

Our Ref: **D22/1667**

03/11/2022

Karen Harragon
Director
Social and Infrastructure Assessments

Dear Sir/Madam,

Subject: Councils Submission to the St George Hospital Redevelopment Stage 3

NSW Application Number: SSD-39170713

Property: 16 Kensington Street KOGARAH 2217

Proposed Development: Demolition works and construction of a 9 Storey building with a 3 level basement, landscape and ancillary works

Council has been advised on the 5th October 2022 of a State Significant Development at St George Hospital concerning the Stage 3 redevelopment. Council understands the proposal to involve the following:

- Demolition of the existing Prince William Wing and removal of one tree.
- Bulk earthworks (including shoring).
- Construction and operation of a new 9 storey integrated Ambulatory Care Building (ACB) (excluding 3 storey basement) to provide:
 - Outpatient, ambulatory and integrated care services.
 - Pathology specimen collection. - Outpatient pharmacy.
 - Enhanced medical imaging.
 - New day rehabilitation unit.
 - Rehabilitation inpatient unit.
 - Acquired brain injury unit. - Sub-acute aged care unit.
 - Behavioural management unit.
- Basement car parking for 151 car parking spaces, 2 patient transfer drop-off bays and pick-up, drop-off bays along Kensington Street.
- Landscaping, including the planting of 34 new trees and public domain works.
- Inground building services works and utility adjustments

Council is generally supportive of the redevelopment noting the importance of the renewal and expansion of health facilities serving the Georges River community, but requests the following comments to be considered as part of the assessment of the proposal.

Planning Comments

Council provides the following comments in relation to the Planning matters applicable to the proposal:

The proposal is subject to the Georges River Development Control Plan (GRLEP) and Georges River Development Control Plan (GRDCP). As per the GRLEP there is no minimum height or FSR under the applicable to the site. From a strategic context, Council is supportive of the height. The site is affected by flooding and is located within proximity to multiple heritage items. These items are addressed in the urban design and stormwater comments.

With regards to the GRDCP, the subject site is within the Kogarah Town Centre specifically Kensington Street Precinct and the hospital precinct. There are multiple non-compliances with these controls which are urban design and future character related. The urban design comments are addressed below in which there should be an emphasis on increasing street activation.

Council considered there to be a lack of open space in the wider strategic context and is supportive of the open space proposed but is concerned that there is a lack of defined purpose to this space in the provided documentation. The principals of Crime Prevention Through Environmental Design are also requested to be considered in the open space due to its public domain interface.

Urban Design Comments

Councils provides the following comments in relation to the Urban Design matters applicable to the proposal:

- a) Height Transition** - Heritage items in proximity to the subject site include:
- 17 Kensington Street Kogarah – Former Kogarah Presbyterian Church and Hall (opposite the proposal)
 - 13 Kensington Street Kogarah – Former Kogarah Presbyterian Church and Hall (opposite the proposal)
 - 26 Gray Street Kogarah – Kogarah Fire Station (corner of Kensington Street and Gray Steet)

The proposal 3 storey podium along Kensington Street measures around 16m. In the absence of any context on the plans, it is difficult to ascertain the impact of the street wall height on the heritage items.

Appropriate height transition should be provided to the lower scaled existing heritage items by applying principles of angular planes and minimum horizontal separation distances to ensure the hospital building fits within the existing and planned context and minimise the impact of bulk and scale on the heritage items and streetscape.

- b) Building Bulk and Scale / Building Façade**

An effort has been made to minimise the perceived bulk and scale by incorporating a podium and tower typology, a 6m setback to the tower component along Kensington Street and variation in materials. As stated under 1.0 above, the podium height should provide appropriate transition to the lower scaled heritage items.

The 95m long 4 storey tower incorporates an enclosed cantilevered terrace on level 5 to add interest to the façade, however considered inadequate to break the building mass given the proposed length of the facade. The cantilevered balcony is not well integrated with the façade and appears as an “add on” and adds to the building bulk. The white colorbond speed panes emphasise horizontality and add to the building bulk.

Except for the tower setback, the building lacks composition of massing and the 95m long unarticulated tower is considered bulky and will dominate the streetscape, especially in the context of the three heritage items in vicinity of the site. The building facades are a mundane repetition of architectural details and materials.

It is assumed that the use of exposed bricks for the podium is an attempt at heritage interpretation and to address the existing context. However, the excessive use of the exposed brick is considered overwhelming and the podium and tower are not integrated and not perceived as a single entity.

Given the 95m length, the building should provide substantial articulation. In spite of the use, it still is possible to break the building mass by recessing or projecting certain building elements and a balanced composition of massing, building elements, textures, colours and materials to minimise the perceived bulk and scale. Some of the detailing, textures or materials should either be extended from the podium to the tower or vice versa to present an integrated building.

In general, it is advised that the architectural expression of the elevations and overall built form be amended to enhance the visual appeal of the building. The extensive use of exposed brick that is enhancing the building bulk should be avoided. Vertical architectural detailing should be introduced to break the horizontality. The intent should not be to replicate the heritage items / materials but to provide an interpretation by the use a palette and architectural detailing that will integrate both the existing and proposed developments.

c) Public / Private Interface

The use of a colonnade (combination of square and circular columns) along Kensington Street is not considered appropriate for the context and a barrier to seamless pedestrian circulation. Colonnades should be avoided.

The pedestrian entrance off Kensington Street is not clearly identifiable or contribute to the identity of the building.

The ground floor skylights are the brick façade (BR1) on Level 1 along Kensington Street adds to the dead frontage, where “active frontage is desired under GRDCP 2021. Street activation along Kensington Street should be enhanced and “dead frontages” avoided.

The substation and driveway, although an integral part of the façade still dominate the streetscape given that the built form is recessed. The substation should be setback from the boundary, while the built form built to edge to activate the street.

If security gates are proposed for the basement entry, it should be setback from the site boundary. Solid roller shutters should not be proposed. An open grille shutters should be used.

d) Sustainability/Topography

In the absence of a survey plan, it is difficult to establish the topography of the subject site. If the site has considerable slope, the proposal should be designed to address existing natural ground by varying the finished floor levels (FFL) to minimise cut and fill and ramps and steps. The hospital entrance should be at the same level as the existing footpath level.

The ground floor is proposed to be entire below the existing natural ground to the north (along Kensington Street), south and west. In addition to the proposed excavation for the 3 levels of basement, the ground floor will increase the required excavation by 3.83m.

It is acknowledged that hospital is a non-residential use and reliance on artificial light sources is common. However, the lack of natural light / reliance on artificial sources and visual connection to the outdoors is considered avoidable and undesirable to the users of the space. In addition, the excessive excavation is not considered sustainable.

The ground floor should entirely be above the natural ground to provide appropriate activation of Kensington Street and the design should address the topography. If ground floor is above ground, the podium height should be sympathetic to the heritage items and streetscape.

e) Open Space

The proposed open space at the corner of Kensington Street and Belgrave Street should be well integrated with the built form. Providing visual / physical connection to the proposed open space should be provided from the existing buildings to enhance passive surveillance and usability of the open space.

Stormwater Comments

Council provides the following comments in relation to the Stormwater matters applicable to the proposal:

a) Stormwater drainage & On-site Stormwater Detention

A Stormwater Concept Plan prepared by a qualified civil/stormwater engineer in accordance with the requirements of Clause 2.1 of Council's adopted stormwater Management Policy (SMP) is required to be submitted, along with Council's Stormwater and OSD Documentation Checklist.

The Stormwater design is required be in accordance Council's adopted Stormwater Management Policy (SMP) and AS/NZ 3500.3.2003.

Impervious area calculations of the site are required to be done in accordance with the Appendix – A7 of the Stormwater Management Policy (SMP) and submitted to Council for review, with the stormwater design to be in accordance with these calculations.

Provision of On-site Stormwater Detention is required. OSD volume must be based on the development site area. If there is an existing OSD onsite based on the total site area, details of the existing drainage, including OSD details must be submitted to the Council

OSD volume calculations are required be calculated using Table -3 of the Stormwater Management Policy.

The Stormwater and OSD documentation check list (Appendix –A1 of the SMP) are required to be completed by the consulting engineer and submitted together with the submission.

b) Flood

As indicated, the subject site is affected by Probable Maximum Flood.

As this is a sensitive development, the applicant shall provide a flood impact report addressing the requirements of the flood matrices as described in the Chapter 6 of the SMP.

Flood impact report shall be prepared by a qualified practicing stormwater drainage engineer with familiarity with flood issues. The flood impact report shall address the following: Hazard levels, Floor levels, Flood Affection and Freeboard, Structural Soundness, Emergency Evacuation plan and provide recommendations.

The applicant shall provide a full assessment report of Overland flow and flood in accordance with Clause 6 of the SMP.

c) Stormwater quality requirements

Stormwater quality requirements must be adhered to comply with the Cl 7 of the SMP.

The SMP can be obtained from the following link:
<https://www.georgesriver.nsw.gov.au/StGeorge/media/Documents/Council/Governance/Codes%20and%20Policies/Pol-073-01-01-Stormwater-Management-Policy-April-2021.pdf>

Traffic Comments

Council provides the following comments in relation to the traffic matters applicable to the proposal:

a) Floor to Ceiling Heights- Disabled Persons Parking

Car space dimensions and head clearances for the disabled persons parking spaces in Basements 2 and 3 will need to comply with the requirements of s2.4 "Headroom" of AS/NZS 2890.6:2009 *Parking Facilities Part 6 – off street parking for people with disabilities*.

b) Bicycle Parking- secure facility

Bicycles are to be stored in a secure facility and comply with the requirements of AS 2890.3:2015 *Parking Facilities Part 3: bicycle parking*

c) Bicycle Parking - public use

Bicycle racks or hoops should be installed close to the facility such as in the forecourt area for use by the public.

d) Car Share Spaces

Consideration should be given to providing spaces within basement one to cater for car share vehicles as per s3.13 Parking Access and Transport - clause 46: "Car Share" of GRDCP2021

e) Electric Vehicle Charging Stations

Car parking areas should be designed and constructed so that electric vehicle and bicycle charging points can be installed now or later.

f) Pedestrian Facilities – Kensington Street

Consideration should be given to installing facilities for pedestrians to safely cross busy Kensington Street in the vicinity of the entry doors.

Pedestrian facilities are considered warranted having regard to there being only one formal location to cross Kensington Street between Gray Street and Belgrave Street with that being at the signalized intersection of Kensington Street and Belgrave Street some 100m to the north-east.

g) Access Control to Basement Car Parks

Consideration should be given to installing controls to prevent the basement car parks being used for parking other than for the purpose intended.

It is highly likely the car park will be seen by the public as additional parking for the hospital in general and hence parking availability for those associated with the development may be reduced.

h) Pedestrian Sight Lines – Vehicle Entry/Exit Driveways

The design of the western wall of the building which separates the access driveways to above ground and below ground car parking areas will need to be modified to provide pedestrian sight triangles as per s3.2.4 "*Sight distance at access driveway exits*" of *AS/NZS2890.1:2004 Parking Facilities Part1 -off street car Parking*

i) Left In/Left – Kensington Street Driveways

Having regard to the vehicular access point being in close to the intersection of Kensington Street and Gray Street, consideration should be given to installing a median island on Kensington Street to limit turn movements at the driveways to left in/left out.

The presence of a slip lane for the left turn from Gray Street into Kensington Street often results in vehicles travelling in two lanes between the roundabout until just past Kensington Lane. The roadway is not intended for one lane of traffic only and there is a heightened risk of rear end type crashes occurring should eastbound vehicles in Kensington Street be stopped while waiting to turn right into the car park.

j) Landscaped kerb blisters on Kensington Street

Consideration should be given to extending the length of the north-eastern kerb blister closer to the Belgrave Street intersection to reduce the incidence of drivers dropping off/picking up passengers in what will be an adjusted/lengthened "NO STOPPING" zone.

k) Work Zones

The installation of Work Zones on any roads requires an application to and the prior approval of the Georges River Traffic Committee prior to installation.

I) Construction Access Routes

Figure 5-2 "Construction access routes" contained in the Traffic and Transport Impact Assessment prepared by SCT Consulting dated 2 September 2022 is considered unsatisfactory as follows:

- (a) The plan does not reflect there are full time, "NO RIGHT TURN" restrictions in place for all southbound traffic on the Princes Highway from the traffic signals at the Princes Highway and Regent Street to the traffic signals at the Princes Highway and Jubilee Avenue, Carlton.
- (b) Regent Street and Jubilee Avenue where right turns are permissible have schools either directly fronting the roadways or in streets close by. Heavy vehicle along these roads should be restricted during the busy drop off/pick up times.
- (c) The left turn for northbound traffic on the Princes Highway into Kensington Street at an acute is unsatisfactory for the 19m long, truck and dog combination.

Any construction vehicle and pedestrian management plan should:

- be forwarded to Council for approval prior to any works commencing on site as it is assumed Council's officers or NSW Police will be responsible for enforcing compliance with the plan.
- contain swept wheel path drawings for heavy vehicles at required locations including gaining access into and out of the site
- Include the routes to be taken within the boundaries of the Georges River Local Government Area, not only the routes near the site.

Additional Comments

Any works that are proposed to occur on Council land are to seek separate approval. In addition, it is to be noted there are street finish materials that Council has defined for the area. This should be incorporated into the proposal (information can be obtained by contacting Council's Assets and Infrastructure team).

Council requests that a Waste Management Plan be provided for the site and a Plan of Management that includes emergency evacuation procedures.

In conclusion I reiterate that Council is generally supportive of the proposal given the significant benefits to the health of the Georges River community and the economy of the Kogarah Town Centre, but requests that the matters in this letter are considered as part of the assessment to ensure that the infrastructure renewal is in keeping with the strategic context of the Kogarah Town Centre and interacts appropriately with the surrounding public domain.

Should you need any further assistance or clarification, please do not hesitate to contact me on 9330-9369.

Regards,



Liam Frayne
Manager of Development and Building