of the key stakeholders.	As identified in the amended Traffic Assessment (**Attachment F**), during construction, the Principal Contractor will ensure that there is no disruption to emergency vehicles on public and internal Hospital roads. The sites location, well distanced from emergency services and departments associated with RPAH, will ensure any potential impacts on emergency access would be able to be effectively managed throughout the works. With regard to impact on the Emergency Department during the operation of the car park, the vehicle exits are distributed across the network and are accommodated by direct north south connections to/ from the regional road network. There will be some increase in traffic movements along Church Street, Lucas Street and a short section of Fowler Street in the afternoon when staff would be exiting the MSCP. However,

	Key Issue Raised	Response
		the staff shift finish times tend to have a greater spread in the afternoon than in the morning, thus mitigating this impact as much as practical. Also critical to the arrival and departure routes is recognition of the existing emergency vehicle travel paths and the need to maintain these at all times. It should be noted that these traffic routes are also already used by RPAH staff given existing parking arrangements and the current preference in many instances, for staff to park on-street along the surrounding local streets where parking is either unrestricted, or for night shift workers, where night-time parking is unrestricted. The car park construction will not affect ED or the ability of ambulance to enter the ED. As RPAH is an inner city campus, congestion is an issue, however the car park will ensure staff are allocated spaces on campus, reducing the number of staff attempting to secure limited street parking, which is contributing the current congestion in the area.
	Baseline Traffic Volumes Traffic counts undertaken as part of transport assessment demonstrated the road network peak hour was between 7.45amto 8.45am. However, the traffic modelling undertaken to support the development has considered traffic volumes on the road network between 6.30am to 7.30am, as it has been assumed this time coincides with the peak traffic generation of the new car park. It is important to note that there is a significant difference in road network conditions during these two separate time periods. Based on the traffic counts provided in the GTA report, between 6.30am and 7.30am traffic volumes at key intersections in the vicinity of the site are approximately 25% less than those observed between 7.45am and 8.45am. The fact that the traffic modelling has been based on traffic volumes observed between 6.30am and 7.30am, well outside of the road network peak hour, results in intersection performance levels which are not reflective of that during the road network peak hour.	The survey data indicated that the road network peak hours were between 7:45am and 8:45am, and 4:30pm and 5:30pm. With consideration for the above, it is noted that these peak hours do not specifically coincide with the peak RPAH staff activity periods, nor traffic associated with the proposed MSCP. This is particularly the case during the morning period when the majority of staff driving to work typically arrive for the start of the daytime shifts prior to 8:00am. Specific descriptions of these staff shift times and arrival peaks are detailed in Section 6 of this report. With this in mind, this assessment has taken a conservatively high approach by adopting an AM peak between 7:00am and 8:00am, and a PM peak of between 4:30pm and 5:30pm. Refer to the updated TIA at **Attachment B**.
	Traffic Generation As previously noted, the traffic modelling undertaken to support the development has assumed the car park generates the majority of its traffic between 6.30am to 7.30am in the morning peak period. Arup has obtained data from Macquarie Health Corporation relating to the current profile of demand generated by the existing multi-storey car park immediately south of the site. Figure 3 illustrates the profile of traffic demand accessing the existing multi-storey car park over a typical day in July 2016. The values indicated represent net traffic movements (entrances less exits) over each hour of the day.	An updated TIA has been prepared by GTA (**Attachment B**) in response to the matters raised during public exhibition of the application.

	Key Issue Raised	Response
	This profile indicates the busiest time period in terms of vehicle movements (both in and out) of the car park is between 8am and 9am - coinciding with the road network peak hour previously identified. Between 6am and 7am, which encapsulates half of the site peak hour assumed by GTA, only a small number of net vehicle movements was recorded.	
	Cumulative Traffic Impacts On l9 June 1997, the Land and Environment Court approved a development application for the construction of a 200 bed Private Hospital - immediately south of the existing multi-storey car park. Based on rates provided in the RMS Guide to Traffic Generating Developments, this private hospital would generate in the order of 185 vehicle trips during the AM peak hour. The traffic assessment undertaken for the proposed car park has not considered the future levels of traffic associated with this private hospital development.	While at present the private hospital approved in 1997 has not been constructed, the updated TIA at **Attachment B** has taken into consideration the traffic expected to be generated by the private hospital.
	Traffic Modelling It has been demonstrated that the traffic modelling undertaken for the proposed multistorey car park has not proper considered the full traffic impacts associated with the project, given: ▪ The profile of traffic activity accessing the existing multi-storey car park demonstrating peak activity occurring between 8am and 9am; ▪ Significantly higher traffic volumes observed between 7.45am and 8.45am compared to those used in the modelling (6.30am to 7.30am); and ▪ The failure of the assessment to consider future traffic volumes associated with the approved private hospital development. It is therefore considered that the traffic modelling results indicated in the traffic assessment do not accurately represent the likely operation of key intersections in the vicinity of the site. In particular, the operation of the Carillion Avenue / New Hospital Road intersection, as well as the Carillion Avenue / Missenden Road intersection, are likely to operate at levels beyond that indicated in the traffic report.	An updated TIA has been prepared by GTA (**Attachment B**) in response to the matters raised during public exhibition of the SSD application 7542.
	Car Parking Capacity	
	The Existing Staff Carpark's latent capacity comprises both unused existing capacity and approved but unbuilt capacity. Neither of these has been considered in the Application. As noted above, Macquarie took back possession of the Existing Staff Carpark on 2 November 2015. At the time of handover of the carpark, records indicate that there were L,000 car parking events per day with a register of approximately 2,000 users. As at the date of writing this submission, the Existing Staff Carpark continues to experience no significant change to the utilisation and demand ratio based on car parking events of 1,000 per day and 2,000 access cards issued to RPA staff. This level of utilisation represents only 60%-70% of the capacity of the Existing Staff Carpark and incorporates the peak volumes during shift changeovers. Therefore, 30%-40% of the Existing Staff Carpark's capacity, equivalent to approximately 300-400 spaces, remains available for use. This has been misrepresented in the TIA in section 2.6.2.	The revised TIA included at **Attachment B** concludes the following in relation to the requirement for car parking on site: *Several car parking areas are available within the RPAH precinct providing staff parking supply of 300 spaces, plus 77 visitor spaces and 70 spaces dedicated for use by fleet vehicles. 600 spaces are currently allocated to staff in the main existing multi storey car park south of the site with access via Grose Street (though noting that the rates charged by the private operator significantly exceed the Ministry fees policy and as a result, these spaces are poorly patronised by staff). In the short term, a further 427 spaces are currently available to staff and visitors in the existing multi storey car park, but are subject to public parking fee rates, meaning there will be minimal staff use. These 427 spaces would not however be available for future use given their allocation to the private hospital.* Accordingly, this existing car park would be utilised by the private hospital in the future and that any short term under-

	Key Issue Raised	Response
	In addition, the incremental approved but unbuilt 199 parking spaces of the Existing Staff Carpark, DA 097-00153, also needs to be considered. Activating the construction of these parking spaces would provide sufficient capacity on the Royal Prince Alfred Campus for the required parking demands that include the peak 'shift change over' scenario.	utilisation would be taken up by public parking and staff prepared to make public level payments (in excess of Ministry fees policy). *On the above basis, while there are approximately 900 off-street spaces available to RPAH staff, patronage levels would be a fraction of this amount.* *Furthermore, NSW Health assessed the need for provision of a staff only multi storey car park within the RPAH campus. The assessment identified an existing staff parking demand associated with the morning shift of approximately 1,700-1,800 vehicles based on a detailed assessment with consideration of the following:* ▪ *existing staff FTE including typical Visiting Medical Officers (VMO)* ▪ *breakdown across shifts* ▪ *proportion of staff who currently drive to work* ▪ *average vehicle occupancy.* *Given that there are approximately 900 off-street spaces available for use by staff, this equates to a shortfall of 800-900 spaces. On this basis, the proposed car parking supply of 996 spaces is suitable to accommodate a portion of this shortfall, as well as allowing for demand associated with the peak staff changeover and some of the anticipated future growth.*
	This submission has already addressed the latent capacity of the Existing Staff Carpark. The Existing Staff Carpark offers 1,026 available spaces to RPA staff. This includes a guaranteed minimum 600 staff spaces and access to the remaining 426 spaces. This has been misrepresented in the TIA in section 2.6.2 on page 14 where it notes: "It is understood that this car park was once heavily utilised by RPAH staff though recent modifications by on adjacent landowner has effectively resulted in a reduction in the availability of parking supply for use by staff. This has resulted in on even greater shortfall in staff parking within the precinct." As noted in section 7 above, Macquarie has not observed any noticeable reduction in staff parking volumes at the Existing MSCP, Therefore, the above statement is not correct.	There has been no misrepresentation by the TIA. While at present the private hospital approved in 1997 has not been constructed, the private hospital/ car park operator has asserted that it is only obliged to provide 600 spaces at staff rates. It must be assumed that the car spaces in the Grose Street private hospital car park will be utilised by the private hospital in the future and that any short term under-utilisation will be taken up by public parking. In order to meet the demands of the local and greater community on the clinical services of RPAH, additional parking is required.
	Existing DA On 11July 2002, South Sydney Council approved DA U99-00551, which relates to the construction of a 1,000 space car park on the parcel of land located immediately west of the KGV Building. The combination of the car spaces contemplated in the Application plus DA U99-00551would result in an additional 1,996 parking spaces. The traffic impact of an additional1996 spaces in an already congested area will be significant. There has been no assessment of the impact of this combined incremental volume of parking spaces in the Application, Given the scale of the proposed developments, the Application should consider DA U99-00551in the TIA assessment.	Concepts for the future use of the RPAH campus and the traffic in the area have changed since the consent was granted for DA U99-00551 in 2002. The health demand of the local & greater community on the clinical services of RPAH has been assessed by NSW Health and will increase over the next 5-10 years due to the increasing level of urban infill. A concept plan developed by SLHD has earmarked the current on grade car park as a development zone for clinical services, not a car park.

	Key Issue Raised	Response
		Further, it is our understanding that the DA referenced has lapsed. Whilst any development on this site will include a small number of car parks, this will be to service the patients & visitors attending the facility not staff parking.
	The Proposed MSCP be reduced to a maximum of 300 car spaces, the traffic impact of which would be lower and more sustainable given the existing levels of congestion in the subject area, particularly Carillon Ave, Missenden Rd and Church St.	No change is proposed to the required number of parking spaces set out in the SSD application.
	Pedestrian Network	
	We also believe the incremental traffic intended to be directed onto New Hospital Road poses a major safety concern for pedestrians. For instance, the 800 bed student accommodation in the Queen Mary building, located across from the Existing Staff Carpark, generates significant pedestrian flows to and from the University of Sydney. The increase in traffic will create an almost impassable barrier that will require the installation of a mechanical pedestrian management system to ensure the safe passage of staff, patients, students and the general public. The installation of the required pedestrian management system will further burden traffic flows along New Hospital Road and Carillon Ave, amongst others.	Established pedestrian paths (>2m) are provided on both sides of Missenden Road, Parramatta Road and Carillon Avenue in the vicinity of the site. Narrower footpaths are also provided along Lucas Street and Church Street (generally in the order of 1 to 1.5m wide), which provide direct connectivity between the site and the RPAH and University of Sydney campus. Church Street has also recently been upgraded to provide much wider footpaths in key locations, particularly adjacent to the site and on either side of Lucas Street. This has also improved pedestrian amenity and the level of north-south connectivity. Several pedestrian crossing points (provided in the form of zebra crossings and signalised crossings) are located on Missenden Road, Parramatta Road and Carillon Avenue. The pedestrian footpaths on Lucas Street and Missenden Road, as well as the zebra crossing provided on Missenden Road south of Lucas Street, provide a direct pedestrian connection between the site and the main RPAH buildings. The total walking distance between these two locations via this route is in the order of 350m, or approximately 4-5 minutes' walk. Given the student housing within Queen Mary building, the east-west connections across the RPAH precinct (and Grose Street) is a key link given the main hospital location and Sydney University further to the east. The zebra crossings, Brodie Street shared zone (delivered as part of the Marie Bashir Centre) and sightlines along Grose Street facilitate an adequate level of pedestrian safety within the campus. Nevertheless, the Proponent has been informed that: • SLHD is conscious that beyond the current MSCP proposal (due to the future construction of the private hospital, the planned development of a new clinical building behind KGV and the proposed Research Building on Missenden

	Key Issue Raised	Response
		Road at between Grose and Lucas streets), there is likely to be greater pedestrian traffic between the west and east of RPA campus, including across NHR. • SLHD will consider a pedestrian crossing at the intersection of Grose Street (adjacent the Queen Mary Building) and NHR in the future subject to traffic patterns and pedestrian movements having been confirmed.
	Site Location	
	Missenden Rd currently bisects the Royal Prince Alfred Hospital campus, separating the main hospital from the vast majority of other services offered on the campus. It is clear that the direction and egress of traffic in the Proposed MSCP will create a second major division on the campus. This will result in similar problems to those currently experienced with Missenden Rd in yet another area of the RPAH campus. It does not make sense to unnecessarily introduce another line of division on a major health campus when other traffic routes are available.	An updated TIA has been prepared by GTA (**Attachment B**) in response to the matters raised during public exhibition of the SSD application 7542. NHR does not have any similar effect (as suggested) with Missenden Road and RPAH. NHR already exists, extending from Carillon Avenue to Lucas Street, and any pedestrian and vehicular issues arising can be managed with appropriate traffic management devices.
Submission No. 12 – Jim Donovan, Lindfield NSW		
	The NSW Department of Planning and Environment is remiss if it approves this application, which is a travesty of 21st-century town planning. Inner suburbs like Camperdown should rely on public transport; large carparks are unwelcome. I am aware that NSW has policies to develop public transport and also to develop roads including Westconnex. These policies are contradictory. There should be no roadbuilding or large carparks in such a dense area. Instead, policies should apply travel demand management I attach a copy of a travel demand management plan for Perth which was released by the Western Australia government last week. It looks forward to Perth's population reaching 3.5 million. Sydney reached that figure some time ago; our policies should be ahead of Perth's rather than behind. I comment the Perth plan to your attention.	Noted.
Submission No. 13 – Action for Public Transport (NSW) Inc Company		
	The site is too valuable As remarked in the EIS, the hospital is expanding, providing more services to a growing population. The proposed staff car-park site could be used to provide medical facilities now or in the future. The site should not be wasted on car parking. Other inner-Sydney hospitals (St Vincents, Balmain and Sydney) are constrained by space and heritage considerations. RPAH can do better.	The demonstrated demand for additional staff car parking cannot be serviced in any alternative location within the RPAH Campus.
	Building a car park would encourage private car use Sydney should be managing travel demand by smart transport and land-use planning. Building 996 staff car spaces, each of which would turn over perhaps 4 cars every 24 hours, would see many thousand car trips daily in the surrounding streets.	The proposal largely represents a redistribution of traffic that is already travelling to/ from the area, rather than 'new' vehicle trips per se. The intersections in the immediate vicinity have however, been assessed adopting a conservatively high approach by assuming all site generated traffic are 'new' trips.

	Key Issue Raised	Response
		This approach is recognised by both City of Sydney and RMS and has been a key component as part of this assessment.
	Strategic oil reserves Australia has little or no strategic petroleum shortage and electric cars remain very expensive. In the event of a supply disruption, Sydney would quickly be in serious trouble. It is short-sighted to encourage car usage without guaranteed fuel.	Noted.
	The cost of driving In Australia we no longer manufacture motor vehicles or refine petroleum in Sydney. This has a big impact on our terms of trade over $800 per head per year.	Noted.
	Staff car parking charges The $21 per week staff parking charge is an anomaly when you consider staff who travel by public transport receive no subsidy. With parking costs for private parking ranging from $15 up to $50 daily not far away, why should public transport users pay more than drivers who use more resources?	Noted.
	Public transport should be provided instead In the short term, a 7-day shuttle bus service should run between the hospital and Redfern station. That or another bus should service Newtown Bridge. Adequate steps should be taken for security between the hospital and the Parramatta Rd bus stops near Missenden Road. Small low-floor buses might be suitable. Frequency of service is vital - at least 6 buses/hour 5am-11pm with more capacity at busy times. Also, the route of bus 370 (which used to pass very near the hospital) should be examined. Many staff would find it useful to restore the RPAH service. In the longer term, there should be underground Metro rail stations near trip generators like RPAH. Oddly, Sydney Metro plans no stations between Central and Waterloo. Metro railways worldwide tend to have stations spaced about 1km apart. A western metro line from the CBD could have stops at UTS Broadway, Fisher Library, RPAH, Annandale etc.	The Proponent has been informed that SLHD is continually investigating campus wide transport initiatives including a car pooling strategy. RPAH recently initiated a shuttle bus service between RPAH and Redfern Railway Station which runs at peak periods during the day and into the evening. The service has been well patronised and will be monitored and services expanded should its use continue to grow.