

Royal North Shore Hospital



Concept Plan Application

Response to Submissions



November 2006

Prepared for: Burns Bridge Services on Behalf of NSW Health

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1 Introduction

On 8 March 2006 the Minister for Planning:

- Agreed that the project constitutes a 'Major Project' under the terms of the 'Major Projects' State Environmental Planning Policy (SEPP), and is therefore the approval authority for the project;
- Authorised the submission of a Concept Plan; and
- Agreed to consider the site as a potential State Significant site for listing under Schedule 3 of the Major Projects SEPP.

This report represents the applicant's response to submissions made during the public exhibition of the Concept Plan for the Royal North Shore Hospital. The Concept Plan was publicly exhibited from Wednesday 2 August 2006 to Friday 1 September 2006 in accordance with Part 3A specifically; section 75H of the Environmental Planning and Assessment Act, 1979 (EP&A Act).

The project involves the development of new 'state of the art' hospital facilities on the RNS Campus to meet the changed clinical needs of modern health care. Surplus land released by the consolidation of health facilities will provide opportunities for the development of complementary services and retail, office and residential development by the private sector to support the new health facilities and contribute to their funding.

Selected copies of the submissions to the Department of Planning were made available to the Department of Health (DoH; the Proponent) in accordance with Section 75H(5) of EP&A Act.

In addition, the Department of Planning provided a summary of all submissions in a spreadsheet format with separate sheets for key stakeholders and public submissions. The Department of Planning summary draws out common issues raised within the submissions.

The Department of Planning's summary of public submissions is located at Appendix A.

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2 Key Stakeholder Submissions

There were a total nine submissions received from State or local government, including the Department of Planning (please refer to Appendix B for submissions).

The Department of Planning have been responded to via a separate letter (please refer to Appendix C). A summary of the comments made by the relevant submitters have been provided below along with a response from the proponent.

No	Date	Submitter	Nature	
1	4.09.2006	Willoughby City Council	None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Information in Concept Plan document is considered to be inadequate when assessing impacts on surrounding locality No guidelines for built form on buildings facing Herbert Street, Gore Hill Park. Council seeks quality streetscape outcomes. Scale of building of Gore Hill Park is 13 storeys, overbearing visual impact. Buildings at 207 Pacific Highway step from park. Building at 4b (14 storey) have a great impact, overshadowing, visual amenity, inadequate set back. Concerned about sale of public land for public benefit to accommodate local benefits Section 94 contributions to be spent on local area. Fixed levy 				<p>Extensive contextual information is provided and surrounding locality described in detail. No specific impact of concern identified.</p> <p>Height, street edge activity, setback and street alignments specified. An additional 4 metre articulation zone to Herbert Street frontage of Precinct 4 now added.</p> <p>Proponent committed to quality streetscape outcomes.</p> <p>13 storey buildings consistent with established scale of locality</p> <p>Concept Plan steps back from park in accordance with sun planes upon which proposed heights are based.</p> <p>Consistent with adjacent buildings at 207 Pacific Highway and urban context.</p> <p>In accordance with SEPP 8, identified surplus land is being rezoned for orderly and economic redevelopment.</p> <p>Separate Planning Agreement is being negotiated.</p>

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- of 1% to 2% for non-hospital related development.
- Building 1b is on Gore Hill Park land.
- Car parking in the northern section of Gore Hill Park should be returned to open space.
- Inadequate relationship between proposal and Gore Hill memorial cemetery.
- Dedication of land in precinct 7 for loss of land in Gore Hill Park is not an appropriate trade off. Council see a greater benefit in the park as a single open space area.
- Heritage retention is supported but should include the chimney.
- Community facility size and location is inappropriate.
- 4m set back at Herbert Street is inappropriate. Require 12m to create tree lined boulevard.
- Creation of high wall effect along Herbert Street not recommended. Site should be more permeable.
- Community and mental health facilities to be reinstated at Hercules Street.

A small amount of the northernmost portion of Gore Hill oval lands are required for the road and 'park and dash' parking to service the Emergency and Maternity departments. This will, to some extent, be offset by Health returning some of its surplus lands to the Oval. As little land as possible will be taken.

Unjustified.

All proposed new development is separated from the cemetery by Gore Hill Oval and the remnant hospital site. No new hospital buildings are proposed adjacent to the cemetery.

No such trade off is proposed.

In view of other items retained, the growth targets of the metro strategy and the constraints that chimney retention would impose, the proponent does not propose retention.

Proposed community facility now increased from 100m² to 250m².

12m 'boulevard' set back is inappropriate for an area trying to knit itself into the urban framework of St Leonards CBD. Street wall to Herbert Street is well defined by the sun plane height control, new street openings and Precinct 7 open space

However, an additional 4m articulation zone is now proposed for the Herbert Street frontage of Precinct 4 and the Precinct 7 setback is been increased to 8m.

See above

Location of community and mental health facilities is an operational matter for the Department of Health, not a consideration under the EP&A Act.

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- No inclusion of aged care housing.
- Up to 50% adaptable housing required.
- Determination 10,000m² of affordable housing.
- Location of childcare facility should be accessible to all land users.
- Bulky goods retail uses will create a strain on the traffic/road network.
- No commitment by bus operators to provide additional services to site.
- Westbourne Street should remain closed to avoid through traffic.
- Traffic signals at Herbert Street and Westbourne Street would create a 'rat run' between Artarmon and Pacific Hwy industrial area.
- Lack of detail in internal road network.
- Bicycle route through site does not link other routes in local area.

Aged care is permissible in residential precincts and proportion will be determined at project application stage. Even if not specifically designed as 'Seniors Living', all housing will be suitable for older people, being close to hospital transport, retail and other facilities and with direct level access to lifted buildings.

Adaptable housing now increased from 10 to 15%, in accordance with recent approval of Chatswood Interchange development

10,000m² is a substantial proportion of the total housing proposed and there is no requirement for any.

Agreed. To be confirmed in planning agreement

Bulky goods no longer proposed, but could be defined as permissible 'shops' in any event.

Optimal bus access sought by proponent, but at the discretion of service providers.

From an urban design and traffic planning point of view it would be preferable for Westbourne Street to be open from the Pacific Highway to Herbert Street. However, that may not be possible as the private hospital, which objects to the reopening of Westbourne, have certain lease rights over part of the road. In the first instance there is intended to be a partial reopening of Westbourne Street but traffic flows between Herbert and Pacific Highway will not be permitted.

Traffic signals are not initially proposed but as the level of traffic builds up they may be required. In any event as pedestrian flow along Herbert Street increases they may be required to facilitate safe pedestrian movement.

The Concept Plan provides sufficient cross sectional detail to assess the conceptual design of the internal roads. Detail road designs to relevant standards and guidelines will be submitted at Project Application stage.

Off site linkages are under the control of Council and relevant land owners, and is beyond the control of the proponent. Excellent access is proposed through the site.

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No	Date	Submitter	Nature	
2	14.09.2006	North Sydney City Council	None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Excessive onsite parking provisions will result in unsuitable traffic generation and additional congestion on Pacific Highway. Limited capacity for increase of traffic on existing road network. Council supports 15% reduction in daytime car use by hospital staff. However, attempts to change traffic behaviour are likely to be unsuccessful. Parking constraint should be applied to all land uses. Council supports the creation of a legible and permeable pedestrian and cycle network. Council recommends that a network strategy be prepared that addresses: <ul style="list-style-type: none"> Pedestrian and cyclist safety at all times, particularly through isolated areas; The phased upgrade of existing routes to enhances use; and Effective way finding and interpretive signage. Greater provision for community facilities required. 				<p>Project Applications for individual developments will be subject to Willoughby Council's DCP parking rates and the final TMAP.</p> <p>Traffic report demonstrates that existing roads have capacity, particularly noting the decreasing volumes predicted after the new Gore Hill Freeway ramps are completed.</p> <p>TMAP to be implemented. Difficulties changing modal split are recognised, but an important objective nevertheless.</p> <p>Parking will be subject to Willoughby Council's DCP parking rates and the final TMAP</p> <p>Noted and proposed</p> <p>Noted and will be incorporated in final TMAP and station signage package (see Statement of Commitments).</p> <p>Community facilities have been increased from 100m² to 250m².</p>

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- Future retail uses on the site should be ancillary to hospital and commercial activities.
- Council is concerned about building heights and impacts from overshadowing.

Concerned about visual impacts from proposed heights.

Retail has been limited to that required to serve the planned population of the site and the immediate environs. No destination retailing is proposed, other than showrooms to activate ground level at Herbert Street.

All existing and proposed open spaces (except the Precinct 5 park and the open space link behind 207 Pacific Highway) and surrounding residents maintain solar access in accordance with Council' controls.

Additional visual analysis in amended Concept Plan demonstrates that heights sit comfortably within the established built context.

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No	Date	Submitter	Nature	
3	5.09.2006	Lane Cove Council	Support (in principle)	
Issue Raised				Proponent's Response
<ul style="list-style-type: none"> 1000 residents and up to 4000 jobs is a substantial intensification of the site. Recreational facilities not discussed in detail or given same consideration as open space. No plan for recreational facilities. Options for recreation to be explored further. Gore Hill Oval well utilised. Council's draft access DCP recommends 20% adaptable housing. Under the Children's Services Regulation 2004 (Children and Young Persons Act 1998) Clause 58 identifies only 90 children per crèche. Better to have 2 child care centres with a total of 100 children. A third of these places should be for 0-2 and 3-5 year olds. The 100m² community facility is inadequate considering the size of the development. Require solutions to impacts on surrounding area from additional dwellings. Building form should step back to respect visual context of Gore Hill Oval. Herbert Street set back (of 12 metres) supported by that 				<p>The provision for approximately 1000 residents and up to 4000 jobs directly accords with the Metro Strategy.</p> <p>Developer agreement, currently being negotiated with Willoughby City Council, will address opportunities for recreational and other facilities</p> <p>Lane Cove Council's DCP is not applicable to the site. Adaptable housing has been increased from 10 to 15%</p> <p>Noted. The number of childcare places has been increased from 100 to 180 and it is envisaged this will be distributed over several centres.</p> <p>Proposed community facility now increased from 100m² to 250m².</p> <p>Planning agreement being negotiated</p> <p>Buildings step back from Gore Hill oval in accordance with a sun access planes to the oval.</p> <p>12m 'boulevard' set back is inappropriate for an area trying to knit itself into the urban</p>

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building is strongly recommended for entire eastern side.

- No commitment to increase public transport. No agreement to increase services or upgrade facilities.
- Parking is undersupplied. This is supported only if more public transport provision is included.
- Council recommends developing a bus interchange on Lane Cove side of Pacific Highway.
- Consideration of increase GFA on southern side of Pacific Highway and associated traffic impacts.
- No recommendation on how cyclist can connect to the site from existing bike routes.
- Council recommends a Construction Traffic Management Plan.
- Council would like a clear indication of how section 94 contributions will be distributed.

framework of St Leonards CBD. Street wall to Herbert Street is well defined by the sun plane height control, new street openings and Precinct 7 open space

However, an additional 4m articulation zone is now proposed for the Herbert Street frontage of Precinct 4 and the Precinct 7 setback is been increased to 8m.

Public transport improvements supported, but beyond the control of the proponent.

Planning agreement currently being negotiated.

Parking will accord with relevant Council DCP requirements.

Noted, but beyond the power of the proponent.

Traffic generated on southern side of Pacific Highway will have little bearing on the northern side, and will be largely absorbed by positive effects of new ramps on Gore Hill Freeway.

Off site cycle routes are the responsibility of the owners of relevant roads, reserves and private properties. Extensive routes are proposed through the site that the proponent controls.

Construction Traffic Management Plans will be provided at Project Application stage.

Planning agreement still being negotiated.

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No	Date	Submitter	Nature	
4	5.09.06	Ministry of Transport	Object	
Issue Raised				Proponent's Response
<ul style="list-style-type: none"> Does not sufficiently support Metro Strategy. No reference to the status of roads as Strategic Bus corridors. Car parking target should be stated in the main document. Not considered adequate that 15% less hospital parking and that there is no increase in public or private hospital parking. Peak hour count required and impacts on buses, with details of all mode splits. Table 3.3 App 7 does not show peak hour split. Peak staff travel needs to be documented. (Australian Bureau of Statistic Journey to Work (ABS JTW) mode share target should be in main document. ABS JTW mode shift target should be accompanied by specific and time-based actions for attainment. Public transport enhancements should be in the main document and reference to Integrated Network Plans. 				<p>The Concept Plan is directly predicated on the Metropolitan Strategy, and will facilitate a modal shift towards public transport.</p> <p>The majority of the new roads are to be bus accessible, as agreed with MoT and STA in February 2006. However, none of them are intended to become 'Strategic Bus Corridors' similar to say the Pacific Highway..</p> <p>15% hospital parking reduction is stated as the target of the preliminary TMAP</p> <p>The TMAP will address all traffic management issues listed raised.</p> <p>Finalisation of the TMAP will involve the hospital and private developers working together with STA to implement measures to encourage staff, visitors and residents to utilise public transport as the mode of choice.</p> <p>See also the response to RTA's submission below.</p>

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- Existing and future pedestrian desire to cross the Pacific Hwy needs to be identified.
- A grid shaped system of new roads is supported.
- A bus service terminating in a loop is not supported.
- Main pedestrian access to main hospital (in Eileen Street) will create a conflict with the proposed bus route.
- A main cycle route on Red Rd will create conflict with the proposed bus route.
- Developer is expected to contribute towards the provision of additional services.
- Road layout does not provide the access requested under the DG's requirements.
- Insights required on where hospital staff members live to provide travel desire lines. Information to feed into INP.
- No clear set of impacts and issues to be addressed, with a potential package of infrastructure, services and design measures, appropriately costed.

It is thought that the requirement for pedestrians to cross Pacific Highway will lessen as medical users currently located south of Pacific Highway move to the new space developed on the hospital campus and a greater number of buses service the hospital campus.

It is desirable that the buses service the 'front door' of the hospital. Some conflict is therefore inevitable. However, this will be minimised by the pedestrian route from the station to the hospital having a tunnel under Eileen Street which will lessen the amount of pedestrian traffic across Eileen Street.

The roads requested to be designed to be bus accessible by Sydney Buses have been designed as such.

Agreed, and this should happen as the hospital T Plan is developed.

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No	Date	Submitter	Nature	
5	14.09.2006	Roads and Traffic Authority (RTA)	None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Significant queuing and congestion on the section of Pacific Hwy, Herbert St. and Reserve Rd. closed to the development of the site. 				<p>The MWT analysis indicates that peak period operating conditions would still be consistent with those generally occurring on major arterial routes in Sydney. That traffic volumes on Pacific Highway, a major arterial road, would increase is an inevitable consequence of the nomination of St Leonards as a major employment growth centre in the metropolitan strategy. However, in broader terms, the transit oriented nature of the project will reduce net demand per capita upon the regional road network.</p>
<ul style="list-style-type: none"> Traffic concerns in regards to queuing and congestion require a sensitivity analysis on an achievable modal split and car parking provision in consultation with RTA. 				<p>This is not considered necessary as the mode split adopted for the office space use of 22.5% car driver is implicit in the proposed parking provision. If the amount of parking provided is heavily restricted then of necessity only a similarly restricted number of employees would be able to drive. If this was not the case then there would be little point in limiting parking on the site.</p>
<ul style="list-style-type: none"> If modal split of 22.5% (car use for office employment) is achieved then an additional 50m long left turn lane is required within Herbert Street and an additional approach lane within reserve Road at Berry St. is required. 				<p>The MWT traffic analysis indicates that a second left turn lane would add little benefit as the left turn movement out of Herbert Street is not the critical movement. There is enough left turn capacity to accommodate extra movements from the hospital site already. The possibility of providing a second left turn lane was previously explored in conjunction with the St Leonards Forum development over the</p>

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- If 22.5% modal split not achieved then the developer would be required to fully fund and construct the additional road network/intersection and public transport improvements (Planning Agreement).
- Westbourne Street should be opened.
- If Westbourne St. not opened then required to install traffic signals at Pacific Hwy and Dickson Ave intersection. (Conceptual traffic signal plan required if this goes ahead).

railway station and was found to be inordinately expensive due to the presence of a major Telstra service in the way. In view of the considerable cost of relocating or modifying this service, this work is not justified and should not be a requirement of any approval.

A planning agreement in relation to off site traffic improvements is currently being negotiated.

Agreed that this is desirable but contrary to wishes of Willoughby Council and Private Hospital which has some lease rights. A partial opening is intended in the first instance.

These traffic signals are suggested as being necessary if Westbourne Street was not opened to all traffic between Herbert Street and Pacific Highway.

This requirement comes somewhat out of the blue as we have provided analysis to the RTA regarding the possible transfer of hospital site traffic from Westbourne Street/Dickson Street to Campbell Street if Westbourne Street was not opened. This indicates that Campbell Street would have the capacity to accommodate that traffic. The intersection of Campbell Street with Pacific Highway is already signalised.

If Dickson Street was to receive this traffic instead then it may be that new traffic signals at its intersection with Pacific highway would provide a service to the Artarmon area generally and to traffic flow along Pacific Highway rather than just cater for hospital traffic. In such circumstances a cost sharing arrangement would be appropriate.

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- If traffic signals installed at Herbert and Westbourne St. then a concept design must be submitted to RTA for 'in principle' approval.
- Minimise traffic conflict by restricting left-in/left-out from Herbert St/Yellow Rd. and Herbert St/Eileen St.
- Timing of roads works to be discussed and agreed with RTA.
- TMAP to be reviewed 1 year after the opening of the Chatswood to Epping rail Line. If no impact on reduction of car usage then additional strategies will be required at cost to developer.
- Full time no stopping restrictions to be implemented on western boundary of site.
- Maximise public transport use by reviewing car parking provisions with retail development as part of DAs.
- Pedestrian – Cyclist strategy require.
- Developer to sign planning agreement to increase services to site ensuring increase of public transport patronage.

Noted

Agreed and documented in Fig 45 and MWT's traffic report (Appendix 7 of draft Concept Plan)

Noted

The TMAP will involve an ongoing process of optimising modal split and transport accessibility. However, the suggested timing of 2009 may occur while there is significant construction on the site and this would make travel surveys difficult. Also, given the proposed overall growth in employment and dwellings in St Leonards it may be a better use of resources to first prepare an overall transport strategy for St Leonards and then to prepare sub plans for individual precincts. Otherwise it would be very awkward to coordinate a series of bottom up developed plans in a coherent way.

MWT agree with this submission. Further discussions will be held with the Willoughby Local Traffic Committee considering whether the section of road nearest to Eileen Street should have "no parking" rather than "no stopping". This can be addressed during finalisation of the TMAP and at Project Application stage.

Noted – Project Application stage.

Pedestrian/cycle strategies will be detailed in the final TMAP.

Levels of public transport service are beyond the control of the proponent.

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<ul style="list-style-type: none"> Ministry of Transport and STA to commit to future provision of bus service to site, including bus service through site and bus shelters. 	This is a matter for the Ministry of Transport and the STA.
<ul style="list-style-type: none"> Work Plan Travel Plan for precinct 3-8. 	This will be incorporated in the final TMAP.
<ul style="list-style-type: none"> Layout of car parking should be in accordance with AS2890.1 and AS2890.2. 	Noted
<ul style="list-style-type: none"> Detailed traffic signal design plan required at proposed intersections and forwarded to RTA. Plan checking fee and performance bond is to be paid. 	Noted
<ul style="list-style-type: none"> Works Authorisation Deed needs to be entered into with RTA. Need to be executed prior to assessment of traffic signal design plan. 	Noted
<ul style="list-style-type: none"> 10 year operational/maintenance charge required for new traffic signals. 	Noted

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No	Date	Submitter	Nature	
6	1.09.2006	Sydney Water	None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> A detailed potable water servicing strategy should be prepared. Section 73 Compliance Certificate required. Detailed analysis of impact on NSOOS using National Sewer Code method. Encourage investigation and implementation of water reuse and recycling schemes. 				<p>To be detailed at Project Application Stage</p> <p>Noted</p> <p>To be detailed at Project Application Stage</p> <p>Agreed. To be detailed at Project Application Stage</p>

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No	Date	Submitter	Nature	
7	23.08.06	State Transit Authority (Sydney Buses)	None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> • New bus stop along Reserve road should be done to the satisfaction of the STA. • Design should consider Disability Standards for Accessible Public Transport 2002. • New bus stop should cater for new articulated buses. • Road geometry of planned roads should cater for bus turning movements for future bus services (Herbert Street, Westbourne Street and Pacific Hwy). • Consultation about new services and diversions should be carried out with STA, Ministry of Transport and local authorities. • Development will result in increase delays along Pacific Highway which will impact on buses. 				<p>Noted. To be detailed at Project Application Stage</p> <p>Noted. To be detailed at Project Application Stage</p> <p>Noted. To be detailed at Project Application Stage</p> <p>Noted. To be detailed at Project Application Stage</p> <p>This will be undertaken as part of the TMAP finalisation process.</p> <p>With the opening of the Lane Cove tunnel and new access ramps to the Gore Hill Freeway, the MWT report demonstrates that volumes on the Pacific Highway will actually decrease, notwithstanding the additional volumes generated by development on the site.</p>

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No	Date	Submitter	Nature	
8	8.09.2006	RailCorp	Objected	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Concerned about road modification and bridge construction near the north shore line and the Government's ability to progress the proposed CBD Rail Link. Lands in and adjoining the rail corridor required by the project must be preserved. More information requested regarding proposed road link crossing the rail corridor leading east of Blue Street. The development may encroach in rail corridor. Pedestrian link to St. Leonard's station must be to RailCorp standard and must comply with the Commonwealth Disability Discrimination Act 1992. RailCorp request information on access restrictions, mode share arrangements, caps on car parking. No discussion on constraints to commercial, residential development. 				<p>To the proponent's knowledge, neither North Sydney, nor Willoughby Council is pressing the construction of the Chandos Street bridge. The Concept Plan redevelopment no longer relies upon this route for vehicular access purpose</p> <p>No part of the site is in or adjoining the rail corridor</p> <p>To the proponent's knowledge, neither North Sydney, nor Willoughby Council is pressing the construction of the Chandos Street bridge. The Concept Plan redevelopment no longer relies upon this route for vehicular access purpose</p> <p>The pedestrian bridge realignment will be undertaken in accordance with all relevant standards, which will be documented at Project Application stage.</p> <p>These will be incorporated in finalisation of the TMAP, which will involve consultation with Railcorp. Car parking arrangements are clearly set out in the draft Concept Plan and are in accordance with Willoughby Council requirements.</p>

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No	Date	Submitter	Nature	
9	31.08.2006	Heritage Council	None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> The site is a potential State Heritage item. Heritage Council supports retention of heritage precinct. Heritage Council supports adaptive re-use of buildings. Final decision on use should be made following preparation of Conservation Management Plan (CMP). Further efforts should be made to retain Chimney, Boiler House, Vindin House and Day Surgery during detailed design stage. Demolition should be a last resort. New buildings to be designed with careful consideration of character of heritage items and protect vistas. Supports preparation of DCP to ensure appropriate controls are put in place. 				<p>Agreed. Proponent has committed to formally nominate Precinct 3 for listing on SHR.</p> <p>Noted. Proponent has committed to formally nominate Precinct 3 for listing on SHR.</p> <p>Agreed. Final uses will be specified in project Applications following completion of a CMP.</p> <p>In view of the number of buildings being retained and the growth target objectives of the Metro Strategy, demolition of these elements is proposed. The physical requirements of the main hospital buildings make the retention of many of these impossible.</p> <p>A new Commitment is include in the Statement of Commitments requiring project applications to be accompanied by a design statement addressing these matters.</p> <p>The Concept Plan will serve the purpose of a DCP in this instance. A DCP is not the proper approach under Part 3A of the Act.</p>

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- A more detailed landscape plan should be prepared to identify other important features. Supports preparation of Interpretation Strategy and CMP. Include in SoCs.

Detailed Landscape plans will be provided at Projection Application stage, in addition to Heritage Impact Statements where relevant.

- Archaeological assessments are recommended.

All excavation will be undertaken in accordance with the archaeological report (prepared by Godden Mackey Logan) and the proposed Conservation Management Plan where relevant.

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3 Private Submissions

No	Date	Submitter	Nature Object	
10	1.09.2006	Space 207 Pacific Highway		
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Lack of due process by the Minister in notifying the application to owners of 207 Pacific Highway. Crude urban design analysis to determine built form. Adoption of development controls for protection of sunlight access to adjacent properties and open space. Significant overshadowing of open space. Concept Plan offers very little regard to heritage context of the site. Project should be open to public debate and requires extensive consultation with affected landowners. Consultation was inadequate and Space 207 Pacific Hwy should have been consulted during the preparation of the Concept Plan. Immediate context has not been fully considered including 				<p>The Concept Plan has been notified in accordance with Part 3A Section 75H Environmental Planning and Assessment Act 1979.</p> <p>This comment is unjustified and unsubstantiated. The proponent rejects this submission.</p> <p>This concern is overstated and it would be unreasonable to apply solar access controls to this urban link space, given the extensive solar access controls to all other active open spaces. It is preferable to provide excellent solar access to the new plaza, than to the pedestrian link behind.</p> <p>See above comment</p> <p>Extensive heritage assessment is included in Concept Plan and extensive efforts have been made to preserve the majority of significant elements.</p> <p>Extensive consultation is ongoing</p> <p>Space 207 is being consulted through the proper Part 3A processes.</p> <p>All of these matters are examined in the Concept Plan.</p>

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orientation of street blocks, the siting of buildings and the height and scale of the buildings.

- Derivation of building envelopes from solar access analysis
- Does not provide a rational urban design response to accommodating increased intensity.
- Must provide a transition in scale, form and height.
- Development density should be along Herbert Street.
- Maintain amenity to key open space.
- Very little consideration of options of built form.
- Height and scale of development should step down from 207 Pacific Highway.
- Density greatly exceeds 3:1 FSR of 207 Pacific Hwy.
- Willoughby DCP has not been addressed.

The methodology employed to derive the height of building envelopes is identical to that used to derive the envelopes in the Sydney CBD.

This statement is unsubstantiated opinion. A clear rationale for the distribution, and the assessment of potential impacts of the propose density is detailed in the Concept Plan.

The fundamental rationale of the proposed height regime is predicated on comfortable transitions between surrounding open spaces and buildings.

Development density is concentrated along Herbert Street.

A new sunny, active plaza is proposed just north of the east west 207 Pacific Highway link, with a new pedestrian north south link as an extension of the north south link through 207 Pacific Highway. This plaza will be a direct benefit and provide significant amenity for workers from 207 Pacific Highway.

18 massing options are examined at Section 6 of the Concept Plan.

This submission is unjustified and contrary to the development objectives of the metro Strategy and St Leonards Strategy, and the urban context of the St Leonards Town Centre.

The gross density of FSR 3:1 permitted on 207 Pacific Highway compares favorably with the gross density of FSR 3:1 proposed across Precincts 3 – 7 at RNSH. It is quite unreasonable to compare net densities on the site with the gross densities at 207 Pacific Highway. When described in comparable terms, the density of the proposed mixed use zone is the same as that at 207 pacific Highway.

The Minister is not required under Part 3A of the Act to consider a DCP, and in any event the Willoughby DCP contains few provisions of material significance to the site, with the exception of car parking rates, which are adopted in the Concept Plan, and exempt and

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- Overshadowing will have a negative impact on 207 Pacific Hwy where 90% of the open space (at 207) will be in shadow in mid-winter.
- Set backs should be consistent along Herbert Street

complying provisions, which are adopted under the Draft SSS listing.

As discussed, 207 Pacific Highway is a commercial building in a CBD context and it would be unreasonable to apply open space solar access standards to what is effectively a linear connection. It is preferable to provide excellent solar access to the new plaza, than to the pedestrian link behind.

The requested setback of 15m to the southern boundary of the RNSH site is an unreasonable request. The proposed building separation between RNSH and 207 Pacific Highway compares favourably with the separation between the two buildings on the 207 Pacific Highway site itself.

Along Herbert Street the proposed setback varies from 4 to 8 metres, with numerous substantial gaps created by new roads and a park that will provide significant articulation of this street edge.

Royal North Shore Hospital, St Leonards

No	Date	Submitter	Nature	
11	5.09.2006	Broadcast Australia	Object	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Proximity of communications tower to height of development. This can impact on services. Request that the listing impose a more reasonable height limit and measures to ameliorate electromagnetic interference from proposed land uses. Impacts on microwave links used by ABC and SBS. Failure to recognise EMR issues. 				<p>Discussions have taken place with Broadcast Australia and the consultant THL. It is generally agreed that the only concern is EMI (being electro magnetic interference from the towers) the other concerns not being relevant. Discussions are ongoing and a form of words governing the design of any building facades facing the tower is being drawn up.</p> <p>Height limits have been reduced from those exhibited.</p>

Royal North Shore Hospital, St Leonards

No	Date	Submitter	Nature	
12	29.08.2006	Gore Hill Memorial Cemetery Trust	None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Encouragement of through traffic on the site will compromise pedestrian safety and amenity of the public domain. 				Increasing pedestrian and vehicular permeation through the site has been a key objection of the principal stakeholder and is proposed as a material public benefit.
<ul style="list-style-type: none"> There is an absence of landscaping in the proposal to improve the interface between the proposed development and the cemetery. 				A landscape Concept Plan has been submitted and a fully detailed landscape plan will accompany the Project Application.
<ul style="list-style-type: none"> Opening Westbourne Road would have negative impact on the cemetery as a passive recreational space. Westbourne Street will become a through road for rat running and should continue to be limited to emergency and service vehicles. Westbourne Street should be bus only access. 				Please refer to response to Willoughby Council's and RTA's submission for issues related to traffic.

Royal North Shore Hospital, St Leonards

No 13	Date 29.09.2006	Submitter Individual (Nurse at RNSH)	Nature None stated	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Many patients don't drive because they are chronically ill and require better social supports. They rely on public transport and then walk which can be arduous. Recommend a small hospital bus service to link the needs of out patients and day only services. More RTA (STA) buses would also be a bonus. Complimentary services and extended hours pharmacy services would be essential in Reserve Road/Herbert Street location. 				<p>The project will significantly improve the accessibility, grades, amenity and activity and safety of routes between public transport and the hospital building.</p> <p>All of these initiatives are supported in principal. Such matters will be developed into the final TMAP. A small bus from the station to the hospital will be examined, and such a service is likely to be required at least during the initial hospital construction period and perhaps until the bridge link with the station is completed.</p> <p>The Concept Plan is designed to promote additional buses to service the hospital campus. However, the final scheduling of buses is beyond the control of the proponent.</p> <p>The Concept Plan has designed retail and other services for the workers, patients and residents of the area.</p>

Royal North Shore Hospital, St Leonards

No 14	Date 28.08.2006	Submitter Local resident	Nature Object	
<u>Issue Raised</u>				<u>Proponent's Response</u>
<ul style="list-style-type: none"> Buildings of 20m are too tall and will create overshadowing and reduce visual amenity. 				<p>As detailed at Sections 8.6 and 8.7 of the Concept Plan the proposed heights have been determined to avoid shadows in excess of normal urban standards, and to sit harmoniously within the St Leonards townscape. There will be buildings over 20m (6 floors) though any overshadowing impacts have been designed to be kept within reasonable limits and the townscape context of the St Leonards CBD, and in particular are not inconsistent with the heights of residential buildings on the opposite side of Herbert Street.</p> <p>This submitter did not give their address so it is difficult to comment specifically on the impact on their residence.</p>

appendices

Appendix A

Department of Planning Submissions Summary

appendices

Appendix B

Public Submissions