

15 November 2016

File Number: 2016/596207
Our Ref: R/2016/9/B

Brent Devine, Senior Planner, Planning Services
NSW Department of Planning and Environment
Sydney NSW 2000

Email: Brent.Devine@planning.nsw.gov.au

Dear Brent,

**RE: Response to Submissions – State Significant Development (16_7542)
RPA Hospital Multi-storey Staff Car Park**

I refer to your correspondence received on 18 October 2016 informing Council that the applicant has prepared a response to submissions regarding the proposed State Significant Development (16_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).

We have reviewed the Response to Submissions Report and the supplementary documentation. While the City is supportive of RPAs efforts to resolve existing parking issues on the site; the City is unable to provide support for the application in its current format. The City strongly objects to the proposal on the grounds of insufficient information and uncertainty regarding the permissibility of the proposed quantum of car parking spaces. We also note that our concerns regarding the design of the building, and the amenity impacts arising from the design, have not been addressed.

Attachment A is a table summarising the City's review of the Response to Submissions. The table nominates the issues raised within the City's original submission, discusses the applicant's response to the issues raised, and outlines the City's sustained objections in relation to the project where applicable.

Due to ongoing uncertainty regarding permissibility, the City is unable to provide recommended conditions of consent at this time.

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 'C. Corradi', with a stylized flourish at the end.

CHRISTOPHER CORRADI
Area Planning Manager

ATTACHMENT A

REVIEW OF RESPONSE TO SUBMISSIONS

Issue	Applicant's Response	Issue Addressed?	City's Contention
LOSS OF CHILD CARE			
<p>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.</p> <p>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.</p>	<p>The SLHD has negotiated an agreement with Guardian Early Learning Group (GELG). GELG undertook expansion of their services in order to accommodate the families from LSCCC and as such there has been no net loss in child care spaces. The majority of families transitioned to the GELG centre at Camperdown, just 600 metres from RPAH. A small number have moved to other centres operated by Guardian. A further small group have moved to other arrangements that better suit their needs. The fees at GELG are comparable to those charged at the LSCCC. Two of the staff transferred to the Concord Hospital Child Care Centre whilst the all of the remaining staff have been offered employment by GELG. Staff have been given offers no less favourable than their current employment. It is emphasised a child care centre located on the roof was</p>	No	<p>The City's concerns have not been satisfactorily addressed.</p> <p>It is unclear from the response if additional childcare places have been created elsewhere, or if the children from the closed childcare facility were moved into existing places at other centres.</p> <p>The applicant could alleviate these concerns by providing a tally of the number of places available at the relevant childcare centres prior to the closure of the existing facility, compared with the number of spaces available at the present time.</p> <p>The City does not support the loss of any childcare places due to the significant shortage in the locality and the wider LGA.</p>

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	found to not be feasible or appropriate during the design development stage of the proposal.		
TRAFFIC AND PARKING			
Car parks in the SP2 zone			
<p>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.</p> <p>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 only. This will prevent the use of the car park by third parties as a private car park, which is prohibited in the zone.</p> <p>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 <i>'This Division applies to development for</i></p>	<p>As detailed within the Environmental Impact Statement (EIS), the MSCP is identified as ancillary to the existing operations of the RPAH and is permissible with consent within the SP2 Infrastructure (Health Services Facility) Zone. As outlined within the EIS, the proposed car park will be restricted to staff only.</p> <p>As identified by the City of Sydney, given the MSCP is ancillary to the existing RPA Hospital operations, the provisions of Part 7 Division 1 'Car parking ancillary to other development' of the Sydney LEP 2012 would apply.</p> <p>Division 1 of the Sydney LEP 2012 seeks to identify the number of car parking spaces that may be provided to service particular uses of land and minimise the amount of vehicular traffic</p>	Yes	<p>The applicant has clarified that the proposed multi storey car park is ancillary to the hospital use.</p> <p>Conditions of consent will be required to restrict the use of the car park to hospital staff only.</p>

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<p><i>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'.</i></p> <p>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.</p>	<p>generated because of proposed development.</p> <p>The development of a multi-storey staff car park on the site has been proposed with the expressed intention of providing hospital staff with sufficient parking to accommodate their journey to work.</p> <p>Part 7, Division 1 does not expressly identify a Hospital Land Use, nor is it identified under Other Land Uses. While the Proponent recognises the need to limit oversupply of car parking spaces within the City of Sydney to reduce the potential for traffic generation, the associated staff parking demands for a hospital have been reviewed in detail (and are outlined within the updated TIA at Attachment B) and there is a recognised existing under supply to meet the needs of staff following recent expansion works within the RPAH Precinct.</p> <p>The proposed MSCP is considered to be essential ancillary infrastructure at RPA that is critical to operations and</p>		

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	essential to attracting the best talent and staff retention and it should be assessed accordingly against Part 7, Division 1 of the Sydney LEP 2012.		
Maximum car parking spaces permissible			
<p>996 spaces are proposed; however the application does not provide any justification for this quantum of car parking.</p> <p>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.</p> <p>The RPA campus provides a mix of land uses, some of which have maximum car parking rates prescribed in the LEP, including:</p> <ul style="list-style-type: none"> • 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)). 	<p>The updated TIA at Attachment B concludes the following in relation to the requirement for car parking on site:</p> <p><i>Several car parking areas are available within the RPAH precinct providing staff parking supply of 300 spaces, plus 77 visitor spaces and 70 spaces dedicated for use by fleet vehicles. 600 spaces are currently allocated to staff in the main existing multi storey car park south of the site with access via Grose Street (though noting that the rates charged by the private operator significantly exceed the Ministry fees policy and as a result, these spaces are poorly patronised by staff). In the short term, a further 427 spaces are currently available to staff and visitors in the existing multi storey car park, but are subject to public parking fee rates, meaning there will be minimal staff use. These 427 spaces would not</i></p>	No	<p>In our original submission, the City clearly outlined the assessment process to establish the maximum car parking provisions applicable to the site.</p> <p>In our view, the amended Traffic Impact Assessment (TIA) has not:</p> <ul style="list-style-type: none"> • provided a verifiable audit of the number of car parking spaces existing on the site; • established the maximum permissible car parking spaces for the land uses identified in Part 7 Division 1 'Car parking ancillary to other development' of the Sydney LEP 2012, including: <ul style="list-style-type: none"> ○ Office premises (Clause 7.6);

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<p>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.</p> <p>In summary, it is recommended that the application be amended to:</p> <ul style="list-style-type: none"> • 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. 	<p><i>however be available for future use given their allocation to the private hospital.</i></p> <p><i>On the above basis, while there are approximately 900 off-street spaces available to RPAH staff, patronage levels would be a fraction of this amount.</i></p> <p><i>Furthermore, the Proponent assessed the need for provision of a staff only multi storey car park within the RPAH campus. The assessment identified an existing staff parking demand associated with the morning shift of approximately 1,700-1,800 vehicles based on a detailed assessment with consideration of the following:</i></p> <ul style="list-style-type: none"> • <i>existing staff FTE including typical Visiting Medical Officers (VMO)</i> • <i>breakdown across shifts</i> • <i>proportion of staff who currently drive to work</i> • <i>average vehicle occupancy.</i> <p><i>Given that there are approximately 900 off-street spaces available for use by staff, this equates to a shortfall of 800-</i></p>		<ul style="list-style-type: none"> ○ Retail premises (Clause 7.7); ○ Child care centres (Clause 7.9 (2)); and ○ Health consulting rooms and medical centres (Clause 7.9 (4)); or <ul style="list-style-type: none"> • appropriately justified the proposed quantum of car parking for uses not identified in the Sydney LEP 2012. <p>In particular:</p> <ul style="list-style-type: none"> • The TIA states that 900 existing off street spaces are available for use by staff, but does not provide substantive evidence to support this statement. The applicant is requested to provide a table identifying all car parking areas on the RPAH campus that were taken into account, and the number of spaces provided in each of those parking areas. A map should also

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<p>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.</p> <p>Additional car parking above the permitted maximum rates is prohibited, and must not be approved.</p>	<p><i>900 spaces. On this basis, the proposed car parking supply of 996 spaces is suitable to accommodate this shortfall, as well as allowing for demand associated with the peak staff changeover and some of the anticipated future growth.</i></p> <p>Accordingly, while the Proponent recognises the need to limit oversupply of car parking spaces within the City of Sydney to reduce the potential for traffic generation, the associated staff parking demands for a hospital have been reviewed in detail and there is a recognised existing under supply to meet the needs of staff following recent expansion works within the RPAH Precinct.</p>		<p>be provided clearly identifying the location of the parking areas identified in the table.</p> <ul style="list-style-type: none"> • The revised TIA does not include a floor space area schedule for the existing land uses on the RPAH site that are identified in Part 7, Division 1 of the Sydney LEP 2012. It is impossible to ascertain the maximum permissible quantum of car parking for those land uses without this. This is a critical issue, as the Consent Authority is unable to consider or approve any additional spaces for use by staff associated with those land uses if the maximum has already been reached. • The proponent's justification for the proposed number of spaces is unsatisfactory, in that: <ul style="list-style-type: none"> ○ The TIA finds that there is a shortfall of 800-900 spaces, a figure that is far too

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			<p>imprecise to assist the Consent Authority in undertaking its assessment;</p> <ul style="list-style-type: none"> ○ It is not clear if staff working on the RPAH campus in office, retail, childcare, or health care and medical consulting rooms have been excluded from the study of parking demand generated by RPAH staff. These workers are associated with land uses that are subject to parking maximums, and must be excluded from the study to prevent 'double dipping'. ○ Notwithstanding the City's concerns regarding the veracity of the claimed requirement

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			<p>for 800-900 spaces, the proposal is for 996 spaces, and therefore 96 spaces are clearly surplus to requirements and cannot be approved.</p> <p>Further to the above, the City is concerned that the existing 600 spaces allocated to staff at the Grose Street multi-storey car park may not have been taken into consideration due to the ongoing price dispute with the operator. We note that the pricing issues are a civil matter rather than a planning matter, and do not warrant those car parking spaces being excluded from the assessment.</p> <p>In conclusion, the TIA is unsuitable in its current format. It cannot be relied upon to undertake an assessment against the maximum parking provisions of the LEP, and it does not provide adequate justification for the proposed quantum of car parking for land uses not identified in the LEP.</p>

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			We reiterate that car parking spaces in excess of the permitted maximum are prohibited, and under the provisions of Clause 4.6 (8), development standards contained within Division 1 of Part 7 of the LEP are development standards that cannot be varied.
Accessible parking			
Accessible parking spaces must be designed in accordance with Australian Standards including having the shared area located adjacent to the space. It is noted that the plan illustrated in the submitted Traffic Impact Assessment does not comply with this requirement.	GTA have confirmed that all accessible parking spaces have been designed in accordance with section 2.2.2 of AS2890.6:2009.	Partially	The Consent Authority must be satisfied that all accessible car parking spaces are in accordance with Australian Standards.
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	The proposal includes vehicle entry along Grose Street (Hospital Road) via the signalised intersection at Carillon Avenue. Vehicles would exit the site via Lucas Street and Church Street, thereby dispersing site generated traffic across	No	The City's concerns remain unaddressed.

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<p>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).</p> <p>As a result of the proposal, the Parramatta Road-Mallett 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.</p> <p>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.</p>	<p>several surrounding intersections to mitigate any such traffic related impacts. The spread of traffic during the afternoon departure is greater than during the morning arrival, hence further limiting the extent of impacts on surrounding intersections.</p> <p>The Proponent is committed to working with RMS, City of Sydney and other stakeholders to determine the need for any such intersection improvements at surrounding intersections, including Parramatta Road/ Mallett Street. The revised Transport Impact Assessment also addresses the following:</p> <p><i>The intersection of Parramatta Road/ Mallett Street does experience some additional queuing for the Mallett Street approaches, noting that the overall intersection operation (and Parramatta Road function) remains fairly consistent with existing conditions.</i></p> <p><i>The specific need or otherwise for any such intersection modifications would need to be investigated further, with</i></p>		

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	<p><i>any such implementation to be determined in consultation with RMS.</i></p> <p><i>As discussed throughout, the signalised intersection of Carillon Avenue/ Grose Street will need to accommodate a significant proportion of the proposed MSCP traffic. Naturally, there would be impacts to the function and operation of this intersection as a result of the proposal, especially when considering the cumulative impacts of this proposal and the private hospital. That said, the private hospital would also see the majority of the AM peak arrivals after 8:00am and certainly on the edge of peak generation associated with the proposed MSCP. The impacts on the intersection are likely to be limited to linemarking, turn bay extensions and removal of kerbside parking in order to maintain an acceptable intersection level of service. These potential modifications are illustrated in Figure 6.3 (existing) and Figure 6.4 (potential future).</i></p>		

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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.	Not addressed.	No	The City's original comments remain unchanged.
Cycle facilities			
<p>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.</p> <p>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.</p> <p>Notwithstanding the above, it is recommended that at least 100 bicycle parking spaces be</p>	<p>The Royal Prince Alfred Hospital Transport Access Guide at Attachment C, identifies various locations across the hospital campus where existing bicycle parking is available. End-of-trip facilities are also provided for staff, including bathrooms and shower facilities in each building. On-site observations and feedback from SLHD indicate that there is spare capacity across these bicycle parking facilities. The site is not the most desirable location for bicycle parking and given the observed capacity, would be unlikely to be used. Accordingly, no additional bicycle parking facilities will be provided within the proposed car park.</p> <p>It is further emphasised that DCPs are not a relevant matter for consideration</p>	No	The City's original comments remain unchanged.

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<p>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.</p> <p>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.</p> <p>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.</p>	<p>in the assessment of a SSD Application.</p>		
Sustainable Transport			
<p>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</p>	<p>RPAH has an existing policy that is used to allocate staff permits, which generally comprises of a wait list of the interested personnel who are assigned</p>	<p>No</p>	<p>RPAH's review of its parking allocation methodology is noted.</p>

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<p>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.</p>	<p>permits as they become available. RPAH is presently undertaking a review through consultative committee as to how parking will be allocated upon completion of the proposed MSCP.</p>		<p>As previously noted, the City is concerned that staff working on the RPAH campus in office, retail, childcare, or health consulting rooms and medical centres may have been included in the study that established parking demand, resulting in double dipping.</p> <p>Related to this issue, a parking allocation strategy must form part of this application to ensure that parking allocations to staff associated with the abovementioned land uses do not exceed the maximum number of spaces permitted by the LEP.</p>
<p>To achieve sustainable goals the following should also be considered:</p> <p><i>Car Share</i> 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</p>	<p>SLHD is continually investigating campus wide transport initiatives including a car pooling strategy. RPAH recently initiated a shuttle bus service between RPAH and Redfern Railway Station which runs at peak periods during the day and into the evening. The service has been well patronised and will be monitored and services expanded should its use continue to grow.</p>	<p>No</p>	<p>No commitment has been made to provide car share spaces or to investigate car-pooling.</p> <p>The City reiterates that the Secretary's Environmental Assessment Requirements (SEARs) require a pricing policy for the use of the car park to align public transport and active transport targets with private</p>

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<p>that at least 4 car share parking spaces are provided.</p> <p><i>Car Pooling</i> 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.</p> <p><i>Green Travel Plan (GTP) and Transport Access Guide (TAG)</i> The development should implement a Green Travel Plan (GTP) and Transport Access Guide (TAG).</p> <p>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.</p>	<p>SLHD has been in negotiation with Sydney Buses to increase the frequency of bus services to RPAH. To date, there has been no increase in service to the campus.</p> <p>Notwithstanding the above, it is recommended that a campus-wide Green Travel Plan be prepared to manage the future travel behaviour of staff and visitors to the Campus and identify appropriate travel demand management measures.</p>		<p>vehicle targets. Accordingly, this must be provided now.</p> <p>Similarly, it is logical that a Green Travel Plan for the RPAH campus is developed and implemented now, as this will assist in reducing demand for the proposed car park. The initiatives of the Green Travel Plan should be a matter for consideration when determining the likely parking demand for land uses not identified in Division 1 of Part 7 of the LEP.</p>

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<p>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.</p>			
BUILDING DESIGN			
Street Interface			
<p>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.</p> <p>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.</p>	<p>Lucas Street is primarily used as a pedestrian and vehicle thoroughfare. The interface between existing development and the laneway comprises of full height walls or facades of solid construction, with occasional driveway entrances and exits.</p> <p>This is reflected in the City of Sydney DCP map does not identify any boundary of the subject site for active uses.</p> <p>The context of the site therefore does not lend itself to the successful provision or integration of active uses on the site.</p>	No	The City's original comments remain unchanged.

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<p>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.</p>	<p>Furthermore, the very purpose of the development is to mitigate an existing need for vehicle parking spaces to serve RPAH staff. It would be an inefficient use of the hospital campus site to provide small scale retail offerings (and other such active uses) in place of valuable social infrastructure.</p> <p>It is noted that this MSCP will provide the opportunity for increased activity within this precinct of the hospital, when compared to the existing underutilise site, to promote passive surveillance and community 'policing'.</p>		
Building Expression			
<p>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.</p>	<p>A physical materials board has been prepared by Fitzpatrick + Partners and accompanies this response under separate cover.</p>	<p>No</p>	<p>The City has not been provided with a physical materials board as was requested.</p>

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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.	The overhang is approximately 130mm in depth, is rounded in the corner, and is generally obstructed by the planter bed (refer to the section at Attachment D). Accordingly, it is not deemed to be a safety risk.	No	The City's original comments remain unchanged.
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,	The potential impacts of light spill from the proposed development has been carefully considered during its detailed design: <ul style="list-style-type: none"> The perforations in the façade screens have a diameter of 	No	Amendments have not been made to the plans. Drawing DA-0204 depicts 'perforated metal A' as having perforation sizes in the order of 75-100mm.

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<p>as the scale of perforations does not provide any barrier to light spill.</p> <p>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.</p> <p>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).</p>	<p>10mm (rather than 75-100mm) and as such serve to limit the extent of light spill in the surrounding area.</p> <ul style="list-style-type: none"> • No parking bays have been located immediately adjacent or perpendicular to the southern façade. • The major bulk of the building has been pulled back from the western boundary to reduce the impact on the residents of Church St. The entry and exit ramps have a solid 1200mm high barriers to reduce light spill from entering/existing cars. • Solid panels are to be fixed to the crash barriers within the car park to further block out direct light. 		<p>As the applicant is not amenable to amending the application to address the City's reasonable concerns regarding the impacts of light spill, a light spill report should be prepared and submitted prior to determination of the application. The report should confirm that the proposed design will not result in unacceptable amenity impacts to nearby sensitive receivers.</p>
Overshadowing			
<p>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</p>	<p>With regards to the Queen Mary student Building, it is emphasised that the provisions of State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development (SEPP 65) do not apply to this student accommodation</p>	<p>No</p>	<p>The City's original comments remain unchanged.</p>

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<p>provide better amenity to living spaces rather than bedrooms.</p> <p>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.</p>	<p>development. This is reflected in the internal amenity standards that strictly relate to living rooms rather than bedrooms, which fails to consider the nature of compact student accommodation whereby bedrooms and living areas are combined.</p> <p>Accordingly, whilst it is best practice to consider the internal amenity of this property, as has been addressed in this section of the report, no standard can be applied under the legislation to the model of student accommodation. Consideration was given to mitigating the impacts on the QMB, including maximising the setback of the building, and minimising floor to floor heights to reduce as far as practicable the overall height of the building.</p> <p>Further excavation on the site to reduce the maximum height of the proposal was not feasible. It impacted entry to the MSCP, reduced natural ventilation at lower levels and in any case had marginal benefits to the overshadowing to QMB.</p>		

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Accessibility			
<p>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.</p> <p>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.</p>	<p>The required floor to floor heights to achieve compliance for accessible car spaces have been achieved with the existing design.</p>	<p>Partially</p>	<p>The Consent Authority must be satisfied that all accessible car parking spaces are in accordance with Australian Standards.</p> <p>If the Consent Authority was to consider granting development consent, a condition should be imposed to this effect.</p>
Crime Prevention through Environmental Design			
<p>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.</p> <p>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</p>	<p>The proposed development will incorporate CCTV cameras, in accordance with the recommendations of the CPTED report.</p>	<p>Partially</p>	<p>The Consent Authority must be satisfied that CCTV will be provided in accordance with the requirements of the CPTED report.</p> <p>If the Consent Authority was to consider granting development consent, a condition should be imposed to this effect.</p>

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<p>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 <i>"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"</i>.</p> <p>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.</p> <p>It is recommended that the design include CCTV cameras internally as recommended in the CPTED report.</p> <p>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</p>			

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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.	A detailed signage plan for approval is provided at Attachment E . In view of the limited scale and number of signs on the site, a signage strategy is not considered to be necessary.	Yes	Noted. A condition of consent should be imposed requiring the final content of the sign to be approved prior to the issue of a Construction Certificate.
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.	<p>An archival photographic record of the building has been prepared and will be made available to City of Sydney Council.</p> <p>It is emphasised that the demolition or redevelopment of the School of Nursing Building is not within the scope of this SSD application and therefore not a matter for consideration by the determining authority. Further, it was not a matter of concern for the Office of Environment and Heritage (OEH) who confirmed that the site does not contain any heritage issues</p>	No	<p>Site preparation works and the demolition of buildings on the site cannot be carried out without development consent. These works are clearly tied to the works proposed in this application. Clause 89E (5) of the <i>Environmental Planning and Assessment Act, 1979</i> states:</p> <p><i>"If a part of a single proposed development that is State significant development requires development consent to be carried out and the other part may be</i></p>

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<p>The City is of the strong opinion that the building should be retained and integrated into the new development.</p> <p>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.</p>	<p>that would require a formal OEH response.</p>		<p><i>carried out without development consent:</i></p> <p><i>(a) Part 5 does not apply to that other part of the proposed development, and</i></p> <p><i>(b) that other part of the proposed development is taken to be development that may not be carried out except with development consent."</i></p> <p>Accordingly, if NSW Health was to undertake a self-assessment under Part 5, and authorise those works, this would result in a breach of the Act. The Consent Authority should ensure that the applicant is aware of this, and ensure these works are brought into the scope of this SSD application.</p> <p>Further to the above, the School of Nursing is shown on the site demolition plan submitted with the application, and therefore forms part of the proposal.</p>

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			<p>The City's concerns regarding the demolition of the building are unaddressed.</p> <p>It is noted that the submission by the Office of Environment and Heritage erroneously states that there are no heritage items on the site. Given this error, the Consent Authority should be satisfied that the OEH does not object to the demolition of this heritage item prior to determination of the application, as they appear to be unaware of its existence.</p>
Archaeological potential			
<p>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.</p>	<p>An assessment of potential archaeological significant areas on the site was conducted as part of the demolition and site preparation works assessed under Part 5 of the EP&A Act, and as such does not fall within the scope of this SSD application. We recommend a standard condition be applied to the proposal, in accordance with the condition suggested by the Heritage Council of NSW (discussed below).</p>	<p>No</p>	<p>The proposal includes bulk earthworks that have the potential to impact upon archaeology.</p> <p>The requirements of the SEARs have not been met.</p>

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Impact to the Queen Mary Building			
<p>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.</p> <p>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.</p>	<p>Consideration was given to mitigating the impacts on the QMB, including maximising the setback of the building, and minimising floor to floor heights to reduce as far as practicable the overall height of the building.</p> <p>Further excavation on the site to reduce the maximum height of the proposal was not feasible. It impacted entry to the MSCP, reduced natural ventilation at lower levels and in any case had marginal benefits to the overshadowing to QMB.</p>	No	The City's original comments remain unchanged.

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LANDSCAPING AND PUBLIC DOMAIN			
Western landscape interface			
<p>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.</p> <p>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.</p>	<p>The proposed MSCP has been setback substantially from the Church Street frontage of the site, to align the proposed structure with the building line of the QMB to the east of the site. This landscape setback is more substantial and more accessible than the present treatment, and appropriately responds to linear planting spaces along this road frontage.</p>	No	The City's original comments remain unchanged.
Southern landscape interface			
<p>The QMB to the south has numerous residential windows facing the proposal. This will</p>	<p>The proposed development has been suitably designed so as to mitigate any</p>	No	The City's original comments remain unchanged.

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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.	potential private impacts for residents in the QMB. The façade screening prevents direct views into the student accommodation building so that the privacy of these residents can be maintained.		
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.	The proposed development will not result in a loss of child care spaces in the immediate area. As previously discussed, the GELG located 600 metres from RPAH has accommodated those children who were previously within the child care centre on the subject site. It is not considered appropriate or feasible to provide a child care centre on the roof of the proposed MSCP. (sic)	No	The response provided does not address the issue raised. The City's original comments remain unchanged.
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	Proposed Planting zone will be maintained within the boundary including any terrabond if utilised to ensure that the footpath maintains its	No	The City's original comments remain unchanged.

Issue	Applicant's Response	Issue Addressed?	City's Contention
<p>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.</p> <p>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.</p>	<p>maximum width between the existing kerb line and the boundary.</p>		