

ETHOS URBAN

Response to Submissions

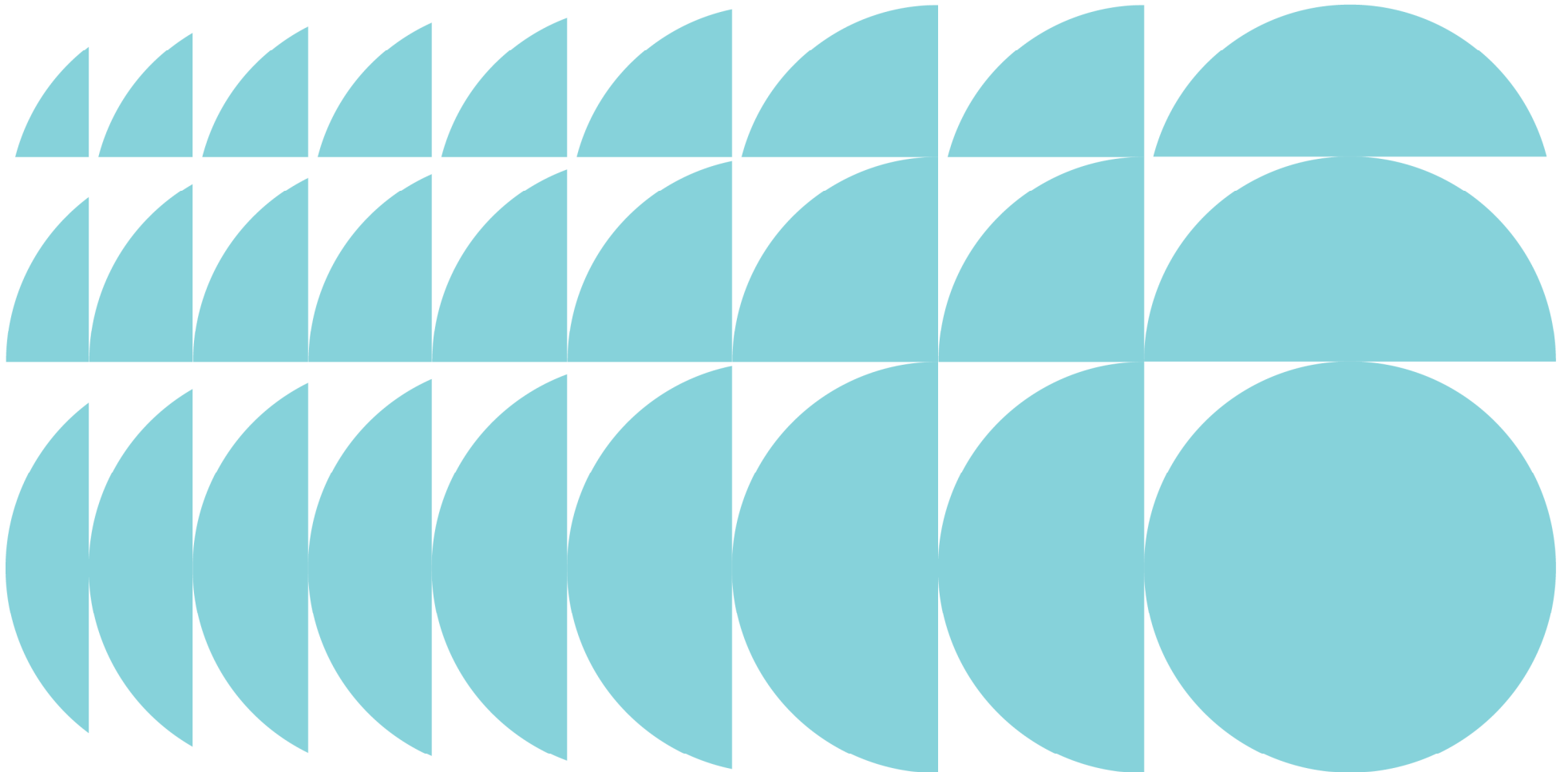
Precinct 4A, RNSH

St Leonards Health Organisations Relocation
(SHOR)

Submitted to Department of Planning &
Environment

On behalf of NSW Health Infrastructure

19 June 2018 | 16611



1.0 Response to Submissions Table

Issues Raised by Agencies and Organisations		Proponent's Response
Department of Planning & Environment		
Subdivision		
The proposed subdivision boundary alignment must be amended so it is clear of the south-eastern corner of Building 36 (i.e. deletion of proposed Lot 42). Alternatively, evidence must be provided demonstrating how Building 36 will comply with the Building Code of Australia at the boundary between proposed Lot 40 and Lot 42.		- Lot 42 is to be created as per the application and the attached plan (Attachment A). - Building Code of Australia compliance for Building 35/36 will be achieved via the creation of additional easements upon Lots 41 & 42 to ensure that all BCA requirements can be achieved by Building 35/36 - The details of these easements will be provided prior to registration of the subdivision.
View Loss		
An assessment of the potential view loss impacts generated by the proposed development is to be undertaken, particularly the impacts on existing residents located in unit buildings in Herbert Street.		- An assessment of the potential view loss impacts generated by the proposed development on the existing residents located in units on Hebert Street has been prepared by BVN and is submitted with this table at Attachment B. - As illustrated in the BVN response, the western view from the upper levels of residences along Herbert Street is towards the greenery of Gore Hill Oval across the rooftops of aging low-rise building on the RNSH campus, and is bordered by the red brick building 36 to the north and 207 Pacific Highway to the south. - The new development is located in the centre of that view. - On the lower levels (level 11) the view of the greenery is partially obscured; however, visibility is maintained either side of the building, and the sky view is not obstructed. - On the upper levels (level 21), there is distant views to the Parramatta River. These views are maintained over the rooftop of the new development. Greenery surrounding Gore Hill also remains visible.
Statement of Commitments – Herbert Street Pedestrian Bridge		
As you are aware, there is a Statement of Commitment (SoC) in the concept plan approval requiring the Herbert St Pedestrian Bridge to be upgraded prior to the occupation of <u>any</u> building within Precinct 4. In your RtS you have argued that the bridge upgrade will be done in any future development of Site 4b (adjacent to Herbert Street), which seems logical, however the concept plan still restricts occupation of the proposed Site 4a building. Can you please clarify how you intend on addressing this?		The Statement of Commitment made in the Concept Plan is as follows: REALIGNMENT OF HERBERT STREET PEDESTRIAN BRIDGE The proponent will realign the existing pedestrian bridge over Herbert Street to create a more direct, level and obvious pedestrian route between the railway station and the Precinct 4 Plaza. The pedestrian bridge footpath level will be maintained at about AHD 81 and the Precinct Plaza will have a typical level of around AHD 81.5 to permit easy level access between the two. Timing: Details of the proposed bridge realignment are to be submitted with the project application from Precinct 4, and the works completed prior to the occupation of any building in precinct 4.

Issues Raised by Agencies and Organisations	Proponent's Response
	- While Precinct 4 comprises Precincts 4A and 4B, HI is of the view that the commitment can be met in respect to a development application on Precinct 4B rather than Precinct 4A and therefore it does not impact on this application. The reasons for this are set out below. - HI acknowledge that the wording of the Commitment is unfortunately imprecise, particularly as it has never been contemplated that there will be a single development application that is 'the project application from Precinct 4'. Rather, both the concept plan as initially submitted (in section 7.13) (Original Concept Plan) and the Amended Concept Plan and Preferred Project Report (in section 7.14) (Preferred Project Report) envisaged that Precinct 4A would be developed in Stage C, separately from Precinct 4B which will be developed in Stage D. In light of this, the statement is ambiguous as to whether the Commitment intended that details of the bridge realignment be submitted with <i>any</i> project application from Precinct 4 or, rather, the relevant project application to which the bridge relates. Clearly the logical intention would be 'for the relevant project application to which the bridge relates'. HI's reasons for this are: - The Original Concept Plan and the Preferred Project Report describe the bridge realignment as part of Stage D (which covers Precinct 4B): <i>Stage D includes ... the eastern half of Precinct 4 ... If developed in isolation of Stages C and E, all components of this stage will be fully accessible via Yellow and Red Roads, the realigned Herbert Street pedestrian bridge and the existing alignments of Reserve Road and Herbert Street.</i> - In contrast, there is no mention of the bridge realignment in relation to Stage C (which covers Precinct 4A). - As the Response to Submissions report in the current SSD Application notes, both the Original Concept Plan and the Preferred Project Report include drawings that show a pedestrian bridge across Herbert Street that links the Forum with Precinct 4B, but not directly with Precinct 4A. - In any event, the connection proposed by the current application achieves the intent of the commitment as it aligns with the RLs identified in the statement and provides access from the Railway to Precinct 4. - On that basis, HI is of the view that the proposal meets the intent of the commitment to the extent possible with the development of Precinct 4A and that the permanent realignment of the bridge can be achieved in respect to the development of Precinct 4B as was originally intended.
Noise	
<i>The background noise monitoring that informed the Construction Noise Management Plan and Operational Noise and Vibration Report submitted with the application was not undertaken in accordance with the Noise Policy for Industry. That is, the noise monitoring was not undertaken at the nearest sensitive receivers and does not appear to have acquired the minimum 'weeks' worth of valid monitoring data unaffected by climatic conditions.</i>	- Additional background noise monitoring has been commissioned by NSW Health Infrastructure to be undertaken in accordance with the <i>Noise Policy for Industry</i> as requested as part of the Department's assessment of the Environmental Impact Statement. - Renzo Tonin Acoustic Consultants have updated the Construction Noise Management Plan and Operational Noise and Vibration Report having completed additional noise monitoring (submitted at Attachment C).

Issues Raised by Agencies and Organisations	Proponent's Response
- Background noise monitoring is to be undertaken in accordance with the Noise Policy for Industry and the submitted Noise Management Plan and Operational Noise and Vibration Report are to be revised accordingly (if required as a consequence of the further monitoring). - Details of the incorporation of the recommended acoustic treatment measures into the southern and eastern sides of the rooftop plant area must be provided, noting the submitted Operational Noise and Vibration Report recommends the installation of a 6.3 m tall acoustic screen, which if installed would result in a building exceeding the maximum permitted height.	Proposed mechanical and refrigeration plant located on the roof of the development has been identified as main source of noise impacts to existing surrounding residential and commercial premises. Details of noise and vibration mitigation measures has been provided in updated report to ensure that plant equipment will not either singularly or in total emit noise levels which exceed the day or night time noise limits defined by EPA Industrial Noise Policy. These measures outlined by the acoustic consultant to mitigate impacts from the mechanical and refrigeration plant can be appropriately conditioned.
Roads and Maritime Services	
Roads and Maritime notes that the trip generation should be calculated as per the GFA (Gross Floor Area) of the development site, not the reduced parking (267 as opposed to 96 parking spaces used for trip generation calculation in the report provided). It is understood that there would be a considerable volume of drop off & pick up trips related with the development.	- Ason Group have prepared an additional response to the matters raised by RMS (Attachment D). - The estimation of trip generation based on GFA is not appropriate for the Proposal as it would represent an unrealistic overestimate of traffic. The trip generation methodology for the Traffic Impact Assessment was calculated on a Trip per Parking Space rate for commercial/office-based parking and based on the number of children for the proposed childcare centre (as recommended by the RMS guide) which would account for the main pick-up and drop-off demands for the Site. - As outlined within the attached statement, the trip generation methodology remains the most appropriate estimation method for the Proposal.
The traffic modelling should consider cumulative traffic impact from the other currently proposed developments including Tower-B at 12 Frederick Street (corner of Reserve Street/Frederick Street) to understand the cumulative traffic impact from the overall precinct and mitigation measures required (if any) to mitigate any potential impact in the surrounding road network including Pacific Highway due to the proposed developments.	- Ason Group have prepared an additional response to the matters raised by RMS (Attachment D). - It is noted that Tower A was considered as part of the cumulative impact assessment in the TIA report. - As detailed within the response prepared by Ason Group, the forecast traffic demands arising from the Proposal and the 12 Frederick Street development are minor and can be adequately accommodated within the road network.
Roads and Maritime would require the SIDRA modelling files for review. The SIDRA model should include existing base model, future base model (with 10 years growth), future base model with development. The SIDRA model should be undertaken, calibrated & validated as per Roads and Maritime's Traffic Modelling Guideline..."	- Ason Group have prepared an additional response to the matters raised by RMS (Attachment D). - The requested SIDRA modelling files have been submitted for review and demonstrates that the forecast traffic demands arising from the Proposal and the 12 Frederick Street development are minor at the above-mentioned intersections and would be adequately accommodated within the road network.

Issues Raised by Agencies and Organisations	Proponent's Response
Willoughby City Council	
Health Administration building use	
<i>Council supports commercial development in St Leonards however remains of the opinion that a commercial building should be located within the surrounding substantial supply of commercially zoned land. Likewise, hospital land should be used for hospital related clinical purposes.</i>	• HI acknowledges Council's view the land that is subject of this application should be used for "hospital" uses. However, it is important to recognise that under the Concept Plan (MP 06_0051) the subject site within Precinct 4 was never intended to be used for clinical purposes; <i>'Precinct 4 shall be developed for employment generating land uses and may include residential and temporary accommodation'.</i> • Further, the decision by the Minister for Planning to declare the proposed development as State Significant Development was done on the basis of a thorough investigation by the (then) Planning Assessment Commission (PAC) which took into account the proposed uses approved in the Concept Plan and the need for additional clinical space. This process concluded that the proposal was appropriate and on that basis declared it to be State Significant.
Vacant section of Precinct 4 adjacent Herbert Street - referred to as Site 4b	
<i>The potential loss of a pocket park (2,900m²) from the hospital site is considered to be an important issue, as the provision would positively contribute to the amenity of hospital patients and staff as well all users of the RNSH site generally. It is requested that a direct and satisfactory response be provided to this important issue.</i>	• As mentioned in earlier responses to both Willoughby Council and DPE, commitment to provide a pocket park in Precinct 7 is no longer considered appropriate as the land use within that Precinct is clinical space and not residential as originally proposed. It should be noted that HI has never committed to providing a pocket park within Precinct 4 and therefore this application does not include one.
Temporary residential accommodation	
<i>In line with the abovementioned concern with the Concept Approval process, Council raised concern in its submission dated 16 March 2018 the importance of providing temporary accommodation on the RNSH site. In the Concept Plan, this was to be in Precinct 4 and 5.</i> <i>No objection is raised by Council to the location of temporary accommodation on site 4b within Precinct 4, as well as Precinct 5. It is noted that under the existing conditions of approval, temporary accommodation will make up approximately 50% of GFA on site 4b. It is requested that a direct and satisfactory response be provided to this important issue.</i>	• As advised in response to the issued raised by Willoughby Council as part of Modification 7 to the concept plan, temporary accommodation is already being provided within the Douglas Building on site and this is meets the current demand for this type of accommodation. There is potential opportunity on Precinct 4B and/or 5 to provide temporary accommodation, however this does not form part of the proposal under consideration. • Health Infrastructure has no plans to develop Precinct 4B or Precinct 5 at this stage.
Impact on Gore Hill Oval and Park	
<i>The importance of Gore Hill Oval and Park should not be underestimated, as it plays a critical open space and amenity role for the overall RNSH site as well as the immediate locality and wider region. The relationship between the western side of Reserve Road and any development on the eastern side must be managed carefully.</i> <i>The Modification to Precinct 4A should consider any impacts on Gore Hill Oval and Park, being an adjacent important open space area, as follows:</i>	• An assessment of the potential impact of the proposal on Gore Hill Oval and Gore Hill Park has been prepared by BVN in relation to visual impact, solar access impact and landscaping; submitted with this table at Attachment B. • The new development is visible from across Gore Hill Oval, and sits comfortably within the heights established by 207 Pacific Highway. The significant mature trees that border the oval along Reserve Road provide a landscaped green base to view. • Shadow diagrams of the new development were submitted with the original submission and as illustrated in the response at Attachment B, the new development has no impact on Gore

Issues Raised by Agencies and Organisations	Proponent's Response
<i>The visual impact of any building in Precinct 4A, including reflectivity. An architectural response regarding how the building has been designed should be provided to address this concern.</i> <i>Solar access impacts. In this regard an analysis should be provided at mid-winter.</i> <i>Whether the landscaping on Precinct 4A positively contributes to the landscaping on Gore Hill Oval and Park, and in particular that adjacent Reserve Road (being a major entry point to the Hospital site). It is considered that an opportunity exists to improve the visual quality of this highly utilised area.</i>	Hill Oval at any time throughout the day during the summer solstice or the equinox in March and September. In mid-winter, the impact is minor along the eastern edge of the oval in the morning (9am) and has no impact from approximately 11am onwards. As a direct response to comments from the Government Architect, the interface of the building to the public domain has been improved through the use of a broad shallow stair, opening the colonnade to the street, giving is a more appropriate frontage as an urban building with hundreds of visitations throughout the day. The previous triangular shaped garden bed has been changed in shape and improved since the original submission to increase its depth to better suit significant planting as shown at Attachment B.