

Your ref: SSD 7058
File no: MC-15-1169

3 December 2015

Social Infrastructure Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: MayTien Banh

Dear Ms Banh,

Re: SSD 7058 Blacktown Hospital Stage 2 Concept Proposal and Enabling Works, Marcel Crescent, Blacktown

I refer to your correspondence dated 26 October 2015 requesting that Council provide comments on the proposed State Significant Development lodged under Part 4 of the *Environmental Planning and Assessment Act 1979* ("the Act") for the above proposal.

The proposal has been reviewed by Council officers and a range of issues have been raised and listed in **Attachment A** to this letter, which are requested to be addressed to Council's satisfaction by the proponent before any determination of the proposal is made by the Department.

We strongly object to the proposal requiring Hospital staff being forced to pay for on-site parking and/or having to rely on street parking which is not in the immediate vicinity of the Hospital site.

Should the Department support the approval of this application, please refer to **Attachment B** for recommended conditions of consent.

If you would like to discuss this matter further, please contact me on 9839 6228.

Yours faithfully,



Judith Portelli

Manager Development Assessment

ATTACHMENT A

The following recommendations are outlined below:

Traffic Management and City Asset Matters

Parking

1. The proposal indicates that the parking assessment relies on the availability of all day on-street parking for staff and visitors where they do not wish to utilise on-site paid parking. As previously raised with Health Infrastructure, please be advised that Council will shortly be introducing the trial of a permit parking scheme in the Blacktown Medical precinct. The parking in the streets near Blacktown Hospital will be limited to two hours parking, which is likely to increase the demand for on-site parking for the Hospital.

Therefore the forecast for the provision and timing of on-site Hospital parking is to be reviewed so as not to rely on street parking.

Public Transport

2. To reduce the reliance on car travel to and from the hospital, improvements to the location and frequency of bus servicing should form part of the access and transport strategy supporting the development proposal.

In addition, we have been making representation to the State Government for the introduction of a free shuttle bus service from Blacktown Station to Blacktown Hospital, and a similar service from Mount Druitt Station to Mount Druitt Hospital.

This project would provide the catalyst for these services, and your support to the Minister for Transport and Infrastructure to have the services provided would be appreciated.

The reintroduction of this service would be a positive component of your transport strategy.

Improved access arrangements

3. The current access to the hospital via the small roundabout at the intersection of Marcel Crescent and Panorama Parade is considered inadequate for the proposed size of the Hospital. The local road network adjacent to the Hospital is primarily residential, and is not planned for the traffic demand created by the Hospital.

Whilst there will be an additional left in left out access from Blacktown Road, a higher capacity access is required. In this regard, we request consideration be given

to developing an access directly opposite Wall Park Avenue via the existing traffic signals on Blacktown Road. Whilst we recognise this will involve the acquisition of 2 properties, we consider that the scale of this development demands this level of access.

Planning Matters

4. As identified in Point 1 above, the parking assessment places reliance on public parking to cater for parking demand. Due to the introduction of a trial permit parking scheme, further consideration is required to cater for the parking needs of staff and visitors.

We strongly object to the proposal requiring Hospital staff being forced to pay for on-site parking and/or having to rely on street parking which is not in the immediate vicinity of the Hospital site.

The following is required to be addressed:

- a. The proposal indicates that separate Development Applications (DAs) will be lodged for the purpose of expanding the Stage 1 multi-car park by an additional 180 parking spaces, and for the construction of the Stage 2 multi-storey car park for 303 parking spaces. However, this approach does not ensure that these DAs will be lodged and approved to correspond with the operation of the Stage 2 building, in particular given the increased demand for on-site parking due to the likely implementation of the permit parking scheme.

The Proponent is requested to demonstrate the timing of the lodgement of these DAs and their intended construction programme to deliver these car parking structures.

Please note that suitable conditions are also recommended to be imposed on any consent issued which requires future traffic and parking studies to be undertaken to ensure that sufficient parking spaces are provided in response to parking demand at the various development stages as some car park areas are closed and others become available, as described in the construction programme.

- b. Details of the Hospital's paid parking scheme are to be provided which includes consideration of how this will be managed and who is responsible for its operation. Details are to include the incremental hourly rates or all day rates to be applied, any fines / penalty notices likely to be issued, and the dispensations for staff, persons with a valid disabled parking permit and treatment plans.

This paid parking scheme is required to be implemented in a fair and equitable manner, as is Council's consistent approach for any paid parking scheme within the Local Government Area. This is to include details of the implementation and management measures, such as a boom gate and issuing of tickets, or a 'pay and display' scheme, etc., and how this will be managed.

Council is also concerned that any exorbitant pricing of parking is not in keeping with the socio-economic needs of the Blacktown community and will further exacerbate the on street parking problem as onsite parking is not affordable for regular patients and visitors on site.

5. Given the high likelihood of the Stage 1 two storey addition and the Stage 2 multi-storey building being required to be constructed in order to respond to parking demand; these structures are recommended to be included in the 'Indicative Building Massing' study. This is to demonstrate that all current, approved and future building forms on the site are considered as a whole. It is requested that the future DAs for the Stage 2 development works comprise suitable architectural design measures to ameliorate the bulk and scale of all development works in a cohesive manner.
6. The proposal identifies that up to 220 off-site car parking spaces will be available at the nearby Blacktown Bowling Club for construction workers. Given this parking area is likely to be accessed prior to 7am and during the day with persons passing several residential properties, concern is raised that the amenity of these residential properties will be adversely affected.

The Construction Management Plan is to be extended to include this off-site car parking area so as to minimise adverse noise and general amenity impacts for the nearby residents. This is to be communicated to users of this car parking area at the relevant site induction.

ATTACHMENT B

Recommended Conditions of Consent:

Engineering Conditions

The engineering plans are required to comply with the following:

1. Australian Rainfall and Runoff – A Guide to Flood Estimation, Volumes 1 and 2 (1987);
2. SA/NZS 3500.3.2 National Plumbing and Drainage Part 3.2: Stormwater Drainage – Acceptable Solutions;
3. On-Site Stormwater Detention Handbook (Fourth Edition, December 2005) – Upper Parramatta River Catchment Trust;
4. Managing Urban Stormwater – Soils and Construction Volume 1 (4th Edition March 2004) – NSW Department of Housing;
5. Blacktown City Council Engineering Guidelines for Development – 2015; and
6. **New** Blacktown City Council Development Control Plan 2015 Part J Water Sensitive Urban Design and Integrated Water Cycle Management.

Planning Conditions

7. Should valid noise complaints be received from the public with regard to construction noise and vibration, the hours of construction are required to be restricted to reflect the “standard” hours as per the EPA Guideline, being Monday to Friday 7am to 6pm, and Saturday 8am to 1pm only.

The contact details of the nominated site officials are also to be provided to Council should noise complaints be received.

Environmental Health Conditions

Advisory

8. The applicant is advised to consult with:

- (a) Sydney Water Corporation Limited
- (b) An Energy Provider
- (c) Natural Gas Company
- (d) The relevant local telecommunications carrier

regarding any requirements for the provision of services to the development and the location of existing services that may be affected by proposed works, either on the land or on the adjacent public road(s).

All approved building construction plans attached to the Construction Certificate should be submitted to and stamped by a Sydney Water Corporation Limited Customer Centre or a Sydney Water Quick Check Agent as an indication that the proposal complies with the Sydney Water requirements. Sydney Water may also require the applicant to obtain a Trade Waste Approval as part of the operation of the approved development. Enquiries should be made to ascertain the Sydney Water requirements for the eventual operation of the approved use.

9. Information regarding the location of underground services may be obtained from the Sydney "Dial Before You Dig" service, telephone number 1100, fax number (02) 9806 0777. Inquirers should provide the street/road name and number, side of street/road name and the nearest cross street/road name.
10. Prior to any demolition works, all services or utilities should be disconnected in consultation with the relevant service provider.

Pre Construction Certificate Matters

11. An acoustical assessment shall be submitted to Council for consideration outlining the effect of the adjoining industrial area on the proposed development.

During Construction

12. Any asbestos material is to be handled and treated in accordance with the WorkCover document "*Your Guide to Working With Asbestos - Safety guidelines and requirements for work involving asbestos*" dated March 2008.

Operational

13. Any activity carried out in accordance with this approval shall not give rise to air pollution (including odour), offensive noise or pollution of land and/or water as defined by the Protection of the Environment Operations Act 1997.
14. All waste generated on the site is to be stored, handled and disposed of in such a manner as to not create air pollution (including odour), offensive noise or pollution of land and/or water as defined by the Protection of the Environment Operations Act 1997.
15. In accordance with the requirements of Part 5.7 Protection of the Environment Operations Act 1997, Council is to be informed of any pollution incident that occurs in the course of carrying out the approved activity where material harm to the environment is caused or threatened.