

Our Ref: 22331

28 July 2023

Cancer Care Associates  
c/o- Essence Project Management Pty Ltd  
Level 25, 123 Pitt Street  
Sydney NSW 2000

**Attention: Jeffrey Hunter**

Dear Jeffrey,

**RE:     CANCER CARE MANNING-GREAT LAKES  
          88 – 90 CORNWALL STREET, TAREE  
          RESPONSE TO COUNCIL'S REQUEST FOR FURTHER INFORMATION (RFI) - PARKING**

The following provides The Transport Planning Partnership (TPPP)'s responses to the parking matters raised in Midcoast Council's (Council's) request for further information related to the proposed cancer care clinic at Cornwall Street Taree.

### **Background**

A Development Application (DA) has been submitted to Midcoast Council (Council) for a proposed cancer care treatment clinic at 88-90 Cornwall Street, Taree (DA2022/1362).

Council has responded to the DA with a request for further information in its letter dated 2 March 2023. TPPP responds to the parking related comments as below.

It is noted that the proposed development has been amended in response to council's request for further information, and includes the provision of additional on-site parking space. The updated architectural plans are provided in Attachment One.

### **Council's Comments**

Council provided the following comments in relation to traffic and parking matters.

## 1. Insufficient Car Parking

The submitted Statement of Environmental Effects (SoEE) and Traffic Impact Assessment (TIA) provide that there will be a maximum of 11 staff and 7 patients on site at any one time. The proposed development provides:

- 6 car parking spaces; and
- 1 ambulance/patient drop-off-pick-up point.

Part G of the *Greater Taree Development Control Plan 2010* (DCP) provides the following car parking requirements for 'medical centres':

- 3 per surgery; plus
- 1 per doctor; plus
- 1 per employee
- or
- 4 spaces per 100m<sup>2</sup>  
(whichever is the greater)

Based on the above, the car parking requirements for the proposed development is 29 spaces (when rounded up). Therefore, the proposed development results in a significant shortfall of 23 car parking spaces.

The SoEE states that the DCP does not provide specific car parking requirements for a 'cancer care treatment facility'. The SoEE also states that the proposed development varies significantly from a normal 'medical centre' type facility in terms of the staffing and patient numbers as justification for the inapplicability of applying 'medical centre' car parking requirements. However, the SoEE fails to further expand on this.

The TIA states *'Based on the experience from other similar cancer treatment facilities, the average percentage of staff and patients drive and park on site is about 60%. This is equivalent to a parking demand of 11 cars'*. However, no evidence of other similar development sites including parking surveys etc, have been provided to validate this statement.

Whilst it is appreciated that the operations of the proposed development may differ from a traditional medical centre, and in this respect may not demand the same amount of car parking, the applicant has failed to clearly demonstrate these differences. Notwithstanding, it is not considered that a shortfall of 23 car parking spaces can be offset by the operations of the proposed development.

The applicant's claim that any shortfall in car parking can be offset through the provision of on-street car parking is not considered acceptable given the existing residential context of the street and the ability of on-street car parking to impact on the amenity of residences.

It should also be noted that the site is located on the periphery of Taree's medical precinct which experiences overflow car parking from the existing development within the precinct including the hospital. A site visit conducted on the 1 February 2023 revealed a number of cars parked along Cornwall Street near the frontage of the site.

This overflow car parking is only likely to increase in the future with the expansion of this precinct including the hospital. Therefore, cumulative impacts associated with additional on-street car parking from developments must be considered.

The reliance of on-street car parking to the degree proposed under this application also provides an undesirable precedent in the reliance of off-street car parking to satisfy car parking requirements.

The proposed development is to be re-designed to significantly increase the number of car parking spaces provided on-site. If car parking concessions are still sought by the applicant following this re-design, further information must be provided demonstrating how the proposed operations differ from a traditional medical centre. Further information must also be provided that validates the claim made that *'Based on the experience from other similar cancer treatment facilities, the average percentage of staff and patients drive and park on site is about 60%'*, for example car parking surveys.

## Response to Comments

### Travel Mode Surveys at Existing Cancer Care Clinics

Patients travel mode surveys have been undertaken at the existing Cancer Care Clinic at Griffith, as this existing clinic is considered to be the most relevant to the proposed Cancer Care at Taree based on the following reasons:

- both clinics are located in the regional areas and offer services to patients with similar demographic
- both clinics have similar services and operational intensity

The Cancer Care Griffith (CCG) offers both radiation and medical oncology consulting and treatment, with 1 x LINAC Treatment Bunker and 6 x Chemotherapy Chairs.

The results show that the average daily attendance at the clinic was 11 patients. The duration of stay for each treatment is:

- Radiation Oncology Treatment (using LINAC Treatment Bunker): 30 minutes
- Medical Oncology Treatment (using Chemotherapy Chairs): 2 hours

As the travel mode survey results presented in Table 1, about 94% of the patients drove to the site.

**Table 1: Surveyed Patient Travel Mode for Griffith Cancer Care Clinic**

	Mode of Travel				
	Car	Drop-off/Pick-up	Motorcycle	Walk	Public Transport
Patient	32	2	0	0	0
Patient (%)	94%	6%	0	0	0

The duration of stay of patients on site is determined largely by the length of the appointment (treatment) with additional time prior to and following the treatment included in the duration of stay. Duration of stay is considered to represent the effective parking demand for patients of the clinic.

As noted above, treatments are either 30 minutes or 2 hours in duration. Appointment times are staggered across the operating hours of the clinic such that patient arrivals and departure not all treatment chairs or bunkers change over patients at the same time.

The surveyed patient demand for the Griffith clinic indicated a typical peak demand of up to 5 patient movements per hour (2 patients on radiation treatment per hour and 3 patients on medical treatment per hour).

The survey results indicate that the maximum number of patient related vehicles parked on site at any one time is 4 cars.

## **Amended Development Car Parking Demand Profile**

The proposed development has been amended to reduce the scale of the services and provide more on-site car parking spaces:

- Maintain one bunker for LINAC radiation treatment
- Reduce the medical oncology chairs from 5 to 2
- Two oncology consultation rooms (non-treatment consultations for new or ongoing patients)
- Provide 10 car parking spaces (including 3 spaces in the front car park off Cornwall Street and 7 spaces in the rear car park off Cornwall Lane) and 1 ambulance bay / pick-up and drop-off zone in the front car park.

### Patient Number

TTPP has been advised that the clinic is expecting to accommodate up to 12 radiation oncology patients and 4 medical oncology or haematology patients per day. The proposed 1 bunker and 2 medical oncology chairs would service up to 3 patients on site at any one time (1 on radiation treatment and 2 on medical treatment).

Based on the existing operation of Cancer Care Griffith, patients will attend the clinic by appointment only and there will be about 4 medical oncology patients per day. Therefore, the maximum number of patients expected on site for medical treatment is 2 patients at any one time with two medical oncology chairs. Patients waiting at the clinic prior to the appointment are not expected.

As the radiation treatment would serve 1 patient at a time with an average duration of 30 minutes, it is expected to have a maximum of 2 patients on site at any one time for radiation treatment (1 patient undertaking the treatment and 1 patient waiting at the clinic prior the appointment).

The proposed development is provided with two consultation rooms, one for the radiation oncologist and one for the medical oncologist. As each oncologist will visit the site one day per week separately, it is expected that there will be two days of consultation available per week and only one room open at a time. TTPP has been advised that there will be no overlap of patients for the oncology consultations due to the pattern and timing of the patient appointment and the requirement for oncologist preparation time. The flow description for the consultation is shown in the following:

- New patient appointment (40 minutes) – clinical assessment of patient within the consultation room including examination, patient history, treatment consent, side effects discussion and any other relevant information.
- Oncologist preparation (20 minutes) – assessment of patient diagnostic scans and information and research into best care pathway / treatment. No presentation required by the patient at this time.

With the above durations and schedule, it is expected that there will be 1 patient on site at any one time for consultation and up to 3 patients for each consultation day.

Based on the above, the maximum number of patients on site at any one time is 5 patients:

- 2 patients for medical treatment
- 2 patients for radiation treatment
- 1 patient for consultation

### Staff Number

The proposed clinic would expect up to 7 staff on site at any one time. The staffing profile of the clinic is shown in Table 2.

**Table 2: The Staffing Profile of the Cancer Care Taree**

Profession	Staff Number
Radiation Oncologist	0.2 FTE – 1 day per week
Medical Oncologist	0.2 FTE – 1 day per week
Administration	Two
Radiation Therapist	Two
Medical Physicist	0.2 FTE shared resource with NBCC
Nurse	Two
Total (Full-time Equivalent)	6.6 (rounded to 7)

### **Parking Assessment**

The Greater Taree DCP 2010 does not provide specific car parking requirements for Cancer Treatment Facilities, but it provides the following car parking requirement for 'medical centres':

- 3 spaces per surgery; plus
- 1 space per doctor; plus
- 1 per employee
- Or 4 spaces per 100m<sup>2</sup> (whichever is the greater)

Based on the latest architectural plans, the usable GFA of the clinic is about 400 m<sup>2</sup> (excluding storage, bathrooms, corridor and level 1 staff resting areas).

The car parking requirement for the proposed development is 16 spaces using the parking rates for medical centres.

However, the proposed clinic is only expecting a maximum of 12 persons (patients and staff) on site at any one time. The proposed cancer treatment facilities will not operate in the same way as a traditional medical centre and will not have the same number or turnover of patients in the facility at the same time as medical centres or health consulting rooms.

The car parking demand of the proposed development is assessed based on the first principal analysis with data sourced from the travel mode survey from the existing Cancer Care Griffith and Australia's Journey to Work published by The Australian Bureau of Statistics (ABS).

#### Parking for Patients

The survey results from Cancer Care Griffith shows that about 94% of the patients drive to the site. As the proposed cancer treatment clinic is expecting to have a maximum of 5 patients on site at any one time, the parking demand of patients would be **5** car spaces (rounded up). However it is considered acceptable to allocate one car space as a pick-up/drop-off bay as a small portion of patients would be dropped off and picked up instead of parking the car on-site for the whole treatment session.

#### Parking for Staff

According to the ABS 2021 Census data, the percentage of employed people who travel to their workplace at Taree by car (as driver) is 89%<sup>1</sup>. The proposed development is expected to have up to 7 (rounded from 6.6) staff on site at any one time. As such it would require **6** car parking spaces for staff.

#### Parking Provision

Based on the above assessment, the proposed development would require a total of **11** car parking spaces to be provided on site.

The amended architectural drawings show that there will be 6 staff car parking spaces, 4 patient car parking spaces and one pick-up/drop-off bay provided on site for the development. The pick-up/drop-off bay can be used by patients who are dropped-off/picked-up by their carer/taxi/DVA transport service and do not require the companion to wait on site with them for a long duration of treatment/consultation.

Therefore, the provision of 10 car parking spaces plus one drop-off/pick-up bay will be able to accommodate the parking demand of the proposed development and is considered satisfactory.

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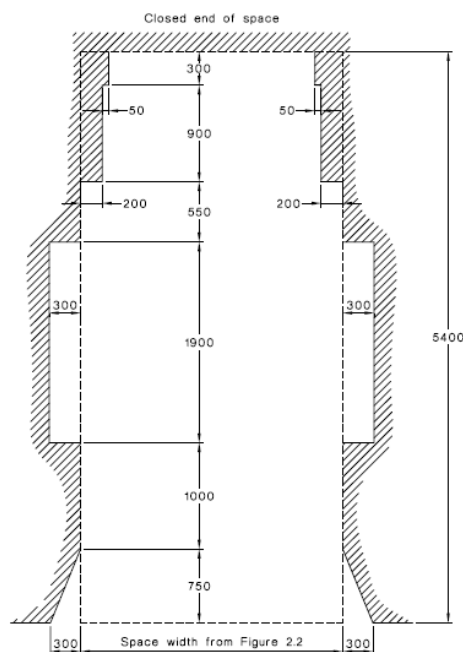
<sup>1</sup> Source: Australian Bureau of Statistics, 2021 Census. <https://maps.abs.gov.au/index.html>

## Car Park Layout

Car parking spaces allocated to the employees are to be designed in accordance with the Australian Standard AS2890.1:2004 User Class 1A, and car parking spaces allocated to the patients are to be designed in accordance with Australian Standard AS2890.1:2004 User Class 3, or designed as accessible space in accordance with AS2890.6. User Class 1A spaces are a minimum of 2.4m wide, 5.4m long with a 5.8m aisle width. User Class 3 spaces are a minimum of 2.6m wide, 5.4m long with a 5.8m aisle width. Accessible spaces are a minimum of 2.4m wide, 5.4m long with an adjacent shared space of the same dimensions. A 300mm clearance is to be provided on either side of a car parking envelope as per Figure 5.2 of AS2890.1:2004.

AS/NZS 2890.1:2004

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NOTE: The design envelope provides for structural elements to be clear of all four side doors.

DIMENSIONS IN MILLIMETRES

FIGURE 5.2 DESIGN ENVELOPE AROUND PARKED VEHICLE TO BE KEPT CLEAR OF COLUMNS, WALLS AND OBSTRUCTIONS

6 car spaces are designed in accordance with User Class 1A for staff parking. 2 car spaces are designed in accordance with User Class 3 for patient parking. 2 spaces at the front car park are designed as accessible spaces in accordance with AS2890.6 for patient parking. An ambulance bay & pick-up/drop-off bay, which allows for a temporary stop only, is located in front of the accessible parking spaces.

The proposed car park layout is compliance.

The latest architectural plans are provided in Attachment One.

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Paul Cai'.

**Paul Cai**  
**Senior Traffic Engineer**

Attachment One – Architectural Plans



# Attachment One

## Architectural Plans



