

19 March 2015

The Secretary  
Department of Planning & Environment  
GPO Box 39,  
Sydney NSW 2001

Attention: Megan Fu

Dear Ms Fu,

### Response to Submissions for SSD 6848 - Stage 3B of Lismore Base Hospital

Further to your letter of 18 March 2015, Health Infrastructure (HI) has reviewed the submissions received resultant from the exhibition of the above application. Submissions were received from the following parties/agencies:

- i. Lismore City Council (LCC);
- ii. Roads and Maritime Services (RMS);
- iii. Transport for NSW (TFNSW);
- iv. Baptist Care NSW & ACT (who owns and operates a residential village (Illowra Place) on the corner of Dibbs & Dalziell Streets Lismore);
- v. The Environment Protection Authority (EPA);
- vi. Barbara Walsh;
- vii. Jac Biersteka; and
- viii. CASA

The following table provides a summary of the issues raised in these submissions and HI's response.

From	Issue	Response
LCC	<b>Carparking Management Strategy</b> Council raises concerns regarding the preparation of a Carparking Management Strategy (CMS). The EIS proposed for this to be undertaken prior to the occupation of Stage 1 of the proposed carpark. Council also notes that the CMS recommendations need to be developed in sufficient time for implementation within the surrounding residential areas and needs to consider the costs of enforcement of its recommendations. Council states that conditions issued for the proposal should provide certainty about these matters and ensure that the community and Council have a clear understanding of expectations at least 2 months prior to the intended date for operation of the carpark to commence.	<p>As identified by Council, the EIS included a mitigation measure stating that a CMS will be prepared prior to occupation (Stage 1 initially). To respond to Council's concerns, HI agrees to a condition of consent requiring the CMS be prepared and issued to Council for review at least two (2) months prior to the operation of Stage 1 of the carpark.</p> <p>HI will undertake discussions directly with Council regarding costs of enforcement of the CMS.</p>

Health Infrastructure  
ABN 89 600 377 397

Level 6, 77 Pacific Hwy, North Sydney NSW 2060  
PO Box 1060 North Sydney NSW 2059  
Tel. (02) 9978 5402 Fax. (02) 8904 1377  
Website: [www.hinfra.health.nsw.gov.au](http://www.hinfra.health.nsw.gov.au)

LCC	<p><b>Uralba Street Pedestrian Crossing</b></p> <p>LCC's submission states that Council's Traffic Committee is concerned that the concentration of parking in the proposed station will lead to a significant increase in pedestrian traffic across Uralba Street and at the entry to the hospital and that this will potentially adversely impact on the vehicular traffic flow in Uralba Street. Council requests that a condition be implemented in the issue of any consent notice for the development to require a review of pedestrian modelling, thresholds/traffic warrants etc, following commencement of the operations of the completed development in regard to pedestrian usage of the Uralba Street crossing.</p>	<p>HI's consultant, TTW has considered this submission and responds as follows (per Attachment 1):</p> <p><i>"The current Marked Pedestrian Crossing (MPC) along Uralba Street which is located within 25m from the new car park is currently providing and will continue to provide an appropriate facility for a safe pedestrian crossing across Uralba Street. This is supported by the current situation as many Hospital users currently use on street parking along streets south of Uralba Street while utilising the existing MPC. Therefore, the level of pedestrian movements will not be much different from the existing condition. It should be noted that the existing MPC along Uralba Street is along the pedestrian desired line as it is directed towards the main Hospital buildings.</i></p> <p><i>Installation of a Traffic Control Signal (TCS) could have a major implication on traffic flows along Uralba Street".</i></p> <p>HI's consultant (TTW) has also provided more detailed analysis of the warrants and this is provided in Attachment 2.</p>
LCC	<p><b>Little Uralba Street</b></p> <p>Council raises concerns with regard to the four (4) residences in Little Uralba Street which will no longer have direct access to Uralba Street due to the proposed road closure. Council notes that these residents, together with the general public, will require the construction of a "turning area" where Little Uralba Street is closed off for hospital purposes. Council states that <i>"the current proposal makes no provision for the orderly turning of non-hospital related traffic that may be using the northern part of Little Uralba Street. Council requires that prior to the closing of Little Uralba Street, for hospital purposes, a cul-de-sac or hammer head turning area be constructed on the public road".</i></p>	<p>Provision for turning will be provided to Little Uralba Street in the detailed design phase. The design will be developed in consultation with Council and will be implemented prior to the closure of Little Uralba Street, whichever occurs first. HI would accept a condition of consent along the lines of the comment above.</p>
RMS	<p>RMS states that based on the information provided, the necessary traffic volume to warrant the installation of TCSs at the junction of Uralba and Little Uralba Streets may not be met. RMS suggests that road safety requirements along the length of Uralba Street should be further considered.</p>	<p>HI's consultants, TTW has provided the following response to this issue raised by RMS:</p> <p><i>"As the letter has also recognised, there would be a very low level of vehicular traffic associated with Little Uralba Street which would not warrant installation of TCS. The implementation of such measure would also have an impact on the operation of Uralba Street. Considering the low level of vehicular</i></p>



		<p>movements from and to Little Uralba Street, appropriate operational management of service vehicles will be implemented by the Hospital to ensure that most activities take place outside the peak hour periods. In the event that traffic management signals are required for truck movements, these would be located within the Hospital site."</p> <p>HI's consultant (TTW) has also provided more detailed analysis of the warrants and this is provided in Attachment 2.</p>
RMS	<p>"Roads and Maritime supports Council's view in relation to the need to maintain traffic flow along Uralba street whilst ensuring the safety of pedestrians using the marked pedestrian crossing. Due to the construction of the new multi-storey carpark a uniform pedestrian desire line will likely emerge across Uralba Street. There may be a need to install a traffic control signal on Uralba Street to facilitate safe and efficient pedestrian movements. Alternatively an overpass may be more appropriate. It would be desirable to further consider the merits of the available options to identify future requirements and appropriate trigger points to ensure any impact on pedestrian safety or traffic efficiency is adequately addressed."</p>	Refer to comment above in response to Council.
RMS	<p>"All service vehicles should be required to enter and leave the servicing area in Little Uralba Street in a forward manner. Reversing along or across a public road is not supported It may be appropriate to consider implementation of a Traffic Management Plan to manage this activity."</p>	The current design allows all vehicular movements onto Uralba Street to be carried out in a forward direction".
RMS	<p>"In accordance with the Delegation to Councils for the Regulation of Traffic the installation of any regulatory devices on local roads or within road related areas, including marked pedestrian crossings and parking signs, require the endorsement of the Local Traffic Committee (LTC) prior to Council approval."</p>	Noted.
TFNSW	<p>"Although recognised in the Traffic and Parking Review for Stage 3A, the SEARs requirement for a Travel Plan was not provided in the Stage 3B supporting documentation. TfNSW suggests the proposed Stage 3B provide a Sustainable Travel Plan and Transport Access Guide, endorsed by the</p>	A Sustainable Travel Plan and Transport Access Strategy will be developed in consultation with LCC and other relevant authorities. The Plan will include the review, assessment and analysis of the site in terms of accessibility with regards to public transport, bicycle and pedestrians. This will be complete prior to final occupation of the

	<i>Lismore City Council Traffic Advisory Committee as a condition of development approval".</i>	development.
TFNSW	<i>"...the adequacy of an at-grade zebra crossing to service a 560 space carpark for Lismore Hospital has not been demonstrated, as required in the SEARs". "TfNSW suggests the applicant provide an analysis demonstrating the adequacy of the existing zebra crossing to safely provide pedestrian access to the new hospital car park. The analysis should consider the AM and PM peak periods as well as the peak period of the hospital's trip generation for existing, Stage 3A and Stage 3B conditions." "The methodology should be approved by Roads and Maritime Services. If justified, appropriate mitigation measures and timing of mitigation measures should be identified."</i>	Refer to earlier comments in respect to the existing pedestrian crossing and the attached letters from TTW as applicable.
Baptist Care	Baptist Care requested landscaping of the "open space between [their] development and the car parking station". Baptist Care also notes that provision of landscaping in this area would assist with providing acoustic treatment to reduce traffic noise and air borne pollution from the operation of the carpark.	We assume the "open space" referred to is the grass verge/island located to the south of the site which is not under the ownership of HI. For this reason no works are proposed within this open space area. Landscaping is however proposed within the front setback zone to the Dalziell Street frontage to assist in "softening" the visual bulk and scale of the development.  In terms of the acoustic issues raised, we refer to the acoustic assessment report prepared by Acoustic Logic and accompany the EIS which concludes that providing the recommendations are adopted, noise emissions from the operation of the site will comply with the relevant acoustic criteria. Further, landscaping is not typically a mechanism used to attenuate noise and HI does not envisage the operation of the carpark will result in any adverse pollution or impact on residential amenity.
EPA	The EPA did not raise any concerns regarding the proposal and simply advised that conditions of consent should take into account the need to manage issues of water, noise and dust management during construction.	This is a matter for the consent authority. The EIS included mitigation measures that may be implemented as conditions of consent to ensure that potential impacts during construction are managed and mitigated.
Barker	<i>"Vehicular access to and from my residence has been regularly restricted during the current 3A build and I am concerned that this will increase during Phase 3B construction. There are no alternate parking facilities available as all surrounding parking is</i>	HI has consulted directly with this landholder prior to submission of the application whereby impacts such as those raised were discussed.  As set out in the preliminary construction management plan prepared by Aurora



	<i>either restricted 2 hour, paid parking or utilised by workers associated with the build and hospital staff and visitors."</i>	<p>Projects and accompanying the EIS, minimal on-site parking (and in Little Uralba Street) will be provided for construction traffic due to physical site constraints for amenities, scaffolding and materials handling.</p> <p>HI will continue to work with the community to implement solutions to minimise impacts.</p> <p>Consideration has also been given to a temporary carpark for construction on the Little Uralba Street properties under ownership by HI.</p>
Barker	<i>"The area is front of my residence is often used as an early morning workman's assembly point, smoking zone/cigarette butt and empty coffee cup depository. My concern is that this will continue into Phase 3B."</i>	<p>Noted but not directly relevant to the proposed Stage 3B development. HI will actively continue to work with the Contractors to minimise impacts on the local community including any anti-social behaviour such as that raised by this resident. Signage and toolbox talks to contractors may form part of this strategy.</p>
Barker	<i>"The EIS for 3B outlines the plan to plant large trees along the northern border with my property in the landscaping phase, once the loading dock and turning bay have been completed. This will completely remove the little remaining view I have following the completion of Phases 3A/3B."</i>	<p>The "views" referred to are neither iconic nor significant. Landscaping along the southern boundary of the proposed manoeuvring zone will assist in mitigating any adverse visual impact of the activities that will be undertaken within the manoeuvring zone.</p> <p>HI will work with the landholder to minimise impacts.</p>
Barker	<i>"The EIS makes the claim that a helicopter taking off and landing only emits the same level of dBs as a fire truck siren. My concern is that this is not the case, particularly after hours."</i>	<p>Whilst this concern is noted, the acoustic report prepared by Acoustic Logic states that the "predicted worst case scenario noise level of approximately 90dB(A) at the residences is slightly less than what may be expected in the event of a police car/fire truck with siren (or other emergency vehicle) passing by a residential property at a distance of approximately 10m at ground level". HI defers to the expertise of Acoustic Logic on this matter.</p>
Barker	<i>"There have been interruptions to my electricity supply during the current 3A phase and I have been informed that the power pole which supplies electricity to my residence is to be removed. If this is the case I would like to know the alternate arrangements for power supply to my residence."</i>	<p>Interruptions to electrical supply are a consequence of the Stage 3A works and have largely been completed. Prior to this occurring, the project team did correspond with the resident in the form of letter box drops. HI understands that Essential Energy has been undertaking their own upgrades to the system in the area which have increased frequency of power outages. The project team will continue to consult with the residents if and where power outages are likely to occur, including reducing the timeframe of their impact.</p>
Beirsteka	<i>"Diagrams of the retaining wall indicate it would be 2.3 metres above the level of</i>	<p>Amendments are able to be made to the retaining wall at the northern extent of the</p>



	<i>the turning bay surface. Discussion reveals they may be 1.5 metres. I request that the wall be heightened to 1.8 metres to help reduce vehicle noise and fumes and to provide more adequate privacy screening."</i>	proposed manoeuvring area for the loading dock to ensure that it is 1.8 metres high in response to this submission. This may be through increasing the height of the wall, introducing fencing to this height or similar measures. This may be facilitated through a condition of consent requiring a design amendment in the detailed design documentation prior to construction.
CASA	Nil Comment	Noted

In addition, the Department of Planning and Environment has requested further information regarding the:

1. Car Parking Management Plan;
2. Warrants for Traffic Control Signals at the Uralba St Crossing; and
3. Additional plans showing Stage 1 of the car park.

### Car Parking Management Plan

The Lismore Hospital Car Park is being developed to provide car parking for hospital users and staff along with alleviating impacts of on street car parking among local residents.

The Lismore Hospital Car Park fees are consistent with the Hospital Car Parking Fees Policy endorsed by the Minister in May 2013 (PD2013\_031). This policy generally notes that fees will be used to fund new car parks. These fees are to be determined on a site by site basis.

The fee structure for this car park considers a mix of staff parking fees (generally noting weekly payments), public fees (generally on hourly basis) and concessional parking (free parking for a group of users along with a mix of multi-day passes).

Parking management be supplemented by a Resident Parking Scheme based on an agreement that will be established between Lismore City Council and Health Infrastructure.. This agreement broadly considers:

- The methodology for managing the community with regards to its installation; and
- Infrastructure to allow policing of the scheme.

Health Infrastructure will work with Lismore City Council to finalise the plans regarding this scheme including its extent, however the objective of this scheme is to alleviate parking pressure on the local residents by drawing users and staff to the new multi-storey car park.

### Warrants for Traffic Control Signals

Health Infrastructure's traffic consultant (TTW) has reviewed the warrants for traffic control signals at Uralba St. Their analysis is provided in the attached letter (Attachment 2). It is noted that the vehicle traffic along Uralba St and pedestrian flows do not meet these warrants and therefore traffic control signals are not included as part of this proposal.

### Stage 1 of the Car Park

Health Infrastructure has included with this letter (Attachment 3) a number of additional drawings outlining each level of the car park and selected elevations for Stage 1 of the car park for the benefit of the Department.

## Conclusion

The responses set out in this letter above address the issues raised in the submissions lodged during exhibition of the subject application. HI does not believe that any amendments to the proposed development application are required in order to deal with these issues. As a result HI trusts that the above information assists in finalising your assessment of this application in the near future.

Yours Sincerely,



**Sam Sangster**  
Chief Executive Officer

## *Attachments:*

1. Letter from TTW to HI, 9 March 2015
2. Letter from TTW to HI, 18 March 2015
3. Car Park Stage 1 Drawings
  - a. Level 1
  - b. Level 2
  - c. Level 3
  - d. Level 4
  - e. Level 5
  - f. Elevations