

## State Significant Development Response to Submissions



10 Herbert Street, St Leonards

Hospital

Submitted to Department of Planning and Environment  
On Behalf of Ramsay Health Care

September 2016 ■ 14653



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## Executive Summary

The Environmental Impact Statement (EIS) in support of the State Significant Development Application (SSDA) for the development of a hospital at 10 Herbert Street, St Leonards was publicly exhibited between 14 July and 29 August 2016.

Five submissions were received in response to the public exhibition of the EIS, with all submissions made by government agencies and authorities and none by the general public. The key issues raised in submissions can be broadly grouped into the following categories:

- Built form;
- Stormwater; and
- Construction traffic.

The proponent, Ramsay Health Care, and its expert project team have considered all issues raised within the submissions made pursuant to the requirements of the *Environmental Planning and Assessment Act 1979*.

A considered and detailed response to all submissions made has been provided within this report at Section 2.0 and further expanded upon within the accompanying documentation. Final measures to mitigate the impacts associated with the refined proposal are detailed at Section 3.0.

In conclusion, the development of the site for a hospital provides an opportunity to deliver a much needed item of social infrastructure which together will provide essential services to the surrounding community.

## 1.0 Introduction

The Environmental Impact Statement (EIS) in support of the State Significant Development Application (SSDA) for the development of a hospital at 10 Herbert Street, St Leonards was publicly exhibited between 14 July and 29 August 2016.

Public exhibition occurred in accordance with the requirements of the *Environmental Planning and Assessment Act 1979*.

Five submissions were received in response to the public exhibition of the EIS, as follows:

- Government authorities and agencies - 5;
- Members of the public – 0.

The proponent, Ramsay Health Care, and its specialist consultant team have reviewed and considered all issues raised.

This report, prepared by JBA on behalf of the proponent, sets out the responses to the issues raised in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000*, and details the final project design and final Mitigation Measures for which approval is now sought.

The key issues raised in submissions can be broadly grouped into the following categories:

- Built form;
- Stormwater; and
- Construction traffic.

This report provides a detailed response to each of the above issues and outlines the proposed amendments to the exhibited Environmental Impact Statement. Where individual issues are not discussed in this report, a detailed response can be found in the tables at **Appendix A**.

The following consultants' information further supplements the material originally submitted in support of the EIS:

- Architectural letter;
- Stormwater letter; and
- Construction Traffic Management Plan.

The revised supporting documentation enables the Department to undertake an informed assessment of the amended proposal.

A final schedule of the mitigation measures proposed to mitigate the impacts associated with the proposed works is provided at Section 3.

This report should be read in conjunction with the EIS prepared by JBA, dated June 2016, as relevant.

## 2.0 Key Issues and Proponent's Response

This section of the report provides a detailed response to the following key issues raised by the Department, government agencies and authorities, and the general public during the public exhibition of the SSDA:

- Built form;
- Stormwater; and
- Construction traffic.

### 2.1 Built Form

Willoughby City Council's submission notes that the proposed L-shaped built form provides a visually interesting forecourt, however concern is raised with the proposed articulation to the south eastern and south western boundaries. It is requested that consideration be given to a podium - tower built form.

A tower would result in a smaller floorplate with increased separation from the boundaries, however a smaller floorplate is not appropriate for the operational requirements of a hospital. The size and arrangement of the proposed floorplate has been carefully designed to ensure an appropriate relationship between nursing staff and patients. Amending this relationship may facilitate an amended built form outcome, but would result in significant operational difficulties for the hospital.

The careful selection of materials and finishes and the proposed layout of windows ensure that the rear facades of the building are visually interesting and appropriate for the site's context.

A detailed response to the built form issues has been prepared by STH, the project architects (refer **Appendix B**).

### 2.2 Stormwater

Willoughby City Council's submission contended that the stormwater management plans submitted with the application are inadequate and inaccurate. This submission has been reviewed by the stormwater consultant, Acor Consultants, who have provided a written response (refer **Appendix C**). Relevant extracts of this letter are reproduced below.

*The stormwater drainage management plan submitted for the development site, allows for all stormwater drainage from the site to be directed through an on site detention (OSD) system before discharging to the Council stormwater drainage network. This meets Councils requirements as specified in the Willoughby Development Control Plan (WDCP) Attachment 24 - Stormwater Design Elements and Attachment 25 On-Site Detention.*

*The OSD has been designed to discharge to the existing interallotment stormwater pipe that traverses the site to the benefit of the property upstream. A separate DA application has been made to Council, as stated above, to divert this existing pipe to suit the proposed development footprint.*

*The design intent is to upgrade the existing interallotment stormwater drainage as part of these works to allow the OSD to connect to this system without exceeding the capacity of the network. Any overflow from the OSD tank discharges to the kerb in Frederick Street as per Council requirements.*

*A Hydraulic Grade Line analysis and OSD design has subsequently been completed since the initial application and confirms that there will be no additional runoff from the site to either Councils stormwater drainage or to downstream properties as a result of the development.*

*The initial submission was also accompanied by an Overland Flow Study completed by ACOR. The report concludes that the development is not subject to flooding from overland flow from Frederick Street and will not impede the passage of floodwater to cause a rise in water upstream of the property.*

## 2.3 Construction Traffic

Transport for NSW raised concern with potential conflicts between the construction of the proposed development and the use of the adjoining road network for rail replacement buses in 2018. It should be noted that the current construction program has the building completed in December 2017.

A Construction Traffic Management Plan has been prepared by SBMG (refer **Appendix D**). This details the proposed development, existing traffic conditions and proposed traffic management. The plan specifically responds to the potential issues in relation to rail replacement buses raised by Transport for NSW, including:

- Cumulative impact of site activity with other construction sites;
- Road safety at key intersections;
- Anticipated peak hour and daily truck movements;
- Temporary cycling and pedestrian access;
- Construction vehicle access; and
- Proposed construction impact.

## 3.0 Final Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 1** below. These measures have been derived from the assessment described in this report and the Environmental Impact Statement (including appended consultants' reports).

**Table 1** – Mitigation measures

Mitigation Measures
<p><b>Construction Management and Construction Traffic Management</b></p> <ul style="list-style-type: none"> <li>▪ A final Construction Environmental Management Plan, incorporating a Construction Traffic Management Plan, is to be prepared after the appointment of a head contractor but prior to the commencement of works on the site</li> </ul>
<p><b>Acoustic Impacts</b></p> <ul style="list-style-type: none"> <li>▪ The recommended noise control measures within the Noise Impact Assessment prepared by Wilkinson Murray and the draft Construction Environmental Management Plan prepared by Richard Crookes Constructions will be incorporated into the detailed design of the proposed development.</li> </ul>
<p><b>Nuisance Water Ingress</b></p> <ul style="list-style-type: none"> <li>▪ The recommended nuisance water ingress measures within the Overland Flow Study prepared by ACOR Consultants will be incorporated into the detailed design of the proposed development.</li> </ul>
<p><b>Sustainable Travel Choices</b></p> <ul style="list-style-type: none"> <li>▪ A location specific Travel Plan and Access Guide is to be prepared prior to the occupation of the development. The objectives of the plan are to be as follows:               <ul style="list-style-type: none"> <li>– To promote a high modal share for public transport, cycling and walking journeys;</li> <li>– To ensure adequate facilities are provided at the site to enable staff and visitors to commute by sustainable transport modes;</li> <li>– To facilitate the sustainable and safe travel of new employees;</li> <li>– To raise awareness of sustainable transport amongst patients, staff and visitors.</li> </ul> </li> </ul>

## 4.0 Conclusion

The proponent, Ramsay Health Care, and its expert project team have considered all submissions made in relation to the public exhibition of the hospital development at 10 Herbert Street, St Leonards. A considered and detailed response to all submissions made has been provided within this report and the accompanying documentation.

The environmental impacts of the proposal, including traffic generation and car parking, acoustics, contamination and geotechnical matters, stormwater drainage and construction are negligible or can be appropriately managed through normal conditions of consent and the implementation of the mitigation measures identified in Section 3.0 of this Response to Submissions.

Given the positive impacts and public benefits delivered by the proposal and in the absence of adverse impacts, we have no hesitation in recommending that this SSDA be approved.