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David Gibson, Team Leader, Social Infrastructure Assessments
NSW Department of Planning and Environment
Sydney NSW 2000

Attention: Lee McCourt
Email: lee.mccourt@planning.nsw.gov.au

Dear Lee

State Significant Development 7542 – RPA Hospital Multi-storey Staff Car Park

I refer to your correspondence dated 14 June 2016 inviting Council to make a submission regarding the State Significant Development Application SSD 7542 for a multi-storey staff car park at Royal Prince Alfred Hospital at 67-81 Missenden Road, Camperdown (otherwise known as 106-112 Church Street).

The State Significant Development (SSD) application is for the development of a nine storey car park comprising 996 car parking spaces, operating 24 hours per day 7 days per week. The proposal also involves the construction of the new Brodie Street; car park signage; and associated landscape works.

The City has reviewed the information provided as part of the public exhibition. While the City acknowledges the need to provide sufficient parking for essential hospital workers, there are a number of significant issues that should be addressed prior to determination, which are outlined below for your consideration.

Loss of Child Care

City staff wrote to the Department of Planning and Environment in March 2016 advising of the City's desires in relation to the SSD application. Amongst other things, the City raised concern regarding the relocation of the existing staff child care centre on the car park site and recommended that the applicant give consideration to providing a new child care centre on the top level of the new car park.

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.

Parking

Car parks in the SP2 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.

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.

Maximum car parking spaces permissible

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.

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.

Accessible parking

The City's Transport and Access Unit recommends that a minimum of 10 accessible car parking spaces be provided in this development, as is currently proposed.

Accessible parking spaces must be designed in accordance with Australian Standards including having the shared area located adjacent to the space (refer to Figure 1 below). It is noted that the plan illustrated in the submitted Traffic Impact Assessment does not comply with this requirement.

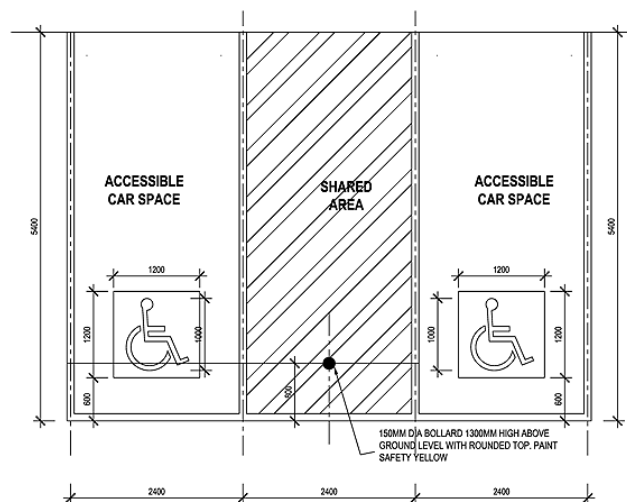


Figure 1: Shared area located adjacent to accessible car parking spaces

Traffic impact on the adjacent road network

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 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.

Pedestrian safety and amenity

Pedestrian safety and amenity, including at crossing points and the Brodie Street shared zone should be strengthened and included as part of design development.

Cycle facilities

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.

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.

Sustainable Transport

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. 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.

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.

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.

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.

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.

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.

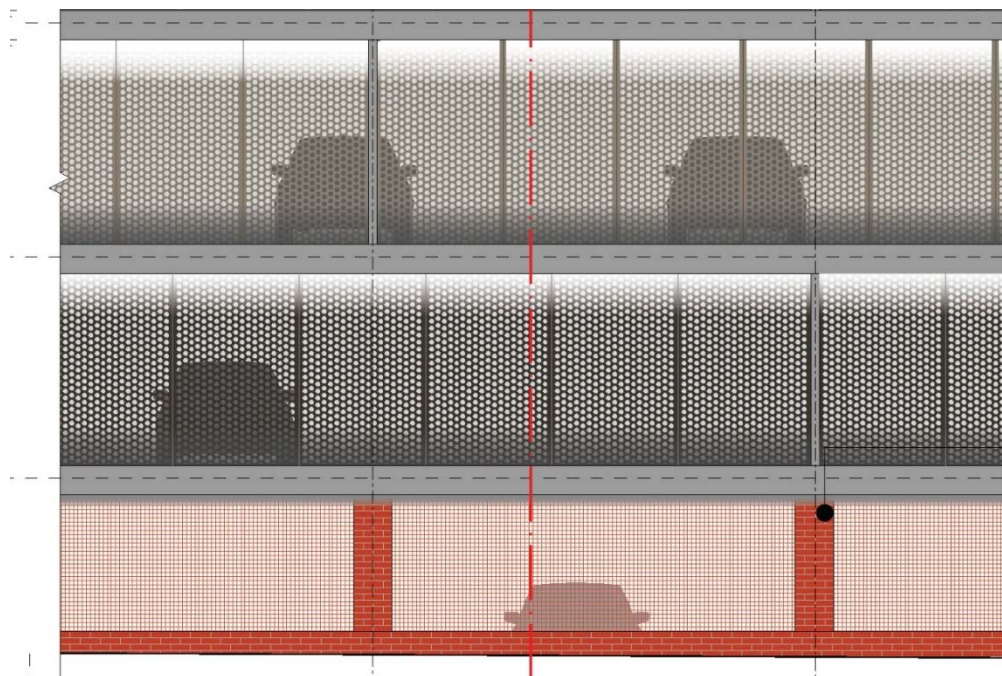


Figure 2: Detailed facade elevation showing the size of the perforations.

Currently proposed mitigation measures are limited to the top and bottom of the car park ramps on typical floors. This does not mitigate impacts to the remainder of the facades.

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).

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.

Accessibility

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.

Crime Prevention through Environmental Design

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 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.

Heritage

Demolition of the existing School of Nursing Building

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.

Archaeological potential

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.

Impact to the Queen Mary Building

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 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 not only lessen its impact on the QMB but also on the immediate surroundings of the site.

Landscaping and Public Domain

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.

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.

Urban heat island effect and canopy cover

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.

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 recommend 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.

Conclusion

While the City acknowledges the need to provide sufficient parking for essential hospital workers on the RPA site, there are a number of significant issues that have not been adequately addressed in the application and the supporting documentation. We are also of the view that certain aspects of the design will result in poor outcomes, particularly in terms of urban design and heritage. Accordingly, the City does not support the proposal in its current format and is unable to provide recommended conditions of consent.

The City recommends that the application be amended to address the above concerns, and we look forward to providing comments on the amended proposal.

Should you wish to speak with a Council officer about the above, please contact Christopher Ashworth, Senior Planner, on 9246 7757 or at cashworth@cityofsydney.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

Graham Jahn AM
Director
City Planning | Development | Transport