

29 July 2016

Macquarie Health Corporation
301 Catherine St
Leichhardt NSW 2040 Australia

Dear Mike,

**Re: Objection to SSD 167542
Development of a multi-storey staff car park at Royal Prince Alfred
Hospital, 106-112 Church Street, Camperdown ("the Application")**

Macquarie International Health Clinic Pty Ltd (Macquarie) have engaged Andrew Martin Planning Pty Ltd to review the submitted State Significant Development (SSD) Application and its accompanying Environmental Impact Statement (EIS) and consultant reports (together, "the Application") in relation to the multi-storey staff car park at Royal Prince Alfred Hospital ("the Proposed MSCP).

This submission is based on a review of the EIS, submitted as part of the SSD Application. This review deals predominantly with the town planning aspects of the proposal and includes comments regarding traffic and parking implications given that the proposal is justified on its ability to provide additional parking for hospital staff. Traffic comments have been prepared by Bitzios Consulting ("Bitzios") and ARUP consultants ("ARUP"), engaged by Macquarie to undertake a peer review of the submitted Traffic Impact Assessment (TIA), prepared by GTA Consultants on behalf of the applicant.

This submission should be read in conjunction with the Bitzios and ARUP peer reviews.

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Macquarie, jointly leases and operates the Existing Staff Carpark located on the corner of Grose St. and New Hospital Road (“the Existing Staff Carpark”). Macquarie objects to the SSD Application on the following grounds:

- The EIS does not fulfil SEARS baseline requirements;
- The Application encourages destination parking which is contrary to current urban design philosophy where car dependency is to be reduced not increased;
- The Application contains numerous unsubstantiated EIS statements;
- The Application proposes to use valuable street edge land holding in close proximity to hospital that would be better used/retained for uses other than parking;
- The Application is contrary to State Government Strategic Planning Directions;
- The Application is contrary to City of Sydney Strategic Planning Directions;
- The Application does not consider the potential Social Impacts resulting from loss of child care facility;
- No end of trip facilities or bicycle storage are provided for;
- The Application proposes a purpose built building for car parking that does not lend itself to adaptive reuse
- The Application is not in the Public Interest because the need for the facility has not been adequately justified and adverse impacts on traffic flows are likely.

These reasons for objection listed above are discussed below in more detail.

1.0 SUBJECT SITE

The subject site is known as part Lot 101 DP 1179349, 106-112 Church Street, Camperdown. The site is located on the south-eastern corner of the intersection of Lucas Street and Church Street in Camperdown. It is part of the grounds of the Royal Prince Alfred Hospital. The site is shown below.



2.0 STATE SIGNIFICANT DEVELOPMENT (SSD) APPLICATION

The proposal comprises the demolition of existing buildings onsite, clearing and site preparation works and construction of a 9-storey, single purpose, staff car park. The Proposed MSCP is to cater for 996 private hospital staff vehicles, 10 accessible spaces and 24 motorcycle spaces.

The proposal does not make provision for any bicycles or end of trip facilities for staff. There is no public car parking in the structure.

The EIS (section 1.1, page 4) describes the proposed development as:

“This project is being undertaken in response to the ongoing redevelopment of the Royal Prince Alfred Hospital (RPA Hospital) Precinct. It will provide for replacement of staff parking and aid in the support of recent and the ongoing growth of hospital facilities.”

3.0 SUBMISSION

Andrew Martin Planning Pty Ltd has undertaken a review of the Environmental Impact Statement (EIS) and the TIA as part of the SSD Application. A detailed review of other technical building, engineering and construction consultant reports does not form part of this review.

The findings of our review demonstrate that there are significant shortcomings in the baseline data that is relied upon which forms the basis for the Application. These

unresolved issues are of sufficient magnitude to call into question the ability of the consent authority to approve the Application.

1. Secretary's Environmental Assessment Requirements (SEARs)

The SEARS for this project was issued on 29 March 2016.

In part the *General Requirements* state:

"....Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include:

- ***adequate baseline data;***
- ***consideration of potential cumulative impacts due to other development in the vicinity; and***
- ***measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment."***

The TIA does not contain adequate baseline data that accurately details the amount of parking currently available in the study area; the amount of parking required to adequately cater for staff and other user groups of the hospital and surrounding area; the gap that supposedly exists and how the proposal addresses that gap. Baseline data is needed to reach an informed position in relation to the car park so that its size, scale, height, bulk, design and the like are justified in the circumstances of the case.

Clearly if the application was tested at a local level the application would fail. Council's local controls are centered on the provision of active and dynamic permeable street frontages with less reliance on vehicle travel. Car parking is one of the only '*development standards*' excluded from the Clause 4.6 provisions of SLEP 2012 demonstrating Council and State Governments support for the reduction of vehicle usage. On this basis it is paramount that greater justification be provided for the additional parking considering the existence of the Existing Staff Carpark (jointly owned by SLHD and Macquarie International Health Clinic) located on New Hospital Road and Grose St that provides 1,026 spaces at present (of which only 60% are utilised) with a consent to construct an additional 199 spaces in the future.

The EIS contains generalisations. For example:

"The proposed multi-storey staff car park will expand [of] sic the RPA Hospital Precinct car parking facilities to address the current shortfall of parking spaces and the projected increase in parking demand driven by population growth and service expansion (EIS, page 70)."

Macquarie engaged Bitzios and ARUP to undertake a peer review of the TIA prepared by GTA Traffic Consultants for the proponent. The TIA assumes a significant role in the justification of the proposal.

Both Bitzios and ARUP identify significant shortcomings in the analysis undertaken by GTA that strongly indicate that the Application under-represents the traffic impacts and congestion likely to occur as a result of the Proposed MSCP.

The baseline data used in the TIA is based on a sample of traffic counts that was measured on a single day in March 2016. The data has then been extrapolated for the whole operation of the precinct, based on AM and PM peaks and shift work, seven days per week. There is a built-in assumption that all staff work shifts. There has been no consideration of the error introduced by such extrapolation.

ARUP identifies a mismatch in the peak traffic volumes times utilised and the actual road network peak hours. These have significant flow-on effects to the assessment of the road network conditions during various time periods in a twenty-four hour period.

Bitzios identifies numerous shortcomings in the TIA and concludes the traffic impact of the development will be greater than stated in the assessment. Further analysis and assessment is required to better assess the impact of the proposed development on the road network.

Further, there is no consideration in the Application for the impact of approved but unbuilt capacity. These include the following:

- a. DA 097-00153: The stage two, 200 space enhancement of the MSCP located on New Hospital Road and Grose St ("the Existing Staff Carpark");
- b. DA 097-00154: The private hospital ("the Private Hospital") currently under construction located on the corner of New Hospital Road and Carillon Ave; and
- c. DA U99-00551: The 1,000 space car park to be located behind the King George V building.

The documentation speaks of 'ongoing redevelopment' and future development on the hospital site but makes no prediction as to what parking/traffic generation is likely/required or whether the expected expansions include additional parking facilities (expected expansions need to be qualified if the proposal is to be justified on expected demand). Other documents reviewed as part of this engagement (as discussed below) identify Camperdown as an area of ongoing growth and activity. Retail GFA increases along Missenden Road are identified as a desirable future uses.

The EIS contains no measures relating to traffic management, intersection modifications or any review of the on-street traffic and parking provisions. Recommendations contained within the TIA do not appear to be adopted into the EIS.

ARUP (section 4) concludes, in part:

“In light of the information presented in this report relating to an under-representation of traffic movements during the critical AM road network peak hour, consideration should be given to providing alternative access arrangements for vehicles entering the car park. The proposal is currently fully reliant upon the use of New Hospital Road which was not designed to cater for the volume of traffic resultant from the construction of a new 1,000 space car park.”

The proposal is contrary to the strategic vision for the immediate area. The traffic and parking justification provided would not, on initial review, provide justified demand for such a facility. The Existing Staff Carpark operates at 60%-70% of available capacity. Therefore, Macquarie questions the purpose of the proposed additional facility.

Based on the premise that baseline and cumulative data are not adequate, questions are raised as to the validity of the SIDRA results dealing with the future performance of intersections in the vicinity of the development. A number of the intersections are noted as C, D or E following completion of the MSCP. If the data is not accurate, then the modelling results may appear more favourable. As stated by ARUP (section 4) *“the traffic modelling under-represents the likely operation of key intersections in the vicinity of the site.”* If this is the case, those intersections, plus others are likely to fail. Further Macquarie advise that New Hospital Road has not been designed to cater for the amount of traffic likely to be generated by the Application.

In order to grant a lawful consent, a consent authority must be convinced that the facility has a specific planning purpose. In our opinion the Proposed MSCP is at odds with local controls designed to activate street edges and create safe permeable usable spaces. The outcome on offer with this application is a hard edged purpose built destination based parking facility. This type of parking facility is already provided at the Existing Staff Carpark.

2. Inadequate Justification

It is established above that the baseline and cumulative traffic data supplied as fundamental justification for the proposal is inadequate and cannot be relied upon for assessment of this Application. Further, it is contended that generalised statements do not provide a compelling case for the approval of the proposal.

The EIS states (page 6):

“The existing multi-storey car park located on the corner of Grose and Church Street previously contributed 1027 spaces with reduced rates for staff. However, a recent change under the terms of the lease to operate the car park has seen those spaces available to staff reduced to just 600 spaces with elevated parking fees. This has significantly restricted the availability of parking for staff within the RPA Campus, with the cumulative impacts of this having potentially negative consequences on the operation of the hospital.”

The previous statement is factually incorrect for several reasons. Firstly, there has been no change in the lease for the Existing Staff Carpark. On 2 November 2015, Macquarie was taken back possession of the carpark following a court order by the NSW Court of Appeal and commenced operating the carpark. At the time of Macquarie taking back possession of the Existing Staff Carpark, Macquarie observed that there were approximately 1,000 staff parking in the carpark per day and a total of approximately 2,000 regular users of this carpark. Since Macquarie resumed operating the carpark, Macquarie advises that the number of staff parking in the car park per day and the number of regular users of the carpark has not changed. Secondly, staff have full access to all 1,026 parking spaces contained in the Existing Staff Carpark. Thirdly, Macquarie advises that the Existing Staff Carpark is currently only being utilised to 60-70% of its current capacity, implying 300-400 available parking spaces.

Under Macquarie's operation of the Existing Staff Carpark, staff currently pay a discounted rate of \$9 per day. MHC advise that since November 2015 the whole of the car park remains available for use by staff, with a guarantee of 600 spaces for staff at a discounted cost of \$9 per day. The remaining spaces are available to staff and/or casual public parking. The cost of these spaces for staff is at a discount rate of \$12 per day. To date RPAH staff continue to comprise approximately 90% of all users of this car park and there has been no noticeable change in the number of staff parking at the car park. This may reflect the work shift start times – earlier than morning peak hour for the wider public.

3. NSW Government Strategic Directions

A Plan for Growing Sydney

In December 2014, the NSW Government published A Plan for Growing Sydney which is the new overarching strategic plan for the Sydney metropolitan area to 2031. The Plan sets out four goals:

- *A competitive economy with world-class services and transport;*

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- *A city of housing choice with homes that meet our needs and lifestyles;*
- *A great place to live with communities that are strong, healthy and well connected; and*
- *A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.*

The Plan is guided by three planning principles:

- *Principle 1: Increasing housing choice around all centres through urban renewal in established areas.*
- *Principle 2: Stronger economic development in strategic centres and transport gateways.*
- *Principle 3: Connecting centres with a networked transport system.*

To achieve these goals, the Plan includes 21 directions, supporting actions and priorities for each subregion. Whilst the Existing MSCP is designed to service staff, it is in effect dominating valuable land which is required for other future land uses supporting the hospital and the broader public. A consent authority should be mindful of the need to maintain suitable land holdings with dual street frontage where pedestrian connections are available for services and facilities and other required uses and not monolithic car parks. A car park is already provided in the immediate area that is available and used by hospital staff. The highest and best use of the land having regard to the NSW Governments' strategic vision for this sub region is not for parking. Parking is already provided in this precinct for staff and if additional parking was required (MHC has 199 additional spaces yet to construct) then it should be located elsewhere and not on this particular site. The site is too valuable in an area where such redevelopment opportunities are rare.

Child care is an ongoing National and State issue. The loss of child care services is not in the public interest. The subject site contains an existing 70 place child care centre – an essential service for onsite workers of the hospital. No Social Impact Assessment (SIA) has been undertaken to account for the loss of this facility

4. City of Sydney Council Strategic Directions

Sustainable Sydney 2030 Community Strategic Plan (2014)

The Sustainable Sydney 2030 plan is for a Green, Global and Connected city. Connected includes physically by walking, cycling and high quality public transport and connected communities through social well-being and quality. There is a strong emphasis on increasing opportunities for use of public transport, walking and cycling throughout the city area and its neighbouring districts.

The RPA Hospital precinct and Camperdown are located in the focus area. The Council is seeking to fulfil its responsibilities for the goals and directions contained in the Community Plan 2030 through a number of actions, including putting in place changes to its planning policies and guidelines that discourage the provision of parking for vehicles over and above maximum parking rates. They are also actively increasing the attractiveness of cycling and walking with better pathways and routes throughout the LGA together with end of trip facilities and even floor space bonuses in the City to encourage these alternative mode of transports.

The ten specific target areas to make the city more sustainable are:

<p>Target 1: The city will reduce greenhouse gas emissions by 70 per cent compared to 2006 levels.</p>	<p>Target 6: Trips to work using public transport will increase to 80 per cent, for both residents of the city and those travelling to the city from elsewhere.</p>
<p>Target 2: The city will have the capacity to meet 100 per cent of electricity demand by local electricity generation, 30 per cent of water supply by local water capture and increased canopy cover of 50 per cent by 2030.</p>	<p>Target 7: At least 10 per cent of city trips will be made by bicycle and 50 per cent by pedestrian movement.</p>
<p>Target 3: There will be at least 138,000 dwellings in the city (including 48,000 additional dwellings compared to the 2006 baseline) for increased diversity of household types, including greater share of families.</p>	<p>Target 8: Every resident will be within reasonable walking distance to most local services, including fresh food, childcare, health services and leisure, social, learning and cultural infrastructure.</p>
<p>Target 4: 7.5 per cent of all city housing will be social housing, and 7.5 per cent will be affordable housing, delivered by not-for-profit or other providers.</p>	<p>Target 9: Every resident will be within a 3 minute walk (250 m) of continuous green links that connect to the Harbour Foreshore, Harbour Parklands, Moore or Centennial or Sydney Parks.</p>
<p>Target 5: The city will contain at least 465,000 jobs (including 97,000 additional jobs) compared to the 2006 baseline) with an increased share in finance, advanced business services, education, creative industries and tourism sectors.</p>	<p>Target 10: The level of community cohesion and social interaction will have increased based on at least 65 per cent of people believing most people can be trusted.</p>

The 10 targets are supported by a number of strategic directions and objectives. **Strategic Direction 03: Integrated transport for a Connected City** includes the following that directly relates to the proposal:

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Objective 3.2

Transport infrastructure is aligned with city growth.

City Now: More sophisticated policy responses are required so that city residents travelling within Inner Sydney can rely on a range of transport modes.

City in 2030: Enhanced opportunities for inner Sydney residents to walk, cycle and take public transport to the city centre.

Objective 3.3

Negative impacts from transport on public space in the city centre and villages are well managed.

City Now: Public transport operation is constrained.

City in 2030: Active management of travel demand.

An integrated approach to traffic management, public transport, walking and cycling and public domain design.

The provision of a the Proposed MSCP specifically aimed at providing staff with access to parking of private vehicles is not justified or reasonable in this case given that facilities currently exist in the immediate locality. The proposal does not accord with State and Local government vision, initiatives, policies and actions to reduce the number of vehicles on our roads. Further the premise that alternative parking is not available for staff is not accurate based on the advice of Macquarie who operate The existing Staff Carpark.

The Proposed MSCP provides for 996 private vehicles, including 10 accessible spaces and 24 motorcycle spaces. It is specifically intended to be used by RPAH staff driving to and from work due to shift work hours. There are figures provided to substantiate the need for an additional 1000 spaces in the area, specifically for staff only. Accessible spaces account for 1% of total spaces and 2.4% of spaces onsite being available for modes of transport other than private vehicles. There is no provision for bicycles onsite, no racks or lockers and no end of trip facilities for staff. The proposal is developed solely for the convenience of private vehicle commuters, who are staff of the hospital. Any future facility must provide for alternate travel modes. Without adequate baseline data to substantiate the size and composition of the car park the proposal cannot be supported.

On this basis it is clear that the proposal does not reflect the State Government's strategic direction to increase alternative forms of transport; increase the utilisation of public transport; and decrease reliance on vehicles for work purposes. The proposal includes no genuine attempt to increase the use of alternative modes of transport.

City of Sydney LEP 2012

The assessment of the development is required to consider the provisions of the City of Sydney LEP 2012. There are a number of relevant aims and objectives, as follows:

1.2 Aims of Plan

(1) This Plan aims to make local environmental planning provisions for land in the City of Sydney in accordance with the relevant standard environmental planning instrument under section 33A of the Act.

(2) The particular aims of this Plan are as follows:

(a) – (b)

(c) to promote ecologically sustainable development,

(d), (e) ...

(f) to enable a range of services and infrastructure that meets the needs of residents, workers and visitors,

(g) to ensure that the pattern of land use and density in the City of Sydney reflects the existing and future capacity of the transport network and facilitates walking, cycling and the use of public transport,

(h), (i) ...

(j) to achieve a high quality urban form by ensuring that new development exhibits design excellence and reflects the existing or desired future character of particular localities,

(k), (l)

The provision of adequate support services for staff of the hospital, including an appropriate level of parking, is not disputed. Further the contribution of the staff to the health and well-being of the wider community is also supported. However, any development proposal must be based on well-founded and complete baseline data otherwise it has no purpose and can not be justified. The proposal fails to satisfy the high quality urban form criteria. An additional and quite substantial parking facility is not achieving the desired future use of the land given the existence of an approved car park with 1026 spaces (199 yet to be constructed). The land around the hospital is valuable in a strategic sense and its use must be for a justified and defined purpose.

City of Sydney DCP 2012

By virtue of Clause 11 of SEPP State and Regional Development, the provisions of a DCP are not applicable to the assessment of a SSD Application. Notwithstanding the objectives and character statements contained in the DCP are considered relevant as a guideline for determining whether a development is consistent with it's surrounding and the planning intent for the locality.

Section 3 General Provisions: 3.11 Transport and Parking

Objectives

- (a) Ensure that the demand for transport generated by development is managed in a sustainable manner.
- (b) Ensure that bike parking is considered in all development and provided in appropriately scaled developments with facilities such as change rooms, showers and secure areas for bike parking.
- (c) Establish requirements for car share schemes for the benefit of people living and or working within a development.
- (d) Design vehicle access and basement layouts and levels to maximize pedestrian safety and create high quality ground level relationships between the building and the public domain.
- (e) Provide accessible car parking.

The Proposed MSCP will function as a destination car park, in a similar manner to any large shopping centre, bulky goods outlet or residential complex. It is proposed for staff of the hospital only and is a commuter car park for one sole purpose. Further, the provision of a monolithic, 9-storey carpark is not anticipated by the character statement for Camperdown. This single purpose, hard edged structure does not provide for a vibrant permeable pedestrian interface within a future high density mixed use neighbourhood.

DCP 2012 contains the following character statement for the Camperdown area in the vicinity of the subject site.

*“Camperdown is to continue its transformation from industrial uses to a **vibrant high density mixed-use neighbourhood**. Missenden Road is encouraged to support the centre emerging near Parramatta Road and **further retail activity along Missenden Road**. East-west links are encouraged through the hospital site and University to create a route between Camperdown Park and Victoria Park.”*

5. Potential Social Impacts

The State Governments strategic direction seeks to increase the number of dwellings and population in the inner Sydney region. Directly associated with this is the provision of community and family services. For families, especially young families with both parents working, this means a high reliance on the provision of child care services in an easily accessible location. The loss of 70 child care places within this precinct is not addressed in the EIS.

The EIS states (page 63):

.... child care services are currently being provided on the RPA campus, with around 70 places provided within a Sydney Local Health District staffed facility on the site. This number of child care spaces provided is a small proportion of demand generated by existing staff on the RPA campus, but nonetheless contributes to staff welfare. As a result, 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. As such there will be no nett social impact as a result of the proposed development."

A SIA has not been submitted with the SSD application. Any new centre or an expansion of a child care centre within the City of Sydney LGA requires a development application to Council and preparation of a SIA to address the increase. Approval of additional spaces in existing facilities is not complying development and is subject to DA assessment and Council approval. No details of the capacity or otherwise is provided thus the generalised statements in the EIS are not substantiated.

The loss of 70 child care places, without any supporting evidence of where and if these places can be replaced and/or relocated is unacceptable. Seventy (70) child care places can equate up to 70 staff of the hospital that may not be able to access child care. This would have significant social impacts on those families and could impact on their ability to undertake or maintain current employment.

The EIS states that 70 places are a small proportion of demand generated by existing staff. This may cause higher demands on existing centres resulting in more competition for places and increased costs.

The closing of the centre also results in a loss of employment for those currently working onsite. These numbers may be small, but have not been acknowledged or addressed as part of the likely economic and social impacts of the redevelopment of the site.

Further, the EIS did not canvass any option to retain the child care centre on the site, as part of the redevelopment. Part of the charter of an EIS is to acknowledge and assess (to the extent necessary) all options (even the option of not undertaking the project).

Other Social Impacts

The EIS does not address the increased traffic generated by the proposal to the extent necessary in terms of ambulance response times and potential impacts on access to the Emergency Department off Missenden Road. With longer queuing and waiting times on local streets there is an obvious impact on ambulance services approaching RPA Hospital where critical delays can be expected as a direct result of additional traffic.

Further pedestrian access and safety is paramount around the streets and grounds of the hospital. There is a pedestrian crossing in front of the existing car park. This crossing is already an extremely busy crossing. This adds to the traffic queuing and wait times on New Hospital Road. Wait times will be increased with the introduction of up to 1000 additional car spaces. Currently this crossing sits beyond the vehicular entry to the existing car park and has limited impact on in bound traffic. However the proposed entry to the new car park is beyond this crossing. With added conflict points at one place, there is an added risk to pedestrians. ARUP also raise this point.

6. The Public Interest

The EIS states that:

- *“The site is presently underutilised, being occupied by vacant structures that do not efficiently or economically make best use of the land. A portion of these vacant structures have been fenced off and left to dilapidate, creating an unattractive streetscape and potential future safety concerns.*
- *The proposed use is ancillary to the operation of the RPA Hospital and as such must be appropriately located within the Campus to support this critical piece of social infrastructure. The subject site was identified for being an underutilised allotment ideally located to service the North Western Precinct of the RPAH Campus, regular in shape, and with two available street frontages to facilitate appropriate access and egress arrangements, as well as a frontage to the internal road network to take advantage of the relative permeability of the Campus.*
- *The size and dimensions of the land are appropriate for accommodating the proposed building envelope, and as such the proposal does not have any planning or environmental constraints which would preclude the proposed development on site.*

Accordingly, in regards to the characteristics of the site and its surrounding context, the proposed development is considered to be suitable and to be within the public interest.”

This statement relates to the size, shape and location of the site and its current use. It does not take into account whether the loss of the child care centre is in the public interest or whether the resultant increase in traffic generated and congestion will result in issues with emergency vehicles or safe access to the campus. These are broader issues related to the general public that are not reasonably addressed in the EIS.

The provision of support facilities for staff who work in the medical and health system is essential. There is insufficient justification to confirm that a key site should be used for an additional parking facility. Parking is already provided in close proximity to the hospital for the staff at a discounted rate. Strategically the site would be sterilised by parking use as a parking structure is a purpose built non-adaptive structure. A more appropriate building is one which has the capacity to be adaptively reused to account for future demands of the hospital precinct.

As noted previously, the loss of 70 child care places has not been justified in the EIS and is of serious concern given the lack of clarity as to the replacement positions and the need to obtain development consents for increased demand. There has been no SIA for the loss of the spaces.

The following is a single media release that demonstrates RPAH's ongoing support for alternative modes of transport for workers and their families. The proposed infrastructure does not include any facilities to encourage cycling and less than 5% of spaces for motorcycles and only 1% accessible parking spaces. There appears to be disconnect between corporate policies and the current application.

BIKE CHALLENGE IS BIG BUSINESS FOR SYDNEY COMPANIES



CEOs, executives and industry heavyweights from hundreds of businesses are gearing up to join next month's [Sydney Rides Business Challenge](#) – the biggest event of its kind in Australia.

The four-week challenge from 22 February to 20 March, aims to get more people riding and boost productivity for Sydney businesses.

Companies already on board include Qantas, Westpac, LinkedIn, eBay, Hilton Sydney, Lend Lease, NRMA, **RPA Hospital** and Sydney University.

Lord Mayor Clover Moore said the Sydney Rides Business Challenge highlights the benefits of riding not just for health but also for businesses big and small.

"The bottom line is, bikes are good for business," the Lord Mayor said.

"More people riding or walking to work generates more productivity for businesses – and it helps ease the chronic traffic congestion, which costs Sydney businesses and residents \$2.5 billion every year.

"Bike riders shop locally, and more often.

"More than 7,000 people ride to work in the city centre each day – that's the equivalent of 116 full buses or seven packed Sydney trains. The Sydney Rides Business Challenge is about supporting active, healthy and happy employees already riding to work and encouraging their workmates to give it a go."

Committee for Sydney CEO, Dr Tim Williams said the free competition was a great opportunity for businesses to benefit from being a bike friendly workplace.

"Not only is cycling an increasingly popular way to commute, it's also at the heart of the economic success of global cities," said Dr Williams.

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"There's good reason that businesses in London, Paris and New York have embraced cycling, and it's great Sydney businesses are starting to do the same."

"Cycling isn't some eccentric hobby. Modern global business knows that the cities that provide world class cycling infrastructure and encourage active transport are the ones that attract talent."

"Global talent, the highly sought after professionals that all global cities are competing to attract, see the immediate benefits of a city that makes it possible to cycle to work. Great bike networks in turn encourage employers to maintain end-of-trip facilities, which supports increased physical activity and better employee engagement."

The Sydney Rides Business Challenge runs from 22 February to 20 March, with a range of prizes for businesses and individual riders across a number of categories.

(Source: <http://www.sydneycycleways.net/bike-challenge-is-big-business-for-sydney-companies/>)

4.0 CONCLUSION

The submitted application does not adequately address the SEARs requirements issued by the Department in March 2016. Without adequate baseline data any conclusion that supports the application is misguided.

The EIS contains statements that are not substantiated and serve to promote the proposal without certainty of facts and accuracy. We do not agree that a compelling case has been presented for what is an imposing hard edged structure in an area which is already well serviced by a staff accessible car park offering subsidised rates for staff.

The provision of support services for staff of RPAH, including appropriate parking and family services is not disputed. However, any application should contain conclusive baseline data supporting that position.

The EIS does not address the potential social impacts of the development. The EIS states that the loss of 70 child care places is to be absorbed by surrounding centres. There is no evidence provided that this can or will occur once this existing centre is closed. Child care is an essential family service for staff and needs to be considered. No assessment of increased traffic generation is made in relation to emergency access for ambulances or for visitors and patients requiring ease of access to hospital services or the costs incurred by them for parking for ongoing or recurring treatments.

In our opinion the dedication of a large dual fronted land holding requires greater investigation and more compelling evidence in support of the proposal. The advice from Macquarie states that the Existing Staff Carpark continues to serve an equivalent

number of staff as was observed at the time that Macquarie commenced operating the Existing Staff Carpark in November 2015. Approximately 300-400 spaces of the Existing Staff Carpark are not utilised and the additional 199 spaces yet to be constructed will cater for current and future additional demands. On this basis the use of the Application as a destination car park is not justified from a strategic planning perspective. The car park will not be an adaptive building and is specific to its use which is not entirely desirable in this particular location.

On the basis of the reasons set out above, it is our opinion that the SSD Application is not worthy of support in its current form and should be refused.

Regards,

A handwritten signature in black ink, appearing to read 'A Martin'.

Andrew Martin *MPIA*
Principal