

21 December 2018

Ms Teresa Gizzi
Senior Planner
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Teresa

**SSD 9113 PRINCE OF WALES HOSPITAL (POWH) REDEVELOPMENT STAGE 1 –
REQUEST FOR ADDITIONAL INFORMATION**

I refer to your email of 6 December 2018 requesting additional information on a number of issues raised by your team and other agencies in respect to the above.

In response to the Department's request, Health Infrastructure (HI), wishes to reiterate that this SSDA is the first step in realising the NSW Government's vision to strengthen the Randwick Health and Education Precinct as it delivers strong social, environmental and economic benefits. Universities, hospitals, medical research institutions and tertiary education facilities are significant contributors to Greater Sydney's economy and precincts like Randwick are a key component to the Greater Sydney Commission's Metropolis of Three Cities plan. The importance of the precinct was outlined in HI's Request for Secretary's Environmental Assessment Requirements (SEARs) and further reinforced in the Environmental Impact Statement (EIS) prepared on HI's behalf by Advisian.

In that context, the SSDA:

- a) Reflects the stated vision of the Randwick Health Collaboration partners (HI, Randwick City Council and University of New South Wales (UNSW)) as outlined on page 2 of the EIS.
- b) Responds to the projected growth that is creating pressure on existing facilities to provide critical health services at a level and quality expected by the community.
- c) Recognises the extensive and detailed master planning that confirmed that expansion within the former Hospitals' Campus was not possible.
- d) Responds to the SESLHD's Asset Strategic Plan's primary objective to expand the Prince of Wales Hospital to meet contemporary models of care needs.

- e) Responds to the need to include research and education and optimise research capabilities with the adjoining University of New South Wales (UNSW) to the west and allow room for broader university engagement.
- f) Facilitates the creation of the proposed integrated models which require a fundamental change in land use, form and scale of development in the locality including changes to its context and setting, including the natural and built environment.
- g) Has been developed in consultation with the local community and health consumers. There has been, and continues to be, a substantial communication and engagement program as evidenced in the Communications and Engagement Consultation Report in Appendix X to the EIS. The Report clearly sets out the direct communications with the immediate neighbours, residential, hospital, university and research institutes.

HI is keenly aware of the substantial changes to the area being brought about by the Precinct's evolution, including those relating to this application. These changes will have both short and long term effects on the wider community and local residents.

Of importance is the commitment by all precinct partners to enhance the urban environment for the local community, the staff, patients, families, students, researchers and visitors. The agreed design principles for the precinct include creating a healthy and green environment, integrating with the local community and natural environment, being responsive to the local community and the history of the area and connecting within and outside the precinct.

In addition, HI has worked with the design team to minimise the impacts of the changes. One such example was HI's decision to relocate the Acute Services Building 25 metres to the north of the site to mitigate the extent of overshadowing, with 25 metres being the maximum distance the building could be relocated without significantly compromising the vital clinical linkages to the existing operational hospital.

HI is committed to taking all reasonable and feasible steps necessary to minimise disruptions to stakeholders. Inherent in this commitment is the understanding that the SSDA constitutes a part of a key strategic initiative of both State and Local Government, health care and service providers as well as health educators and researchers in partnership with the University of New South Wales.

HI and all precinct partners are committed to achieving greater sustainability in terms of transport, particularly facilitating mode shifts in private /public transport habits by optimising transport usage and minimising reliance on private vehicular transport. A significant investment in public transport in the form of light rail has been made for the Precinct and this is seen as a catalyst for this shift occurring. The Green Travel Plan developed for the campus will also assist in meeting this outcome.

It is noted that the Applicant and its traffic consultant Arup is consulting directly with Roads and Maritime Services (RMS) regarding the proposed intersection upgrade. On 13 December RMS confirmed that, subject to standard Roads and Maritime conditions, the proposed signalised intersection on Botany Street was supported 'in-principle'. RMS

confirmed that they would formally respond via the Response to Submissions (RTS) process confirming this.

Detailed responses to all the issues you have raised are attached in **Attachment A**.

Should you require any clarification or further information, please contact Leone McEntee at NSW Health Infrastructure on (02) 9978 5420 or 0410 432 505.

Yours faithfully,

Cathryn Cox PSM
A/Chief Executive

ATTACHMENT A – CONSOLIDATED RESPONSES

Noise/Layout

In order to reduce impacts on Magill Street residents, the Applicant and the SESLHD have agreed to maintain the closure of Magill Street to through-traffic. This change to the EIS is expected to reduce additional traffic along Magill Street by 74% (Arup, December 2018, **Attachment B**), resulting in a significant reduction in noise levels and improved acoustic amenity for the residents of Magill Street. Furthermore, given the location of the emergency department access points along Magill Street, additional traffic will only impact half of the residential properties along Magill Street.

With respect to Emergency Department access off Magill Street, it should be noted that the Ambulance NSW is committed to reducing the unnecessary use of lights and sirens. In accordance with NSW Ambulance Policy (2014), the use of warning devices is mandated when any ambulance vehicle is responding to a case that is triaged as requiring an urgent response. The advice from the Emergency Department of Prince of Wales Hospital is that urgent cases make up approximately 48% of the workload across the state. Overwhelmingly patients are treated and transported at normal speed to hospital. A small minority of the sickest patients are transported urgently to hospital with the use of warning devices. Although the Prince of Wales Hospital does not capture the actual data, it is considered to be a very small minority of patients that fit into this transport option, estimated at around 1%.

As a consequence of the closure of Magill Street and to ensure ambulances have an alternative access in the event of an emergency, the Applicant proposes installing automated or manually controlled bollards to the eastern end of Magill Street. These bollards will remain raised at all times except in the event of an emergency where access/egress to the west is blocked. The exact specification and extent of these bollards will be developed in consultation with Ambulance NSW.

To further reduce noise impacts for Magill Street residences (in addition to the closure of Magill Street), the Applicant confirms its commitment to the following mitigation measures:

1. Installation of road and site signage to alert users of the need to minimise traffic/people noise impacts to neighbouring areas.
2. Restriction on the loading dock hours of operation so that operations are limited to daytime hours only (7:00am to 6:00pm). *Note: this is proposed despite acoustic advice that assesses that the predicted worst-case maximum noise levels are caused by traffic on Magill Street, not the loading dock i.e. once traffic is on the Campus it does not exceed the Sleep Awakening limit (Acoustic Logic, December 2018, **Attachment C**).*

With respect to the loading dock's proximity to Magill Street residences, in addition to the Applicant's commitment to restricting the loading dock hours of operation, the Applicant wishes to note the following:

- Loading dock access/egress will be via Hospital Road only.
- The restriction on loading dock hours of operation will eliminate night time noise. This solution has been proposed in lieu of a roof structure to the loading dock that would only have reduced night time noise.
- Section 6.2.1.3 of the Noise and Vibration Impact Assessment assesses that the perimeter wall around the loading dock will provide effective acoustic screening between loading dock activities and upper storey residences. With the wall provided, noise emissions from the satellite loading dock meet the NSW NPI noise emission criteria and sleep awakening criteria at the upper storey of the residences located on the opposite side of Magill Street at all times and, therefore, at all residential and other noise-sensitive receivers.

Please refer to the attached Arup letter dated 21 December 2018 (**Attachment B**) and Acoustic Logic letter dated 21 December 2018 (**Attachment C**) which sets out the expected improvement in traffic and acoustic impacts associated with the closure of Magill Street.

Overshadowing

The Applicant understands the key agencies' concerns about the overshadowing on properties 7 – 15 Magill Street and has made efforts to mitigate the impact during the design phase by shifting the Acute Services Building 25m to the north. This is the maximum distance the building could be relocated without significantly compromising the vital clinical linkages to the existing operational hospital.

The Applicant also wishes to provide further comment on the extent of overshadowing created by the Acute Services Building to ensure it has not been misunderstood by the agencies. The Applicant assesses that, as per the information contained in Section 7.3 of the EIS, impact on the minimum 3-hour solar access to living areas (as prescribed in the RCC DCP) is marginal. With further reference to Section 7.3 of the EIS, the Applicant notes that 11 out of the 12 properties already do not meet the prescribed 3-hours of sunlight to private outdoor space due to shadows cast by existing buildings. Therefore, any form and massing redesign of the Acute Services Building would have only marginal impact on living areas and would not resolve the existing lack of solar access to private outdoor space. Therefore form and massing redesign is not recommended.

Further, it should be acknowledged that the Acute Services Building has been declared State Significant according to Clause 14 of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP); and therefore, pursuant to Clause 11, the solar access provisions of a DCP do not apply to the SSD. However the Applicant understands the importance of protecting the amenities of affected residents and to the best of their ability and efforts tried to relieve the solar access issues by moving the Acute Services Building north.

Bicycle Parking, Networks and Infrastructure

A bicycle user group has been established to inform the design for an end of trip facility to be located within the existing Randwick Hospitals Campus car park. It has been relocated from the proposed Acute Services Building to increase its size and to make it a more central facility to service the Campus.

The Applicant remains committed to working with Council to ensure the site of the Acute Services Building is compatible with Council's plans to develop a high quality cycling route within the development site and hospital campus that links to the proposed Route 5.

Further, the Applicant has prepared an updated Green Travel Plan (**Attachment D**) that addresses Council's suggestion to place the hospital campus at the centre of the bicycle network map (to better inform people wanting to access the site from all sides) and updates existing bicycle network map (on page 14) to include the whole area around the site and hospital campus. The Applicant also confirms that the proposed cycle network shown at Figure 8 in the GTP has been sourced from RCC's website and shows RCC's proposed cycle network.

Sustainability

Sustainability Rating

The Applicant makes reference to the matters as detailed in the RTS Report on pages 18, 33 and 34. The Applicant did consider a 5-star equivalent rating however the Applicant seeks to maintain a consistent approach to sustainability rating targets and initiatives across its portfolio. In this regard, the commitment to a 4-star equivalent rating represents an appropriate response to the Applicant's design and cost (construction and operation) requirements.

The proposed Acute Services Building strives to attain strong sustainability outcomes while operating as a world-class medical facility. These two goals will end on common grounds such as:

- Achieving real cost-savings through energy/water efficiencies, and redirecting the savings to improved patient care;
- Improved patient experience and staff motivation/productivity by building a naturally lit and healing indoor environment; and
- Minimising environmental impacts through appropriate construction methods (recycled materials etc.).

To further improve upon this outcome to achieve a 5-star equivalent rating, challenges will be faced economically. The key link between a 4-star and 5-star rating for the Acute Services Building lies in forgone opportunities to reduce Greenhouse Gas Emissions, which has scored 5 out of 20 in the Green Star Rating assessment. These opportunities require a

high level of capital investment and increased maintenance costs typically accompanied with new technologies:

- Renewable energy systems such as photovoltaics were considered in the initial design phase, however a payback period beyond 5 years on a limited budget meant that the option was not adopted.
- Roof space allocation has been provided to accommodate for photovoltaics once economically feasible in the future.
- Trigeneration systems or cogeneration systems are costly facilities which will substantially improve the energy efficiency and carbon footprint of the Acute Services Building, and thus help achieve a 5-Star. However, the payback periods for these systems are also too long to justify investment.

It is therefore to be acknowledged and understood by the key agencies that HI faces the challenge of balancing the importance of enhancing sustainability initiatives with improving medical facilities and equipment to meet world-class standards on a limited budget.

Cool Roofs

The Applicant agrees to include cool colours for building roofs.

ESD Initiatives

Details on the proposed ESD initiatives to achieve the targeted sustainability rating is outlined in the Sustainability Schematic Design Report (**Appendix J** to EIS). A sustainability checklist is attached alongside.

Rainwater Harvesting

The option to utilize the harvested rainwater from the OSDs for irrigation of landscaping will be assessed and developed during the detailed design phase.

Landscape

A Tree Retention and Removal Plan and detailed landscape plans have been prepared and are provided in **Attachment E**. The Applicant has taken on board OEH's feedback on diversity, maturity and density of trees, shrubs and groundcover and proposed an improved solution which balances landscape amenity within the budget constraints of the project.

To further enhance the habitat at the site, the Applicant will also commit to providing a range of artificial nest boxes for native fauna.

The Applicant explored opportunities to salvage existing native trees marked for removal for incorporation into the final landscaping solution however this was not deemed feasible from a programme, safety and logistical perspective.

The Applicant reiterates that it (and not the NSW Government Architect) is working on a 'tree-replacement strategy' for the Randwick Hospitals Campus Redevelopment Project (the Project).

As noted on page 12 of the RTS Report:

"The Applicant has committed approximately 200 trees to be considered for planting both within the Precinct and across the Randwick local government area in the coming years. Consultation with Council is being undertaken on their possible location."

In collaboration with Randwick Council, the Applicant aims to maximise the number of trees from the proposed 200 noted above to be incorporated in the extensive soft landscaping proposed for the Project, creating an attractive and much needed green space for the benefit of the local community, hospital users and staff.

Parking

In relation to on-site parking, the Applicant has and is demonstrating that it is making a serious attempt to effect and manage change to the behavioural patterns of community attitudes to transport modes. This is reflected in the development Green Travel Plan (GTP) and the ongoing consultation with Randwick Health and Education Precinct (the Precinct) stakeholders. Further, it is considered that a whole of Government responsibility/partnership response is required (and not just the Applicant alone) to effect change beyond the Precinct, given it was the NSW Government's decision to create it in the first instance.

Archaeology

Since the submission of the EIS and the RtS, Mary Dallas Archaeology and Casey and Lowe Heritage Archaeologists have been engaged to undertake preliminary testing and monitoring as part of the remediation works approvals provided by Randwick City Council. Final reports relating to the site are attached at **Attachment F** (Historical Archaeology) and **Attachment G** (Aboriginal Cultural Heritage Assessment) and to date no relics of interest have been located.

An application under Section 140 of the Heritage Act 1995 (S140/2018/035) has been submitted and is under consideration by the Heritage Office. Similarly, an Aboriginal Heritage Impact Permit (AHIP) has been submitted to cover the work in the event that Aboriginal cultural heritage is located on site.

Sydney Light Rail Project – Flooding Impact

As noted on page 36 of the RTS Report, significant and frequent coordination is occurring between the Applicant and the Sydney Light Rail Project teams to manage construction interfaces and potential cumulative impacts.

The TfNSW recommendation is accepted by the Applicant.

Construction Worker Transportation Strategy

The TfNSW recommendation to prepare a Construction Worker Transportation Strategy is accepted by the Applicant.

Construction Traffic and Pedestrian Management

The TfNSW recommendation is accepted by the Applicant.

Construction Noise and Vibration

Refer to pages 15, 23 and 24 of the RTS Report which discusses the justification for the proposed construction hours and proposed mitigation measures.

Site Area

DP&E require that the Applicant advise the total area of the site. The total site area for the SSDA is 21,312m²

Survey Plans

A survey plan for the existing residential lots located along Botany Street, Eurimbla Avenue and Magill Street is provided at **Attachment H**.

Architectural Plans

Sections for the bridge connections were provided in Appendix D to the EIS. The bridge connections are also included in the relevant elevation drawings submitted in Appendix E of the RTS Report.

ATTACHMENT B – ARUP TRANSPORT LETTER (21 DECEMBER 2018)

ATTACHMENT C – ACOUSTIC STUDIO LETTER (21 DECEMBER 2018)

ATTACHMENT D – GREEN TRAVEL PLAN (19 DECEMBER 2018)

**ATTACHMENT E – TREE RETENTION AND REMOVAL PLAN AND DETAILED
LANDSCAPE PLANS**

**ATTACHMENT F – HISTORICAL ARCHAEOLOGY REPORT (CASEY & LOWE,
DECEMBER 2018)**

**ATTACHMENT G – ABORIGINAL CULTURAL HERITAGE ASSESSMENT (MDCA,
OCTOBER 2018)**

ATTACHMENT I – RESPONSE TO COUNCIL’S CONDITIONS

Condition no.	Subject	RCC Response/Comments	Applicant Response
TRAFFIC CONDITIONS			
9	Dedication of land along Botany Street.	Council notes that the applicant is investigating the viability of land dedication for a shared pathway along the Botany Street site frontage. Council reaffirms the need for the dedication and recommends the condition should remain as unchanged.	Applicant agrees to continue working with RCC during design finalisation to confirm viability of a shared pathway.
REQUIREMENTS BEFORE A CROWN CONSTRUCTION CERTIFICATE CAN BE ISSUED			
14	Prior to lodgement of a Construction Certificate the applicant must submit to Council for approval	The applicant objects to the timing for satisfying this condition. Providing the requirements of the condition are maintained an alternate timing could be considered. All documents would need to be prepared and approved prior to the commencement of any works on the new drainage system.	Noted / Agreed
16,17	The drainage strategy / stormwater design	Council cannot accept the proposed amendment. Council has consistently maintained that it will take ownership of the diverted pipeline however all additional infrastructure (e.g. the compensatory onsite detention system required to deal with the proposed blockages to predevelopment overland flow paths) must remain under the care and control of the applicant.	Drainage / stormwater is the subject of a separate REF approval for which the Applicant will finalise the design and resolve maintenance and ownership issues in consultation with Council.

Condition no.	Subject	RCC Response/Comments	Applicant Response
33	Drainage Plans and Construction Specification	The applicant objects to the timing for satisfying this condition. Providing the requirements of the condition are maintained an alternate timing could be considered. All documents would need to be prepared and approved prior to the commencement of any works on the new drainage system.	Noted / Agreed
36	External Drainage	Council will still need to give written approval to the design and construction of the proposed drainage works prior to the works commencing.	Noted / Agreed
37	Internal Drainage	Council cannot agree to deletion of Condition 37. Condition 37 sets the essential design parameters for the internal drainage system (including onsite detention). Condition 35 provides general information on catchments etc. to be considered in the drainage network design. Condition 37 is significantly different to Condition 35.	Noted / Agreed
REQUIREMENTS PRIOR TO THE COMMENCEMENT OF ANY WORKS			

43	Construction Traffic Management	Subsequent to the applicant preparing the comment agreement has been reached between Council and the applicant that a Works Zone will be installed in Botany Street. This agreement is likely to negate the need for any No Stopping signs.	Noted / Agreed
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Condition no.	Subject	RCC Response/Comments	Applicant Response
REQUIREMENTS PRIOR TO THE ISSUE OF A CROWN OCCUPATION CERTIFICATE			
57	Council's Infrastructure, Vehicular Crossings & Road Openings	Condition f. cannot be deleted at this stage. Firstly there are areas in Magill Street where concrete footpath do exist and secondly additional consultation is required between the applicant and Council as to the best location for any footpath.	Noted / Agreed
63	Nature strip upon Council's footway	The reference to Condition 9 is unclear however there are sufficient alternate safeguards in place to have civil and rectification works done to Council's satisfaction. No objection is raised to deletion of this condition.	Noted / Agreed
65	Stormwater engineer	Council cannot agree to delete this condition. All developments (including Crown Applications) that have onsite stormwater detention systems must create the legal mechanism/framework for ensuring the long term integrity and maintenance of the systems.	Noted / Agreed

