



23 November 2022

Mr Patrick Nash
Via the Planning Portal

Your Ref: SSD-45373580

Dear Mr Nash

**Proposed New Rouse Hill Hospital Concept and Stage 1 Early Works
Lots 311 and 312 DP 1274392, Commercial Road, Rouse Hill**

In regard to the proposed new Rouse Hill hospital concept and Stage 1 early works, the following comments are provided for your consideration as part of the assessment of the DA. I note that some of the comments below are the same as matters raised in previous correspondence relating to the SEARs dated 04 July 2022.

1. Site Planning

- a. Whilst it is acknowledged that the proposal is for a Concept DA, further information is required regarding the design and key components of the hospital, including specific details of floor area of the hospital and separate supporting services/uses, setbacks, height, built form, building envelopes, parking provision etc. Based on the information provided, detailed comments cannot be provided for consideration.
- b. Consideration of visual impacts from the multi-storey carpark given its location at a prominent corner.
- c. Consideration to be given to providing a pedestrian entry point to the southern end of the hospital building to reduce external walk time.
- d. Provide details regarding the pedestrian connectivity from public transport (bus stops and Metro station), the adjacent Town Centre and identify opportunities for pedestrian connections to the remainder of the Northern Frame site.

2. Rouse Hill Draft Precinct Plan

At its meeting on 22nd November 2022 the Hills Shire Council considered a draft Precinct Plan for the Rouse Hill Strategic Centre and resolved to proceed to community consultation and public exhibition, which will commence early next year. The draft Precinct Plan identifies a new direction for Rouse Hill, based on the strategic planning framework and investigations undertaken over the past 3 years. The draft Precinct Plan acknowledges the new Rouse Hill Hospital site and seeks to

capitalise on the government investment in the locality (in both the future Rouse Hill Hospital and the Sydney Metro Northwest) by facilitating increased development opportunities in the locality.

The draft Precinct Plan has sought to consider the future Rouse Hill Hospital, based on the information available at the time of drafting the plan, and ensure that the development outcomes planned in the locality will facilitate and enhance the operation of the hospital and supporting health industry related development. Health Infrastructure NSW will be a key stakeholder in the consultation to be undertaken by Council in early 2023 and it would be beneficial to both Council and Government to share information and continue to collaborate.

The draft Precinct Plan identifies a pedestrian bridge over Commercial Road, connecting directly to the hospital site. The hospital site should be designed to incorporate the landing area for a pedestrian bridge to be located within the site.

3. Infrastructure and Contributions

The applicable contributions plan is the Hills Shire Wide Section 7.12 Contributions Plan (the EIS incorrectly refers to Contributions Plan No.8, which is for residential development). The Hospital will generate demand for infrastructure in terms of traffic and transport management (in terms of traffic works to roads and pathways beyond the hospital site that are required for vehicles and pedestrians to access the hospital) and drainage and stormwater management (the EIS notes that the site will discharge into the existing drainage infrastructure in Commercial Road). The future Rouse Hill hospital site is a greenfield site in a growth area and as such apportioned contributions toward new and upgraded infrastructure are necessary to deliver infrastructure to support the precinct.

The draft Rouse Hill Precinct Plan identifies future upgrades to the regional road network to support the growth proposed in Rouse Hill, including the hospital. The EIS has not contemplated any impacts the hospital may have or any contributions toward the regional road network upgrades. In addition, the development of the future Rouse Hill Hospital necessitates additional upgrades to Commercial Road beyond what was originally envisaged to service the development in the locality. Specifically, additional turning lanes at the intersection of Caddies Boulevard/Commercial Road and alterations to the access to the Fiddler, which will require widening of Commercial Road, have been identified. Typically, if a development generates demand for additional infrastructure (such as additional land take for widening of intersections and construction of additional turning lanes) a contribution would be made toward these items or the developer would deliver the works in association with the development and it would not be left to other entities such as the Council or adjacent landowners to cover this cost.

While it is acknowledged that the Government is making an investment by delivering a hospital in the locality, Council staff are concerned that the cost to deliver the additional infrastructure required to support the hospital will fall to Council or other landowners in the broader Rouse Hill Precinct. Circular D6 (1995) and the Draft Development Contributions Practice Note dated 2005 refer to conditions of consent which may be appropriate to impose on Crown developments. Specific reference is made to Section 94 Contributions, now known as Section 7.11 and Section 7.12 Contributions. The Circular notes that for health services developments contributions toward drainage infrastructure, upgrading of local roads and in some instances arterial road upgrades are appropriate categories of contributions to potentially levy Crown developments providing an essential community service, such as health services. Council does not support an exemption from development contributions with the Concept SSDA, as the full extent of impact on infrastructure, and potential appropriate contributions, has not yet been determined. Consideration should be given to contributions (either monetary or works) towards the infrastructure necessary to support the hospital with the appropriate consents in the future.

It is also recommended that the Applicant provide a cost summary report for the Stage 1 works and a condition be imposed to levy contributions under the Hills Shire Wide Section 7.12 Contributions Plan.

4. Stormwater:

- a. Concentrating stormwater surface flows into adjoining site will not be permitted. The proposed Dispersion trench is not supported. Refer to Section 4.4 - Lawful Point of Discharge of Council's Design Guidelines Subdivisions/ Developments.
- b. The design of the stormwater including Water Sensitive Urban Design shall be consistent with the approved stormwater management strategy under Masterplan DA1604/2004/HB (as amended) and DA 354/2013/HB (as amended)
- c. The capacity of the stormwater system into which stormwater from the development discharges into, must be checked/analysed. Please note that the check/analysis shall be carried out to the legal point of discharge to ensure that the street pits will not be surcharged during minor events up to the 10 years ARI storm event and up to the 20 years ARI storm event for the sag pit.
- d. The Rainfall Intensities shall be consistent with the Section 4.10 Council's Design Guidelines Subdivisions/ Developments. Similarly, the duration of the analysis shall be extended to 72 hours.
- e. Any proposed work on Council's land/road due to the proposed development shall be prepared and provided in accordance with Council's Design Guidelines Subdivisions/ Developments and Works Specifications Subdivisions/Developments.
- f. The OSD, water quality and rainwater tanks shall be shown on the civil plans and relevant sections plans. OSD and rainwater tanks are permitted on common areas only. Rainwater tank and OSD underneath the hospital building will not be supported.
- g. Any proposed work on Council's land/road due to the proposed development shall be subject/ requires separate approval from Council beforehand via Section 138 of the Roads Act 1993.
- h. When OSD, Water Sensitive Urban Design elements and rainwater tanks are provided for the development, Positive Covenant/Restriction-as-to-use – legal protection are required to be placed on a property title requiring owners to repair and maintain the OSD systems.
- i. Catchment plan (including internal and external), pipe sizes, design and existing levels shall be shown on the plans.
- j. The Water Sensitive Urban Design elements must demonstrate a reduction in annual average pollution export loads from the development site in line with the following environmental targets:
 - 90% reduction in the annual average load of gross pollutants
 - 85% reduction in the annual average load of total suspended solids
 - 65% reduction in the annual average load of total phosphorous
 - 45% reduction in the annual average load of total nitrogen
 - All model parameters and data outputs are to be provided.
- k. Any proposed retaining wall shall be designed such that it accepts and caters for any surface runoff from the up slope adjoining land in a 'failsafe' manner without affecting any other property. No diversion or concentration of stormwater surface flows will be permitted. Any proposed retaining wall including footing and subsoil drain shall be design and constructed fully inside the property boundary
- l. Civil Engineering plans shall be prepared and provided as part of the submission. This shall include but not limited to full road's width, long section, cross-section, earthworks, extent of the cut/full, drainage, services...etc. Earthwork plan, cut & fill, and retaining wall shall be provided on a separate plan.
- m. The Integrated Water Management Plan prepared by ACOR Document reference No. ACR-CIV-RPT-001, Rev D, states "Groundwater seepage was only encountered in a few boreholes at depths ranging from 2.5m to 5.5m, with most boreholes dry on completion of drilling". Therefore, Geotechnical report will need to assess the Groundwater and shall report the extraction/removal volume from the development per year during construction phase and ongoing operation/post development. If the extraction/removal volume from the development per year

during construction phase and ongoing operation is found to be less than 3ML per year for the whole site then exemptions might be granted. Refer to the link below for further details: Groundwater WAL exemptions for 3ML and Botany Sands | NSW Dept of Natural Resources Access Regulator. If the extraction/removal volume from the development per year during construction phase and ongoing operation is found to be more than 3ML per year for the whole development, then either any basement will need to be tanked or amend the application and provide concurrence from NRAR regarding the basement design.

- n. Provide clarity regarding what is proposed with respect to stormwater design (i.e. Lawful Point). The EIS prepared by Urbis, dated 20 May 2022 states “stormwater from the southern catchment will be collected and discharged via a dispersion trench along the southern boundary, with provision to connect this to future precinct stormwater system” this is not supported. However, the stormwater management plan prepared by ACOR, drawing no. C008-001, issue P4 shows fill and change of internal catchment (i.e. cross catchment will not be supported) to avoid a stormwater easement, which is not supported.

5. Road layout and traffic issues:

- a. Traffic report prepared by suitably qualify traffic engineer shall be provided with the application.
- b. The design of the internal road and site access shall comply with Part D Section 6 Rouse Hill Regional Centre and the Precinct Plan DA 354/2013/HB (as amended)
- c. Minimum Sight Distance Requirements (MSDR) and Minimum Gap Sight Distance (MGSD) (including sight distance for pedestrian) shall comply with relevant AS/ NZS 2890.1, AS 2890.2 and AS/ NZS 2890.6 and Ausroad.
- d. Footpath and shared pathway shall be shown on the plans and shall be connected to an existing footpath and shared pathway
- e. The proposed road layout is inconsistent with the Part D Section 6 Rouse Hill Regional Centre and the Precinct Plan DA 354/2013/HB (as amended), which is not supported. The road layout, basin/OSD, earthwork on the soil erosion and sediment control plan (drawing No. C003-001, Issue P2) is inconsistent with bulk earthworks plan (drawing number C004-001, issue P3) and again with stormwater management plan (drawing no. C008-001, issue P4)
- f. Provide clarity regarding the note on the civil plans which states “note: only construct roads and bulk excavation are included in the early works kerbs, gutters, footpaths, final road build up and surface are not included in early works and are shown only for information” the future surface levels can only be vary by 100mm or less. The surface level will be fixed by this SSD approval hence Earthwork plan, cut & fill, and retaining wall (including ToW, BoW, long section) shall be provided on a separate plan any better shall be 1:4.

6. Road Upgrade Works

- a. Windsor Road intersection needs to be upgraded to provide three lanes in either direction. A new sub arterial standard fourth leg is shown on the western side of the intersection and the road hierarchy for this road is not consistent with the Tallawong Precinct Plan (see attached). The Tallawong Precinct plan shows this road as a local road with left in/left out access at Windsor Road. There is also an intersection with a proposed roundabout near Windsor Road.

- b. A 70 metre right turn bay is required on Commercial Road at the Main Hospital Road. To provide this and to also maintain the existing right turn bay into The Fiddler, the road will need to be widened by 3.5 metres on the hospital/Endeavour Energy side as shown on the attached concept sketch.
- c. Caddies Boulevard intersection requires a significant upgrade. This upgrade will require additional land acquisition as shown on the attached concept plan.

See plans below.

7. Traffic Generation and Modelling

- a. The traffic report states that the traffic generation of the proposed hospital is based on profiles derived from surveys of other similar hospitals and formulas developed for calculating the staff, patients, and visitors trip generations. However, no details of the surveys and calculation of the trip generation have been provided with the report.
- b. The intersection layout used for SIDRA modelling analysis for the year 2026 and 2036 (Figure 1) shows Windsor Road at the intersection with Commercial Road has three (3) through lanes in the north and south bound directions with an additional forth leg on the western side of the intersection.

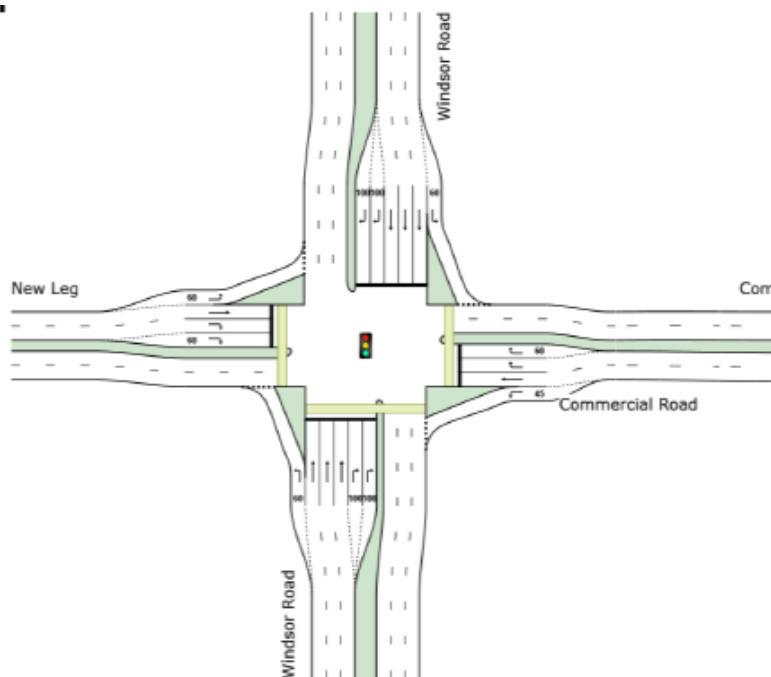


Figure 1. SIDRA Intersection Layout of Windsor Road and Commercial Road (source: Arup's traffic report)

- c. The intersection of Windsor Road and Commercial Road is currently a T-intersection with no western leg and only has two through lanes on the northern and southern legs. The traffic report states that this configuration is based on future intersection layouts previously discussed with TfNSW and The Hills Shire Council. Council's Traffic Team are not aware of this proposal and discussion.
- d. It should be noted that the addition of the western leg including the lane configuration is not in line with the current Cudgegong Road Station (Area 20) Precinct Plan as shown in Figure 2 and poses concerns with regard to the short distance between the traffic light and the roundabout.

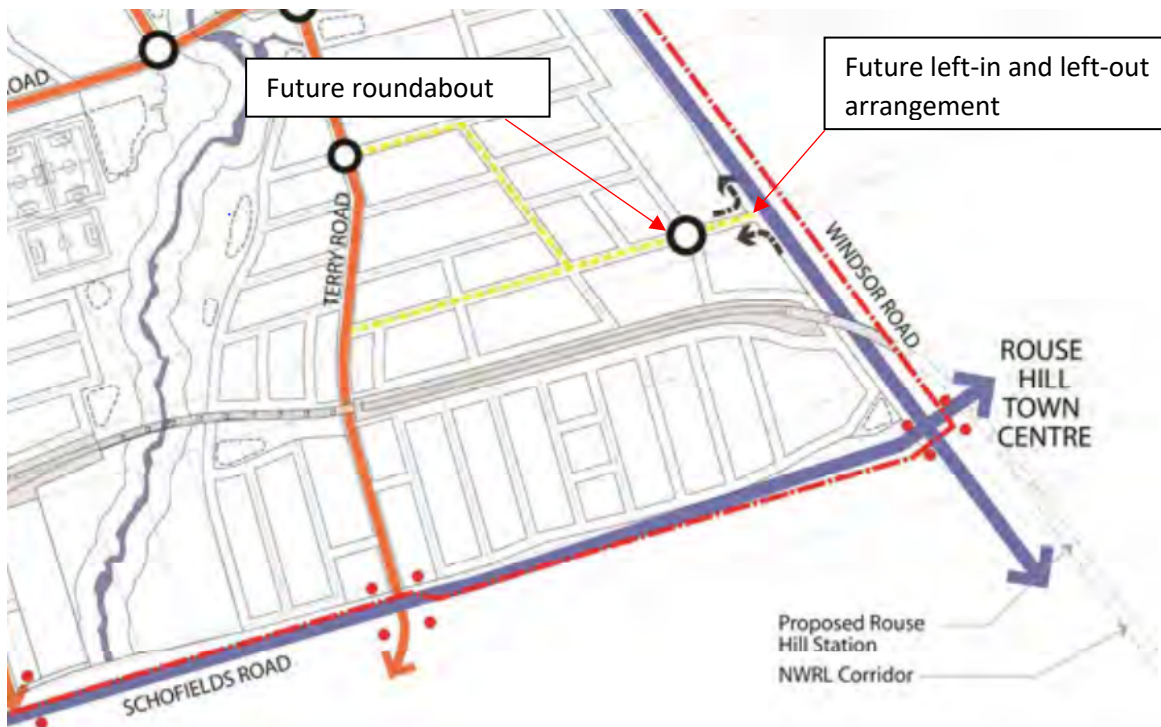


Figure 2. Cudgegong Road Station (Area 20) Precinct Road Hierarchy Plan (source: NSW Department of Planning and Environment [website](#))

- e. The number of beds and number of staff are not clearly stated in the report, however, In Section 3.6.3 there is a reference of 58 Beds. These needs to be clearly detailed in the report.
- f. Whether the proposal is a private or public hospital is required to be detailed.
- g. The RTA guidelines trip generation rates for private hospital is mentioned. This rate should be adopted if it is a private hospital, however in the report there are formulas mentioned for staff trip generation, patient traffic generation and visitor traffic generation but reference to these formulas are not mentioned and calculation/table should have been shown in the appendices of the report.

Examples of comparison with similar hospitals would also be beneficial.

- h. Section 3.5.1 refers to additional residential demand which was therefore added to the future traffic. The report is to be updated to show the traffic volume for both i.e. before and after the residential demand was added for Year 2026 and Year 2036. The report is also required to address the future traffic volume in a network layout as per Figures 3-6 and 3-7 shown in the report.
- i. As the new leg in Windsor Road and Commercial Road intersection needs to be updated, the Trip Distribution is also required to be reviewed. The report suggests 7% from the West via the new Area 20 development.
- j. All modelling software files are required to be submitted with the updated report.
- 8. Right Turn Bay to the Main Hospital Road

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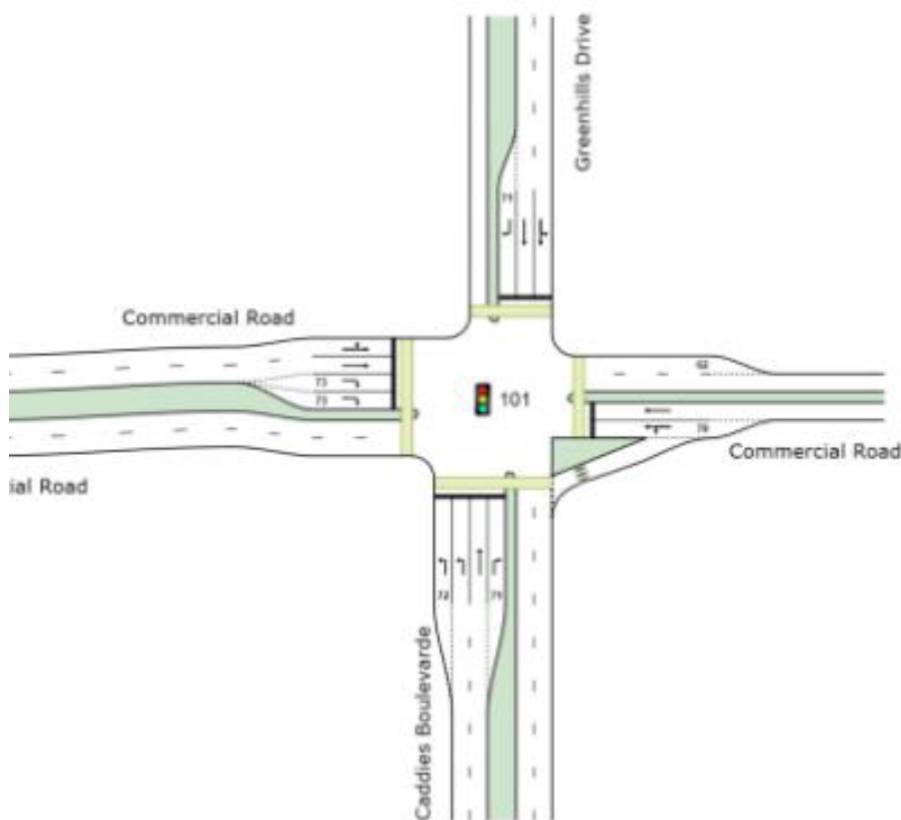


Figure 5. Future intersection layout of Commercial Road and Caddies Boulevard (source: Arup's traffic report)

9. Pedestrian and cyclist access

Pedestrian access is proposed from the northern, eastern, and southern perimeters of the proposed hospital with cycleways proposed along the western perimeter of the site in the north-south direction. It is unclear if the proposed pedestrian and cycle accesses along the western perimeter will be shared or separated. It is desirable to provide separated pedestrian and bicycle paths to resolve conflicts between pedestrian and cyclist movements and cater for future increased pedestrian and cyclist volumes as well as creating a safe and comfortable road environment to promote walking and cycling.

The original comments provided by Council staff included the following:

Public Transport options are readily available for the employee transport task, including the Metro rail line and a significant network of bus services. However pedestrian access to those services from the hospital site will need to be investigated in detail. Those pedestrian access investigation points include grade separated facilities across Windsor Road at Schofields Road, across Commercial Road at Windsor Road, and across Rouse Hill Drive within the town centre.

These locations are highlighted because additional volumes of pedestrians and cyclists crossing these roads at ground level will detract from the performance of the arterial and sub-arterial road network, leading to significantly greater delays and vastly reduced intersection capacity. A combination of pedestrian bridges, together with lifts and ramps, will need to be investigated at each location. It is noted that these improvements will be mainly aimed at the employees of the hospital because most of the "customer" transport task must be by private motor vehicle, but again, until the types of hospital services are known, it is difficult to estimate what transport task may need to be accommodated besides employees.

The traffic report does not include any investigation into grade separated facilities across Windsor Road at Schofields Road, across Commercial Road at Windsor Road, and across Rouse Hill Drive within the town centre as requested previously.

10. Parking

The traffic report states that 292 spaces are required for the proposed hospital as per THSC DCP (no details of the calculation has been provided) and the proposal will provide 235 car parking spaces which is not compliant with the DCP requirements. Parking provision for hospitals should not be compromised as majority of the patrons must commute by car and hospitals are traditionally seen as under-supplying car parking spaces. Shortage of parking provision will result in higher on-street demand and competition for spaces with the adjacent shopping centre.

Should you wish to discuss the above comments please contact me at kmckenzie@thehills.nsw.gov.au or on 9843 0319.

Yours faithfully

A handwritten signature in black ink, appearing to read 'KM', with a stylized flourish at the end.

Kristine McKenzie
PRINCIPAL COORDINATOR DEVELOPMENT ASSESSMENT



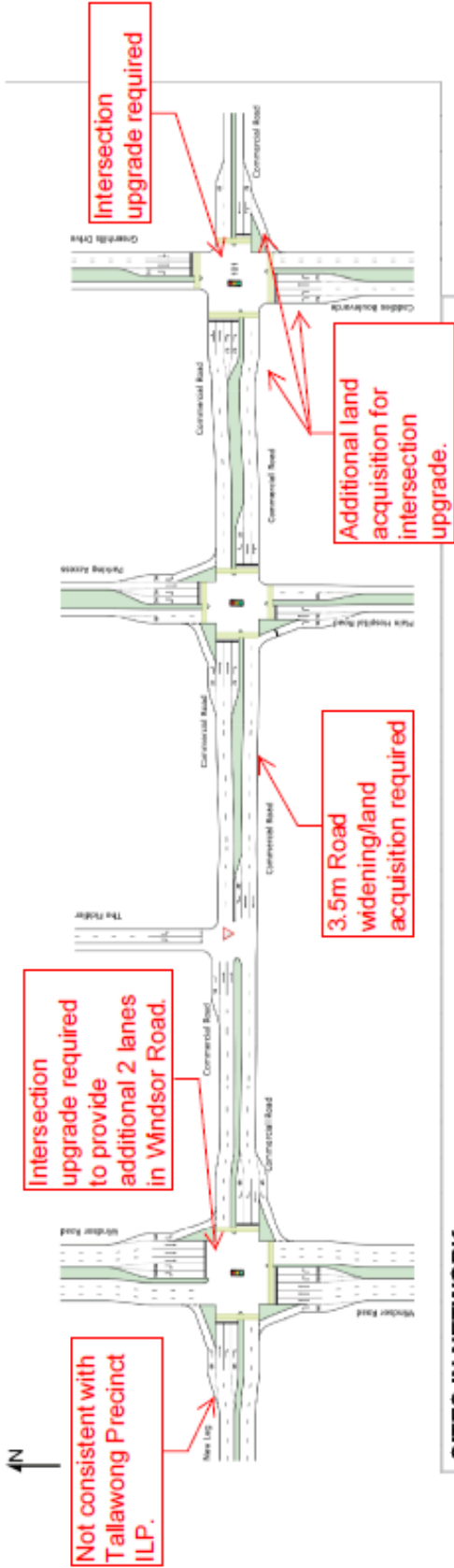
Figure 3-1: Precinct Road Hierarchy

NETWORK LAYOUT

Network: N101 [221004 AM_FU 2026 (Network Folder: General)]

New Network
Network Category: (None)

Layout pictures are schematic functional drawings reflecting input data. They are not design drawings.



SITES IN NETWORK

Site ID	CCG ID	Site Name
	NA	AM_FU_Windsor Rd / Commercial Rd
	NA	AM_FU_Commercial Rd / The Fiddler
	NA	AM_FU_Op3_Commercial Rd / Main Hospital Rd
101	NA	AM_FU_Commercial Rd / Caddies Boulevard



Figure 3-3: Concept sketch of upgraded Commercial Road / Main Hospital Road intersection