



15 August 2018

SWT18/00005  
SF2018/018983  
MM

The Manager  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Teresa Gizzi

**SSD-9033 – EXHIBITION - PROPOSED STAGE 3 OF REDEVELOPMENT OF THE WAGGA REFERRAL HOSPITAL, LOT 334 DP1190643, EDWARD STREET, WAGGA WAGGA, HW14.**

I refer to your correspondence regarding the subject application which was referred to the Roads and Maritime Services for assessment and comment.

The proposal for stage 3 of the redevelopment of the Wagga Wagga Hospital site is supported by an Environmental Impact Statement (EIS) dated June 2018 prepared Ethos Urban and a Traffic Impact Assessment (TIA) prepared by GTA Consultants dated June 2018.

The subject site is located on the south eastern corner of the intersection of Edward and Docker Streets. The hospital site is part of a wider existing health care precinct which includes the nearby Calvary Hospital and multiple private medical practices and clinics. The Wagga Wagga Base Hospital site has frontage to Edward Street which forms part of the Sturt Highway (HW14) and to Docker Street which forms part of the Wagga Wagga – Holbrook Road (MR 211) which are both classified roads under the provisions of the Roads Act, and to Yathong Street, Yabtree Street, Doris Roy Lane, Rawson Lane, Peck Street and Lewis Drive which are classed as local roads. As Edwards Street is part of the Sturt Highway it currently carries a high proportion of heavy vehicles.

The current proposal is for stage 3 of the redevelopment of the hospital site. Previous stages of the redevelopment of the hospital site are either complete or nearing completion. From the information provided it is understood that stage 3 proposes the construction of a new 6 storey building on the hospital site to house:

- Ambulatory Care services,
- Renal dialysis unit,
- Aged care and mental health beds,
- Dental and GP services/consultant areas,
- 60 bookable interview/consulting rooms,
- Education area providing library, conference facilities catering for 60 seats and a 100 seat lecture theatre,
- Plus office accommodation for support services and staff,
- Revised parking and access arrangements to the surrounding road network.

The Wagga Wagga Base Hospital functions as a regional facility which services a broad regional area surrounding Wagga Wagga. Therefore the hospital site is accessed by persons familiar with Wagga Wagga and the hospital site and persons who access the facility infrequently and with little knowledge of the site, or its location within Wagga Wagga. Often people accessing hospital facilities do so during times of duress. Therefore the development needs to provide appropriate facilities for the convenient and safe movement of people (not just vehicles) to and from the hospital site, ease of circulation and navigation ("way finding") within the site and appropriate and convenient parking provision.

The TIA focuses on the need for works at the intersection of Edward and Murrays Streets. The TIA includes repetitive claims that improvements to the intersection of Edward and Murrays Streets such as signalling the intersection are based on forecast growth in traffic in the area and not as a result of the stage 3 development. However the study fails to acknowledge the hospital as a significant traffic generator in the surrounding precinct or the impacts of the cumulative redevelopment of the hospital on that intersection. Reference is made to the Wagga Wagga Base Hospital Redevelopment – Traffic Summary Report dated September 2013 prepared by Mott MacDonald prepared in respect to stage 2 of the redevelopment of the hospital site. This report acknowledged that the redevelopment of the hospital site would generate additional traffic through the intersection of Edward and Murray Streets.

The TIA claims that the current intersection configuration of Edward Street and Murray Street would operate beyond its capacity under 2027 traffic conditions even without the additional traffic generated by the proposed development. To address this issue the TIA identified the need for the intersection of Edward Street and Murray Street to be signalised in the future by Council/Roads and Maritime due to general growth. What the report fails to do is acknowledge that the past and proposed redevelopment of the site contributes to the traffic loading through the surrounding road network and that the proposed development will accelerate the need for works at the intersection to accommodate the expected growth plus the additional loading due to the redevelopment of the hospital.

Notwithstanding the above claim the TIA acknowledges the need to undertake interim works by the construction of median treatments in Murray Street and Brookong Avenue at their intersection with Edward Street to deny right turn to Edward Street. The report claims that the proposed turn restrictions will serve as an interim access management strategy to improve the safety of these intersections prior to signalling the intersection of Murray and Edward Streets. The TIA does not appear to consider the downstream effects of such treatments on the road network or movement within the surrounding precinct particularly to head to the east towards the Central Business District from the site. The TIA, in its Executive Summary, acknowledges that such a change would need further assessment to be completed in response to the Request for Information (RFI), to be submitted to Roads and Maritime and Council for approval. In this case the TIA appears to suggest a solution but states that the assessment of the impact of such a change on the broader road network is still to be undertaken.

In summary the recommendations of the TIA for stage 3 of the hospital redevelopment are;

- Northbound right-turn restriction at the intersections Murray Street/ Edward Street and Brookong Avenue/ Edward Street.
- Southbound right-turn restriction at the intersection Murray Street/ Edward Street.
- Reconfiguration of the signalised treatment at the intersection of Docker Street and Edward Street.

Whilst the assessment of the traffic implications for the individual stages of a development may not be considered to represent significant traffic impacts when compared to existing traffic levels within the nearby road network, it is the cumulative impact of the whole redevelopment and the anticipated traffic generated by the finished hospital establishment that needs to be considered, not a single stage in isolation.

Given the scale of the redevelopment of the hospital facility and its potential impacts on the road network a Traffic Impact Assessment to address the implications of the generated traffic and its impacts on the surrounding road network within the precinct, not just nearby intersections, would be appropriate. Roads and Maritime had advised of this requirement at the outset of the redevelopment project. The Traffic Impact Assessment submitted with the current proposal appears to be limited to the impacts of stage 3 only and undertakes traffic modelling to year 2027. It is understood that the proposed stage 3 works are anticipated to be completed in 2020/21.

The traffic impact assessment and any required mitigation measures should not simply focus on providing a satisfactory level of service (LOS) at intersections at commencement of operation and shortly thereafter, but should have regard for the anticipated growth in the traffic generation due the development and the expected growth within the surrounding road network for a period consistent with the life of the development. Documents such as the Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development identify that a design life of 10 and 20 years after the completion of a development is often adopted for larger developments.

Parking requirements for such a facility are variable across the state depending on the ancillary services provided at the site and the availability and utilisation rates of public transport. The proponent may be the best authority to quantify realistic parking requirements for such facilities given their involvement in the development and operation of other regional hospital facilities. On-site parking has been an issue for the current hospital facility and parking demands of the current hospital have overflowed into the surrounding residential area and road network. The current hospital facility has a history of complaint due to insufficient parking provision.

It is apparent from the submitted information that the redevelopment relies on on-street parking within the surrounding road network. As a result pedestrian access and pathways from the external road network for staff and the general public needs to provide for convenient and safe access for all levels of mobility. Consideration for night time access is required as the hospital operates 24 hours. As development relies on available on-street parking on the northern side of Edward Street and in Murray Street north of Edward Street safe pedestrian access to the hospital site across Edward Street needs to be addressed.

The need for additional parking is also supported by the masterplan submitted as part of the EIS for the stage 3 redevelopment which identified an area at the northern end of the site for a decked carpark. It is understood that the feasibility and design for the decked carpark is currently being prepared. The construction of this facility will also cause an incremental impact on the traffic generation of the hospital site as it will further concentrate traffic to the hospital site.

Results of a survey of travel patterns of hospital staff undertaken in 2007 revealed that greater than 85% of staff travelled to work by car and 11% either walked or cycled. A high proportion of the car travel was by single occupancy vehicle. These figures are generally consistent with the 2006 ABS data for travel patterns within Wagga Wagga. This usage pattern impacts on traffic generation and parking demands resulting from the development. It is noted from applications for previous stages that the hospital intends to promote alternative modes of transport to the site for its staff.

The TIA states that the hospital site provided for a number of spaces as at the time of survey in December 2017. Due to the time period and number of parking surveys undertaken it does not appear to provide a comprehensive view of the parking utilisation or availability within the site or the surrounding road network. The current proposal claims the creation of 107 additional parking spaces to be provided on site. The documentation fails to acknowledge that some of the transportable buildings that have been placed on the site to accommodate the construction works of the various stages of the redevelopment have occupied areas that were previously parking. On a minor note it appears that the vehicle wash bay proposed in the small carpark fronting Docker Street is included as a carspace in the total number of additional spaces created by the development.

Ease of pedestrian access and circulation to, and within, the site needs to be addressed as part of the proposal. Pedestrian movement paths and desire lines to the building need to be obvious and safe with minimal potential for conflict with vehicles. Pedestrians accessing the site may be regular users of the facility or may have little knowledge of the site. A strategy needs to be developed to provide for pedestrian access to and within the site.

Further to consideration of vehicular and pedestrian traffic the changes to the intersection of Murray and Edward Street proposed by the TIA should also consider its impacts on other traffic movement issues such as Council's bikeway plans which identifies Murray Street and its intersection with Edward Street as a major cycling avenue to the central parts of Wagga Wagga.

Roads and Maritime encourages the adoption of practices relating to the use of alternative modes of transport to the private vehicle. The concept plan indicated the intention to provide quality and connected pedestrian and cycle facilities. The following matters should be addressed and included as conditions of consent:

1. Develop in consultation with local council a scheme restricting parking on residential streets in the walking catchment of the hospital;
2. Develop a pedestrian access and circulation plan for access to the building entrances from the identified parking including that within the local streets;
3. Develop a cycle access and circulation plan including the connections to the surrounding cycle network (existing and planned) and the access points aligned with the proposed location of the end-of-trip facilities;

Due to the proposed access routes to the hospital site and the anticipated traffic generation it is considered that the road network within the surrounding precinct, particularly Murray Streets, and its intersection with Edward Street, need to be assessed with acknowledgement of the traffic loadings resulting from the whole redevelopment and appropriately treated to safely manage the increased traffic levels. To further increase the volume of traffic (both vehicular and pedestrian) through this intersection without appropriate intersection treatment will increase the potential for serious incidences at this intersection. The intersection of Murray and Edward Street currently has a crash history. The proposed treatment to deny right turn from Murray Street as proposed does not address the potential traffic issues.

The development should be conditioned to upgrade the intersection of Edward and Murray Streets with consideration for both vehicular and pedestrian traffic however the selection of the appropriate treatment and the level of contribution towards such works will require further investigation and discussion between the proponent, Roads and Maritime Services and the Wagga Wagga City Council.

Roads and Maritime Services acknowledges the importance of the redevelopment of the Wagga Wagga Base Hospital given the benefits to the wider community and supports the proposal however requests that the issues outlined above be considered and addressed with the objective being to recognise the impacts of the development and provide a network within the surrounding precinct to appropriately accommodate the traffic (vehicular and pedestrian) demands placed on it as a result of the expansion of the hospital for the life time of the facility.

The hospital site and its redevelopment is a major contributor to the traffic volumes and flows within the surrounding network. Notwithstanding this Roads and Maritime acknowledges that this site and its redevelopment is not the only influence on traffic in the precinct. Roads and Maritime Services is in the process of preparing and undertaking consultation with the community regarding the intersection of Edward and Murray Streets. This consultation and preliminary analysis of the results is anticipated to be completed within about 6 weeks from the date of this letter

Given the timeline for the community consultation proposed to be undertaken by Roads and Maritime and the acknowledgement of the TIA that further assess the traffic implications is required it may be appropriate to allow for the completion of the community consultation period when other influences such as public expectation regarding the intersection of Murray and Edward Street can be considered with greater certainty. This approach may be appropriate for such a development given its scale and importance to Wagga Wagga subject to an undertaking by the proponent to undertake further assessment of the road network within the surrounding precinct and provide appropriate works to address the impacts on the road network within the immediate precinct required as a result of the finished development to the satisfaction of Wagga Wagga City Council and Roads and Maritime Services.

Further to issues raised above should consent be granted to the development as proposed Roads and Maritime Services provides the following items as conditions for the consideration of the consent authority in relation to the current proposal for the redevelopment of the hospital facilities.

1. Right turn for vehicles from Lewis Drive to Edward Street is to be denied. The raised median in Lewis Drive at its intersection with Edward Street (the Sturt Highway) is to be reconstructed to deny right turn from Lewis Drive. This turn restriction is to be appropriately signposted at the intersection and within the subject site. The median is to be designed and constructed in accordance with the Austroads Guide to Road Design as amended by the supplements adopted by Roads and Maritime Services.
2. The intersection of Murray Street with Edward Street is to be treated to the satisfaction of the Roads and Maritime Services to maintain a Level of Service C or better in year 20 after completion of stage 3 of the development. The intersection treatment is to be designed and constructed in accordance with the Austroads Guide to Road Design as amended by the supplements adopted by Roads and Maritime Services.
3. Changes to the traffic signals and lane configuration at the intersection of Edward and Docker Street are to be to the satisfaction of Roads and Maritime Services.
4. Appropriate pedestrian treatment shall be implemented to provide convenient and safe pedestrian access across Edward Street from parking on the northern side of Edward Street to the satisfaction of Council and Roads and Maritime Services.
5. The Sturt Highway (Edward Street) is part of the State Road network. For works on the State Road network the developer is required to enter into a Works Authorisation Deed (WAD) with Roads and Maritime Services before finalising the design or undertaking any construction work within or connecting to the road reserve. The applicant is to contact the Land Use Manager for the South West Region on Ph. 02 6938 1111 for further detail.
6. Works within the road reserve of a classified road will require concurrence from Roads and Maritime Services under section 138 of the Roads Act 1993 prior to commencement of any works. The developer is responsible for all public utility adjustment/relocation works, necessitated by the proposed development and as required by the various public utility authorities and/or their agents.
7. A Traffic Management Plan shall be prepared for construction and demolition activities and submitted prior to the commencement of works. The management plan is to address access and parking and maintain safe access for pedestrians and cyclists and access and parking for vehicles to meet the continued operational needs of the current hospital facility. The Plan shall include, but not be limited to, the following matters which are to be addressed by suitably qualified person(s):
  - i) Strategies to manage traffic volumes and movement anticipated during construction and demolition.
  - ii) management of loading and unloading of materials on the site and not from the adjoining road reserves;
  - iii) Identify strategies for the provision of displaced on-site parking during these activities
  - iv) Identify strategies and procedures for the parking of construction worker vehicles that will minimise impact on existing parking requirements within the area.
  - v) measures to minimise the impact of construction traffic on the surrounding road network including the restriction on access for large vehicles during the morning and afternoon peak traffic periods from and/or to Edwards Street and Docker Street.
  - vi) Complaint management and contingency measures.
8. All works associated with the proposed development shall be at no cost to Roads and Maritime Services.

Further to issues raised in the preceding Roads and Maritime Services provides the following items for the consideration of the consent authority in relation to future proposal for the redevelopment of the hospital facilities

- a. Any off-street car park associated with the redevelopment of the hospital including driveway design and location, internal aisle widths, ramp grades, parking bay dimensions and loading bays are to be in accordance with AS 2890.1-2004 "Off-street car parking" and AS 2890.2-2002 "Off-street commercial



vehicle facilities” and in a manner to allow all vehicles to be able to enter and exit the subject site in a forward direction.

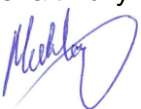
- b. Pedestrian access into the site is to be provided separate to the vehicle driveways and is to cater for all forms of pedestrian mobility. Landscaping and/or fencing are to be provided along the frontages of the site to the public roads to direct pedestrians to the defined pedestrian access point. Pedestrian linkages within the site shall be easily recognisable and provide for convenient and safe access with the site and to the adjoining road reserves.
- c. Traffic calming devices are to be installed within the subject site to minimise conflict between pedestrians and vehicles within the subject site. Pedestrian crossing stripes are not to be placed in the site as these resemble pedestrian crossings on the road and creates confusion as to who has priority.
- d. Appropriate directional signage and line marking is to be installed and maintained throughout the hospital site to enforce the required directions of vehicle travel through the site and to assist in directing vehicles around and through the facility.
- e. All lighting for the illumination of carpark and pedestrian areas shall comply with AS1158 – “Lighting for roads and public spaces” and AS4282 – “Control of Obtrusive Effects of Outdoor Lighting”. Details demonstrating compliance with these requirements are to be submitted to the satisfaction of the certifying Authority prior to the issue of a Construction Certificate.
- f. The provision of on-site car parking, including disabled parking, associated with the subject development is to be in accordance with Council requirements. All car parking spaces required by the development are to be provided on-site and not to be compensated by the on-road parking in the vicinity. Parking, particularly disabled parking, is to be located with convenient pedestrian access to the entry doors of the premises.

Please be advised that under the provisions of the Environmental Planning & Assessment Act it is the responsibility of the Consent Authority to assess the environmental implications, and notify potentially affected persons, of any development including conditions.

Any enquiries regarding this correspondence may be referred to the Manager, Land Use for Roads and Maritime Services (South West Region), Maurice Morgan, phone (02) 6923 6611.

**Please forward a copy of the Notice of Determination for this Development Application to the Roads and Maritime Services at the same time as advising the applicant.**

Yours faithfully



Per:  
Jonathan Tasker  
Acting Director  
South West NSW