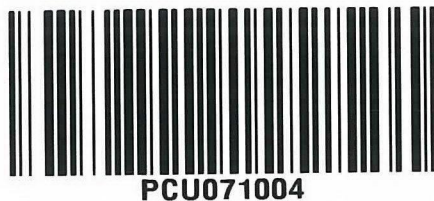


Parcel 24351
DTQ:MC



26 May 2017



The Director
Social and Other Infrastructure Assessments
Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001



Dear Sir

PROPERTY: LOT 12 DP 1159243, 170 MYALL STREET, DUBBO
YOUR REF: SSD 7720 - DUBBO HOSPITAL REDEVELOPMENT - STAGE 4

I refer to the State Significant Development Application SSD 7720 – Dubbo Hospital Redevelopment Stage 4 which was recently placed on public exhibition. Council appreciates the opportunity to provide comment regarding this very important development for Dubbo.

The following comments are provided to assist the Department in the determination of the application:

- The Application does not appear to have addressed Dubbo Local Environmental Plan (LEP) 2011, Clause 7.7 Airspace operations, with the western portion of the site located within the 325m AHD contour.
- The SEARS and the subsequent Development Application do not appear to have addressed Dubbo Development Control Plan (DCP) 2013, Chapter 3.5 Parking. Parking is a critical issue for the subject development and within this precinct. There has already been significant public comment regarding the availability of carparking for people attending the hospital. Accordingly, Council would request that this issue be addressed.
- The submitted Environmental Impact Statement (EIS) at 5.1.2 Development Contributions, states:

"In view of the above it is considered that no contribution levy should be applied to this SSD DA and that the Minister imposes no conditions in relation to contributions."

It should be noted that contributions for both Water and Sewerage were levied in accordance with Council's adopted Section 64 Policy for the preceding development stage. With regard to the current proposal, while it is agreed that the proposed development will provide a public benefit, it will still impact upon the local authority's (Dubbo Regional Council) infrastructure, resulting in costs to be borne by the local authority and ultimately, the community. As such, Council contends that Section 64 Contributions for both Water and Sewerage are applicable.

All communications to: **THE INTERIM GENERAL MANAGER**

ABN 53 539 070 928

PO Box 81 Dubbo NSW 2830

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Council's Section 64 Contributions Plan does not make specific provision for hospitals and as such, a more reliable document is the Water Directorate – Section 64 Determinations of Equivalent Tenement Guidelines 2017.

The rate is 0.9 ETs per bed for Water and 1.43 ETs per bed for Sewer.

3.3.2 of the EIS states that the *"... clinical building will provide an additional 50 beds, increasing the hospital's total number of beds to 221."*

Section 64 Water Contribution

$$\begin{aligned} &= 0.9 \times 50 = 45 \text{ ETs} \times \$5,487.00 \text{ per ET} \\ &= \mathbf{\$246,915.00} \end{aligned}$$

Section 64 Sewer Contribution

$$\begin{aligned} &= 1.43 \times 50 = 71.5 \text{ ETs} \times \$5,487.00 \text{ per ET} \\ &= \mathbf{\$392,320.50} \end{aligned}$$

- In relation to traffic arrangements for Stage 4 (SSD 7720), the proposed access arrangements identified in the GTA consultants 'Dubbo Health Service Redevelopment Stages 3 and 4, State Significant Development, Transport Assessment' dated 22/02/17 and in particular Drawing No.16S1359000-02-01-P6, Sheet 01 of 07, identifying proposed access re-arrangements off Myall Street and off the Cobbora Road roundabout are unacceptable to Council.

The Transport Assessment does not adequately address the issues and matters raised in Council's correspondence dated 12 July 2016 (copy attached). The Assessment makes mention of the matters raised by Council based on discussions held during the latter half of 2016. However, there has been no further contact which Council expected would occur for more detailed consultation on the conceptual transport proposals prior to the release of the Transport Assessment.

There are significant concerns which were initially flagged with the geometric realignment of Myall Street into the hospital property and intersection with Cobbora Road, and the potential traffic conflict in this locality, that have not been addressed to the satisfaction of Council. Council is disappointed that there has not been ongoing consultation on the transportation strategy and the potential opportunities available to enhance the long term accessibility needs for the Dubbo Base Hospital and the community.

Further concerns are raised regarding the proposed Myall Street realignment and associated intersection arrangement with McGuinn Drive and to a lesser extent the new access onto the Cobbora Road roundabout in that it may not provide the optimum outcome. It is noted that it would be some time before the transportation improvements would be implemented. As such, a holistic approach should be undertaken of the Dubbo Base Hospital redevelopment, with consideration of all the mitigating factors including

1. Strategic function and value of Myall Street and Mary McKillop Avenue as a Council public road or permanent road closure for Dubbo Base Hospital purposes as formal car parking areas.
 2. No resolution of the Myall Street access across the rail corridor.
 3. The proposed re-alignment of Myall Street being a public road into Dubbo Base Hospital property. Property adjustment required.
 4. The proposed traffic management comprising of the Myall Street realignment, McGuinn Drive intersection and new Cobbora Road access and transition appears to promote an environment for traffic and pedestrian conflict with constrained turning paths, short travel distances for driver interpretation and decision making, no vehicle separation into Myall Street.
 5. There are other service plans showing a proposed car parking area off Myall Street on the eastern side of the new Emergency Department but there is no reference to this car park in the Transportation Assessment. If this progresses then the traffic generation needs to be included in the assessment.
 6. Pedestrian connectivity on the south western corner from Cobbora Road.
- There are concerns regarding the indicative construction Truck Approach and Departure Routes (Figures 6.2 and 6.2 of the GTA Consultants, Transport Assessment). During past re-development(s) at the Hospital this area for construction traffic impacted severely on the operation of the Moran Drive Private Hospital precinct.
 - In respect to water supply, there appears to be multiple metered connections servicing the Hospital precinct. It would also appear that these metered connections are 'fed' from different town reservoir zones. Council does not have access to the internal potable water hydraulics for the Hospital. The aspect of multiple meter connections, plus potentially different zone feeds should be reviewed and potentially rationalised by the consultants (in consultation with Council's Water and Sewer Branch). Please contact Council's Manager Water Supply and Sewerage, Mr Stephen Carter, on 6801 4000.

I trust this is of assistance and any further enquiries should be directed to Council's Planning Services Supervisor, Darryll Quigley, during normal office hours, on 6801 4000.

Yours faithfully



Melissa Watkins

Director Environmental Services

Parcel 24351
AD16/24614
DTQ:EMMX

12 July 2016

Mr D Gibson
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001



Dear Mr Gibson

DUBBO BASE HOSPITAL REDEVELOPMENT STAGES 3 AND 4, MYALL STREET, DUBBO
YOUR REF: SSD 7720

I refer to your correspondence dated 27 June 2016 in relation to the proposed development of the Dubbo Base Hospital and the Secretary's Environmental Assessment Requirements (SEARs).

The following comments are provided to assist in the preparation of the SEARs and ultimately the Environmental Impact Statement (EIS):

- Key Issues: There is a requirement to address Orana Regional Environmental Plan No.1 – Siding Springs, which will be repealed 5 August 2016 and replaced by Dubbo Local Environmental Plan (LEP) 2011, Clause 5.14 Siding Spring Observatory – maintaining dark sky.
- Key issues: While noting that the draft SEARs make reference to heritage, the EIS shall address Dubbo LEP 2011, Clause 5.10 Heritage conservation.
- Key issues: The draft SEARs should be amended to include, that the EIS address Dubbo LEP 2011, Clause 7.5 Groundwater vulnerability, given the site is designated as 'moderately high'.
- Key issues: The draft SEARs should be amended to include, that the EIS address Dubbo LEP 2011, Clause 7.7 Airspace operations.
- Key Issues: The draft SEARs should be amended to include, that the EIS address Western Plains Regional Council (WPRC) Dubbo Urban Areas Development Strategy and specifically the Institutional Precinct Strategy (Health Precinct).
- Key Issues: The draft SEARs should be amended to include, that the EIS address Western Plains Regional Council (WPRC) Dubbo Development Control Plan 2013, Chapter 3.5 Parking.

- Key issues: While noting that the draft SEARs make reference to waste, the EIS should include: asbestos removal during demolition.
- Key issues: While noting that the draft SEARs make reference to noise and vibration, the EIS should address where work is proposed near residential properties. It is believed that there is also a basalt strip through the site, close to surface which may contribute to vibration impacts during construction.
- Key issues: While noting that the draft SEARs make reference to Contributions, Council's Section 94 Contribution Plans and Section 64 Water and Sewerage Contribution Policy apply to the proposed development.
- Plans and Documents: The Stages 3 and 4 redevelopment of the Hospital will increase additional traffic generation to the site and with the proposed increase in off-street parking areas and road realignment of Myall Street and the Hospital access road there will be the need to assess the transport and access impacts of the development.

While noting that the draft SEARs make reference to Transport and Accessibility, the EIS should specifically address the following issues:

- Consideration of the medium to long term strategic access and parking issues raised by Council and the development of options that would provide the most beneficial outcome for the community and the Hospital.
- The realignment proposal improves the geometric alignment of the Myall Street/Hospital access road with the Cobbora Road roundabout. However, there are concerns that with the new intersection and two new additional car parking areas in this location there will be a significant concentration of traffic creating an environment of congestion and turning conflict with the main Hospital access road that services the main northern carpark, emergency and other areas of the development.
- The realignment of Myall Street occurs within the Hospital property requiring the need for a boundary adjustment and dedication of public road. In the event that the Myall Street rail level crossing was opened there would be a functional change of the road corridor that would impact on the existing road geometry, alignment and on-street parking environment. As a consequence the proposed Myall Street realignment would not be suitable to accommodate the through and hospital traffic to the roundabout. As such, an alternative access to the Cobbora Road (Golden Highway) would be required further west of the roundabout through the Parkland with consideration given to the preferred traffic management required to both the existing roundabout intersection and the offset new Myall Street west intersection.
- Council has received advice from its Transportation Consultant that following the latest modelling that Myall Street does not need to be extended across the railway line, but rather the Cobbora Road (Golden Highway) railway level crossing requires

widening to 4 lanes in the short term. However, this has not been presented to Council for resolution. It has long been considered that Myall Street and Mary Mackillop Avenue functions as a Hospital Car Parking Area. It is quite obvious that with the recent redevelopment and the proposed new stages that there is the on-going need to provide appropriate off-street parking and an alternative access to Cobbora Road (Golden Highway).

- Currently, the Hospital off-street car parking areas appear at capacity, likewise Myall Street during the business day. Mary Mackillop Avenue at times can be at 60-70% capacity. Additionally, there will be two (2) new car parking areas at the south-eastern corner of the site to facilitate Stages 3 and 4.

Council strongly suggests that the assessment consider what part the Myall Street, Mary Mackillop Avenue and potentially some of the Parkland could play in facilitating broader access and parking requirements for the medium to long term strategic needs of the Hospital in the context that there will be no extension of Myall Street west.

- The Myall Street footpath shall be reconstructed and upgraded to concrete with contemporary standard cross fall and appropriate gradients at driveways and with regularly spaced kerb ramps. This area is regarded by Council as a 'Special Risk Zone' for pedestrians given the potential mobility limitations of those attending the facility and therefore public access should be 'accessible' in all senses of the term.
 - The facility should provide for cyclist access including appropriate secure bicycle storage/parking. Harmonisation of pedestrian and cyclist traffic on pathways should be accommodated.
- Plans and Documents: With stages 1 and 2 of the Hospital redevelopment, Council requested an overall stormwater strategy for the Dubbo Base Hospital site vide Council's letter dated 18 April 2012, which to our knowledge has not been submitted.

Council requests that an overall stormwater management plan be submitted for the fully developed site (existing stages 1 and 2 and proposed stages 3 and 4) as well as making provision for any proposed future expansion to address both quantity and quality discharge to existing systems. The plan should include information on post development discharge for all events up to and including the 1%AEP. Discharge from the site should not exceed the capacity of downstream systems, including existing culverts located within the adjoining railway lands.

The strategy should include proposals for on-site detention storage as well as addressing water quality issues which would include carpark discharge as well as gross pollutant generation from the site.

The proposed adjustments to the Myall Street entry/exit will have major impacts on stormwater infrastructure in this area and planning for this will need to be done in consultation with Council staff.

For any further information regarding this matter, please do not hesitate to contact Council's Planning Services Supervisor, Darryll Quigley, on 6801 4000 during normal office hours.

Yours faithfully

Melissa Watkins

Director Environmental Services