

Date: 8 October 2018



Mr David Gibson
Team Leader
Social Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

**Subject: SSD 9036 - Redevelopment of Concord Repatriation Hospital (Concept and Stage 1)
1H Hospital Road, Concord**

Reference is made to the exhibition of the development application for the redevelopment of Concord Repatriation General Hospital (SSD 9036), located at 1H Hospital Road, Concord West. The application has been reviewed by Council staff, and the following issues have been identified.

Council would now appreciate the following issues being considered and addressed as part of the development application assessment and prior to the determination of the subject development application:-

Traffic/Parking Comments:

- The traffic and parking analysis includes an increase of the staff car occupancy rate to 1.09 from the existing 1.03. There appears to be no analysis provided that justifies this increase. This increase has, in turn, been used to calculate lower traffic generation rates and lower parking requirements. Given factors such as variable shift times/days that currently result in a very low staff car occupancy rate and these factors continuing into the future, it appears unlikely that the staff car occupancy rate would increase as stated in the traffic and parking analysis. Should the staff car occupancy rate remain at 1.03, the total parking demand for Stage 1 would increase from 2381 spaces to 2490 spaces and is, therefore, likely to exceed the practical capacity of the proposed approximately 2539 spaces.
- The traffic report indicates that there are currently 1,985 staff with approved parking permits and 550 staff on a waiting list. Given that the proposal purports to accommodate all the staff parking demand off-street, approval of the development should include a condition that prevents a limitation being placed on staff obtaining permits. Such a limitation forces the use of on-street parking as is currently observed in surrounding residential streets where Resident Parking Schemes are not in operation or outside of their hours/days of operation. This is particularly the case in Iandra Street and Colane Street at present, however, these streets do not appear to have been included in the surveys of existing parking demand associated with the hospital.
- It is indicated that the existing carparking configuration comprises of 1,890 standard car spaces and 67 accessible spaces. Whilst it is indicated that a total of approximately 2539 spaces will be provided following the completion of stage 1, no detail is provided on the number of those that will be accessible and how this will accommodate demand. The Traffic Report notes a "high number of vehicles with disability permits" in Hospital Road. It is apparent that this is partly due to the fact that disability permits exempt vehicles from the on-street metered parking fees but not the fees in the hospital carpark. Consideration should be given as to how vehicles displaying disability permits can be best accommodated off-street.

- Inadequate detail is provided with regard to the proposed 'mini roundabout' and raised pedestrian crossing to its east. Of the details provided it is apparent that the proposed entry on the north side of Hospital Road is poorly aligned with the entry on the south side of the road. It is also apparent that investigations are required into the continuity of the footpaths along the north and south sides of Hospital Road past the proposed roundabout. Negotiations over land ownership and maintenance obligations are also required noting that the proposed roundabout extends into the hospital property. As the design of the roundabout is a critical element of the successful operation of the proposed development, its design should be further refined at this stage before the planning of the proposed development progresses further.
- Anecdotal evidence indicates that there are significant queuing issues during the morning peak due to the high number of staff attempting to enter the boom gated carpark on the north side of Hospital Road. Whilst it is noted that the capacity for entering vehicles has increased due to an additional boom gate being provided, no analysis has been provided on the adequacy of the proposed arrangement to accommodate anticipated demands. The Stage 1 design for the decked carpark would appear to provide an excellent opportunity for these queueing issues to be potentially resolved.
- The intersection capacity analysis does not account for other background traffic increases which are particularly significant at the intersection of Concord Road and Homebush Bay Drive. Notwithstanding this, the analysis concludes that the subject intersection would operate at a poor level of service. It is apparent that a state government commitment is required with regard to the upgrade of the intersection of Concord Road and Homebush Bay Drive as part of the proposed redevelopment of the hospital.
- The traffic report indicates delays where Concord Road intersects with Hospital Road and where it intersects with Killoola Street 'are mainly due to traffic at the downstream intersection/s'. This statement does not discount there being capacity issues at these intersections should upgrades to the intersection of Concord Road and Homebush Bay Drive be realised. An analysis should be undertaken of the intersection of Concord Road and Hospital Road in particular to determine if upgrades to that intersection are likely to be required.
- Council would encourage NSW Health to investigate all potential options for providing expanded transport options to and from the hospital site for staff and visitors given the significant increase in the size and scale of the hospital facility under this redevelopment proposal and to encourage staff and visitors to be less reliant on private vehicles. It is noted that the parking fees for staff set out in the Green Travel Plan are very low and that potentially increasing these fees would discourage the use of private vehicles by staff and alternatively encourage staff to use alternative means of gaining access to the hospital. Council supports the conclusions and recommendations contained the Green Travel Plan and would be willing to work with NSW Health to achieve the initiatives set out in the Plan including supporting NSW Health in any submissions made to the relevant Government Ministers to improve public transport options for the area.
- It is also noted that a significant proportion of staff live outside the Canada Bay Local Government Area and that this could potentially be addressed through affordable housing initiatives that encourage hospital staff to live in closer proximity to the hospital site. Council would be prepared to enter into further discussions with NSW Health to investigate such initiatives and any other options that would address this issue.

Stormwater Management

- It is noted that the flood study has been carried out based on existing structures and the Stage 1 proposal. The Flood study/analysis should be based on entire proposed development to include all stages of the redevelopment.
- Stormwater from the catchments which will be discharged to Council's drainage system along Hospital Road will require an On Site Detention (OSD) system to be in place for the stormwater management.
- It is noted that the proposed Multi Storey Car Park (MSCP) will discharge to the north & further investigation is required to determine the size and location of the existing stormwater infrastructure. The outcome of these investigations should be included in the final report and should also be incorporated into any redesign on the Civil Plans.
- It is noted that the Civil Report prepared by TTW does mention the provision for water quality systems but there are no detailed drawings or MUSIC model results provided to support the stormwater quality targets as outlined in Council's DCP.
- The design of internal drainage system must take into consideration all surface runoff/overland flows from adjoining sites. The design of the internal drainage system will require the submission of longitudinal sections. All trunk drainage long-sections will need to include invert levels, finished ground/grate levels, design flowrates, pipe sizes and class, service crossings and a hydraulic grade line. The design documentation should include Stormwater concept design and reports, sub catchment plans, Stormwater calculations, Overland flow analysis, Water quality plans etc.
- A formal overland flow path must be provided to ensure that, should the underground drainage system become blocked or if the design storm is exceeded, a safe overflow route for stormwater is available for which runoff can be safely conveyed to the Yaralla Bay. Drawings should be included to show the proposed formal overland flow routes.
- Written approval will need to be obtained from the relevant authority (RMS) and submitted to Council for the construction of the outlet along the seawall at Yaralla Bay.

Civil Works

- Civil works within road reserves require approval under Section 138 of the Roads Act 1993 from Council. A separate set of civil plans will need to be submitted to Council and an approval shall be obtained prior to the commencement of any works.
- It is noted that a roundabout/intersection and footpath works has been proposed at Hospital Road. Detailed designs including footpath connection details at the Roundabout/intersection will need to be provided to Council. Plans will need to include long sections and cross sections.
- All car parking spaces are required to comply with AS/NZS2890.1:2004 Off Street Car Parking Code.

Heritage Comments

The proposal will have an adverse impact on the heritage values of Concord Hospital as it will result in the loss of buildings, spaces and landscape features that were part of the original hospital. The proposal will also adversely affect the setting of the original hospital buildings, in particular the main building, the multi-ward block.

Demolition of historic components

The proposal includes the demolition of a number of historic buildings and landscape features. It is unfortunate that an alternative design which included the retention of more historic buildings and the tennis court could not have been developed. The tennis courts are an original landscape feature that demonstrates the important role recreational activities played in patient treatment.

The Statement of Heritage Impact (dated 21 June 2018, prepared by Biosis) submitted with the proposal recommends archival recording as a mitigation measure in relation to some of these buildings. This is supported, however, buildings in addition to those noted in the Statement of Heritage Impact, should also be archivally recorded as these buildings are also historic buildings, although altered. Buildings and features of the site which should have an archival recording prepared prior to demolition are set out below:-

- Buildings numbered 10, 11, 14, 15, 16, 17, 18, 19, 63, 64, 65, 67, 72 and 73 on the plan shown in Plate 19 "Existing Buildings at Concord Repatriation Hospital 2015", page 56 in the Statement of Heritage Impact.
- The tennis courts, including photos of their setting.

The archival record must include original plans at 1:100 scale (or similar) as well as plans of the current buildings. A hard copy of the archival record for each building is to be provided to Canada Bay Council (for Council's Local Studies Library). The archival records are to include an electronic copy of the document on a good quality memory stick (for Council's electronic data base.)

Impact of new structures

The proposed new large hospital building will adversely affect the setting of the original hospital building, in particular the historic multi-ward block. It is unfortunate that the proposal was not designed to respect the original design rationale of separate buildings related through their landscape setting and formal arrangement.

Thank you for the opportunity to comment on the development application for the Stage 1 redevelopment of the Concord Repatriation General Hospital (SSD 9036), and we trust the above information is of assistance.

If you require any further clarification on the matters raised please contact Council's Manager Statutory Planning, Narelle Butler on 9911 6440 or Co-ordinator Statutory Planning, Shannon Anderson on 9911-6441.

Yours faithfully,



Peter Gainsford
General Manager