

ATTENTION: GPO Box 39

Planning & Infrastructure
Major Project Assessments
Department of Planning and Infrastructure

Dear SYDNEY NSW 2001

SSD-5250

YOUR REF: DUBBO BASE HOSPITAL, MYALL STREET, DUBBO.

I refer to the State Significant Development placed on public exhibition for the redevelopment of Dubbo Base Hospital. Council supports the proposal and the delivery of further health infrastructure for the city. The following comments are provided to assist the Department in consideration of the proposal and to highlight a number of issues requiring further information or clarification:

1. Staged Development

The Environmental Impact Statement (EIS) makes the frequent mention of the development being undertaken in 2 Stages, however there is no reference to the staged development provisions of the Environmental Planning and Assessment Act, 1979.

It appears that Stage 2 is the expansion to a 3rd storey to the building should funds become available. It is considered that this is not relevant to the current proposal and the EIS should clarify this matter.

2. Development plans

The submitted plans in Appendix B by Cox Richardson Architecture, do not contain actual dimensions, which is required by Schedule 1, Environmental Planning and Assessment Regulation 2000.

3. Director General's Requirements

The Director General's Requirements for the project included compliance with Clause 6, Schedule 2, Environmental Planning and Assessment Regulation 2000, which states:

An environmental impact statement must contain the following information:

- (f) a declaration by the person by whom the statement is prepared to the effect that:*
 - (i) the statement has been prepared in accordance with this Schedule, and*
 - (iii) that the information contained in the statement is neither false nor misleading.*

Council's review of the EIS has not shown this information as being included.

4. Myall Street

The potential reopening of the Myall Street railway crossing and any impacts (amenity, access, on-street parking, etc.) including long term car parking needs and locations have not been addressed. This information was provided in Council's correspondence dated 18 April 2012 to the Department of Planning and Infrastructure.

5. Infrastructure Services

There are no details showing sewerage services, new in ground potable water, hydraulic or fire services.

The public exhibition documents including Appendix D Review of Environmental Factors, Appendix C Hydraulic Services Drawings, don't provide any plans. The hard copies provided to Council refer to the attached CD, however those details are not contained on the attached CD.

There is no information in relation to the drainage to the north towards River Street including information on water quality, gross pollutant traps, etc. Also there is no overall catchment plan supplied for stormwater management.

It is considered that the interaction of the detained flows with the existing catchment flows need to be addressed so that the peak flows do not coincide to create an issue. In addition, the overland flows along Myall Street will end up in the railway drain, which may be an issue in larger events.

The downstream underground system may not be a 1 in 10 year system. Council design standards require that this system be designed to a 1 in 10 year system.

It is unclear if the design takes into account any upstream flows from the east and whether they impact on the proposed development. In addition it is unclear if the design allows for future expansion of the site or is it expected that further development will remain within the existing building footprint.

6. Vehicle parking

Existing parking on the land is proposed to increase with an additional 48 vehicle parking spaces. However, the parking analysis has not considered if the existing parking on the land was adequate and the overall demand of the hospital campus.

It should also be noted that the EIS has contradictory statements in relation to parking spaces. They are stated as currently 350 (staff, patients & visitors) p.8, though the existing carpark (augmented & regraded) to 289 spaces (net gain of 48 spaces) p.18 & p.36.

Council appreciates the opportunity to comment on the proposal. It would be appreciated if Council was provided with a response to the matters raised above.

For any further information in relation to this matter, please contact Darryll Quigley, Council's Senior Planner on 6801 4000 during business hours.

Yours faithfully

Melissa Watkins
Director Environmental Services