Response to Submissions and Preferred Project Report

Nepean Hospital - Derby Street, Kingswood

Stage 3A - Integrated Mental Health Unit Development

Submitted to
Department of Planning
On Behalf of NSW Health Infrastructure

November 2010 ■ 10486

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This report has been prepared by: Robert Stark

Signature  Date 29/11/10

This report has been reviewed by: Oliver Klein

Signature  Date 29/11/10

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Attachments

1.0 Introduction

An Environmental Assessment Report (EAR) for a Project Application for the construction of an Integrated Mental Health Unit (IMHU) at the Nepean Hospital at the corner of Parker and Derby Streets, Kingswood, was publicly exhibited for a period of 33 days between 22 September 2010 and 25 October 2010.

In total three agency submissions were received in response to the public exhibition of the Project Application, in addition to a response from the Department of Planning. The key issue identified in the submissions made was the impact of the loss of car parking on the hospital campus as a result of the development on the surrounding street network and residents.

The proponent (NSW Health Infrastructure) and its specialist consultant team have reviewed and considered the Department's comments and the public submissions and, in accordance with clause 75H(6) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), has responded to the issues raised. This Preferred Project Report (PPR) sets out the proponent's response to the issues raised, details the final project including a number of revisions to the Project Application and a revised Statement of Commitments for which development approval is now sought.

This report should be read in conjunction with the Environmental Assessment Report (EAR) dated September 2010 and forms part of the Project Application.

2.0 Key issues and Proponents Response

The following section provides a detailed response to the key issue raised by the Department of Planning following a detailed review of the submissions. **Attachment 1** provides a response to all the issues raised during the public exhibition period.

2.1 Loss of Parking

Issue

The Department of Planning requested further information regarding how the proposal will address the loss of car parking on-campus and manage or mitigate impacts to the local street network and residents.

Proponent's Response

The proposed development results in a net reduction of 84 car parking spaces. In line with Government policy on modal shift and the Premier's Council for Active Living, consideration has been given to reducing the reliance on driving to the sire by including:

- bicycle racks and change facilities;
- improvements to bus stop;
- improvements to wayfinding and signage;
- introduction of a Transport Access Guide;
- the preparation of a Workplace Travel Plan supporting walking, cycling, public transport and car sharing and providing a one-off issue of a free weekly train/bus pass.

The Traffic and Parking Impact Assessment prepared by TEF Consulting and submitted with the Environmental Assessment Report noted that the periods of peak parking demand are outside the periods of peak parking demand generated by local residents. Therefore, there will be little or no direct effect on resident parking.

It should also be noted that parking demand was assessed on the worst case scenario, and it is anticipated that the implementation of modal shift policies and the introduction of cyclist facilities within the proposed development would improve the current position. Further discussion regarding the proposed cyclist facilities is provided in Section 3.0.

In any case, extensive investigations have been undertaken in relation to the future provision of car parking across the entire Nepean Hospital campus. These investigations have determined that a new multi-deck car park will be built on the campus at the corner of Somerset and Derby Streets. The new car park will contribute to the existing provision of 1,274 parking spaces on the campus, which currently provides 495 spaces more than required by Council's DCP.

However, the timing of the delivery of the car park is dependent on the results of an inquiry by NSW Health into procurement and funding models for car parking at all major metropolitan hospitals. The results of this work will inform the decision by NSW Health as to when the multi-deck car park will be constructed.

Most importantly, there is a commitment to deliver this outcome for the hospital and surrounding community. A letter detailing the above is provided at **Attachment 2**, and the revised Statement of Commitments also reflects this strategy.

2.2 Minor Issues

Draft Conditions of Consent

The draft conditions of consent prepared by Penrith City Council refer to construction certificates, occupation certificates and the like. As the proposed development is 'Crown building work', these references should be amended to reflect the correct terminology and processes available to Crown development under clause 109R of the *Environmental Planning and Assessment Act 1979*.

Cyclist Facilities

The Sydney Regional Development Advisory Committee requested additional details regarding the provision of facilities for cyclists. The Preferred Project architectural drawings show that two showers are provided for cyclists with the staff amenities area on Level 3 (refer **Appendix 3**). Furthermore, stanchions for locking bicycles and an an awning over the bicycle parking area have been provided for security and weather protection.

These cyclist facilities have been designed in accordance with the relevant provisions of the NSW Planning Guidelines for Walking and Cycling and will encourage staff and visitors to cycle to the IMHU.

Servicing

Sydney Water advised that the proposed development is able to be serviced by the existing drinking water and waste water mains in the vicinity.

Electrical servicing is to be provided by the Nepean Campus' private high voltage network, and therefore there is no requirement for any approval or notification by Integral Energy. Accordingly, any condition (such as that proposed by Penrith City Council) would be superfluous.

3.0 Preferred Project

In accordance with its commitment to address the concerns of the Department of Planning, Penrith City Council and the public, NSW Health Infrastructure has modified its proposal.

A complete set of architectural drawings of the revised development has been prepared by Woods Bagot and is located at **Attachment 3**. A number of statements have been provided by the consultant team to confirm that the revised development remains acceptable in terms of compliance with the relevant codes and standards, as follows:

- Building Code of Australia (refer **Attachment 4**);
- Stormwater (refer **Attachment 5**);
- Ecologically Sustainable Development (refer **Attachment 6**);
- Acoustic (refer **Attachment 7**); and
- Traffic (refer **Attachment 8**).

3.1 Description of Development Proposal

This Project Application seeks approval for:

- The construction of a two to three storey building to accommodate the IMHU. The building will have a gross floor area (GFA) of 5,611m^2;
- Mental health accommodation units located on the first and second levels of the proposed building include:
  - 20 high dependency beds;
  - 24 acute treatment beds; and
  - 20 special mental health service beds for older people;
- Offices for mental health professionals and administration staff on Level 3 of the proposed building;
- Lounge areas and informal areas, dining areas, education/workshop areas, family meeting rooms, a gymnasium and multimedia entertainment and education rooms;
- Internal landscaped courtyards accessible from within the building;
- Ancillary plant and infrastructure; and
- Relocation of an existing Reconciliation and Memorial Garden and commemorative plaque from the north eastern portion of the site.

3.2 Key Changes

The main design changes to the building since exhibition are detailed below. A discussion of the change and justification is provided where relevant.

Roof Design

The roof design has been changed from a concrete roof to a metal roof. The main reason for this was the client and design team was of the view that the rooftop plant rooms, which were visibly prominent from the internal courtyards, would have had a detrimental effect on the patient environment, that is, the amenity of those using the courtyards.

The proposed metal roof design integrates the plant rooms into the overall roof form, minimising their visual impact. The design team is of the view that the integrated metal roof design offers a better architectural design as well as a cost effective solution. The new roof design has additional building height on the east and west wings to accommodate head room for the relocated plant areas within the pitched roofs.

Wall Colour

The coloured interior pre-cast walls have been changed from a red pigment to light green pigment, inducing a more calming environment for the patient courtyards.

Entry Screen

The south-west exterior entry screen has changed from a concrete screen to a suspended metal screen, addressing client concerns regarding this element being climbable.

User Requirements

Various floor plans and window locations have been adjusted to meet user requirements following on from internal user group liaison and discussions. Exterior metal window screens have changed colour from white to a copper colour to make them less visually prominent from within the pre-cast concrete wall panels.

Courtyard Walls

Interior courtyard walls have been lowered and perforated metal mesh added to the top of the walls to allow more light into the internal courtyards. Again, this allow from improved internal and patient amenity.

Courtyard Window Alignment

Some bedroom windows facing the internal courtyard have been reconfigured so that they are flush (rather than splayed) to the facade of the building.

Traffic Flow

The section of the internal circulation road along the frontage of the proposed IMHU building is to be made one way in the north-eastern direction. The road will also be narrower, providing one traffic lane rather than the previous two lanes required for two directional flow. Further information relating to this change, including a description of the impacts on the surrounding traffic network and pedestrian safety, is provided in **Attachment 7**.

3.3 Impact of Changes

These changes have now also better addressed Council's initial comments on the scheme including:

> *Any proposed roof plant, equipment and/or machinery should be located within the roof structure of the proposed building to avoid the unsightly presentation typically associated with these structures.*

Further, Council in its formal submission has similarly sought a draft condition as follows:

> *Any roof plant or equipment is to be positioned so that it cannot be viewed from the street, or alternatively screening measures are to be implemented.*

The proposed changes to the building's rooftop clearly have now suitably addressed Council's concerns, and have also concurrently resulted in an improved relationship not only to the streetscape but the building's own internal courtyards.

Overall the impact of the change is beneficial to the function and appearance of the building. The additional height ranging between +4.726m to +4.918m (now at a range of RL 71.526 to 71.718 compared to the originally proposed RL 66.800) does allow for concealed plant and an architectural treatment and finish to the top of the building, whereas the exhibited scheme lacked this and presented a near flat roof with plant above.

The key consideration of the additional height would be overshadowing to the properties to the south of Derby Street. The exhibited scheme's March, June, September and December shadow analysis showed that there was no affect upon neighbouring properties and that all solar access requirements to living rooms between 9am and 3pm could be achieved, where those properties on Derby Street are residential in use.

The revised scheme's shadow analysis demonstrates that there is similarly no effect upon residential properties in March, September and December. Indeed the shadows are little changed despite the height increase. In June, the 9am shadow now hits two properties, one of which is a medical consulting room. By noon, these shadows have receded and affect only the road carriageway of Derby Street. Accordingly, the revised scheme does not adversely impact upon neighbouring residences as a further minimum of 3 hours of solar access is achievable as presently enjoyed by the two affected premises.

4.0 Final Statement of Commitments

In accordance with Part 3A of the *Environmental Planning and Assessment Act 1979*, the following are the commitments made by NSW Health Infrastructure to manage and minimise potential impacts arising from the proposal. These commitments replace the draft commitments included with the EAR.

4.1 General Works

Notwithstanding any other commitment (condition of approval), the approval for the Project Application permits separate certification in accordance with section 109R of the *Environmental Planning and Assessment Act 1979* to be issued for the development approved by the consent in stages, provided that all commitments (conditions of consent) relevant to the development incorporated within each stage have been complied with prior to the issue of the certification for that stage.

4.2 Future Multi-Deck Car Park

A new multi-deck car park will be built at Nepean Hospital Campus to allow for existing and future hospital services. The corner of Somerset and Derby Streets has been identified as the preferred location for the car park. The timing for the delivery of the multi-deck car park is subject to the outcomes of NSW Health's investigation into alternative procurement and funding models of car parking at major metropolitan hospitals.

4.3 Construction Management

The following plans will be implemented during the construction phase of the development:

- Construction Environmental Management Plan (CEMP);
- Construction Traffic Management Plan;
- Waste Management Plan;
- Sediment and Erosion Control Plan; and
- Construction noise and vibration management control plan.

Trees to be retained in proximity to the area of works will be appropriately protected during construction. Measures will be included in the CEMP to prevent impacts on flora, such as the introduction of weeds from machinery brought on to the site, or the creation of an environment where weeds may flourish.

Soil Salinity and Erodible Soils

The following recommendations in the Geotechnical Report at **Appendix Q** will be implemented to ensure that soil and subsurface conditions do not result in structural or environmental impacts:

- Soil salinity will be taken into consideration in the design and construction of the development, particularly with regard to deeper built structures;
- A Salinity and Sodic Soils Management Plan will be prepared and implemented in the proposed construction to ensure no structural or environmental impacts result from the Project Application development; and
- Stormwater management and erosion and sediment control measures implemented on the site will ensure that highly erodible soils are adequately managed.

4.4 Flora and Fauna

A stand of *Eucalyptus moluccana* (Grey Box) and *Corymbia maculata* (Spotted Gum) adjacent to the site that are characteristic species of the Cumberland Plain Woodland vegetation will be retained and assessed by arborists prior to construction.

4.5 Geotechnical Conditions

Recommendations in the Geotechnical Report at **Appendix Q** for construction methods appropriate to the geotechnical conditions on the site will be implemented.

4.6 Construction Noise

- Recommendations set out in the Acoustic Report at **Appendix N** for the management of noise levels resulting from the proposed construction works will be implemented.
- Construction working hours will be restricted to those set out in the Interim Construction Noise Guideline published by the Department of Environment, Climate Change and Water (DECCW) which are:
  - Monday to Friday 7 am to 6 pm; and
  - Saturday 8 am to 1 pm.
- Recommendations in the Acoustic Report at **Appendix N** for the management of noise levels resulting from the proposed operation of the development will also be implemented. These include selection of quiet plant and installation of noise enclosures and barriers as required.

4.7 Environmentally Sustainable Development

Technical measures set out in the Environmental Concept Design Report at **Appendix G** will be implemented in the construction and operation of the development. Accordingly, the development will be capable of achieving a 4 Star Green Star Health Care rating.

4.8 Workplace Travel

- A workplace travel plan is to be prepared by suitably experienced consultants prior to occupation for future staff supporting walking, cycling, public transport and car sharing prepared in accordance with the *Premier's Council for Active Living* guidance to support a reduced parking component.
- Transport access guides are to be prepared prior to operation and placed prominently within the development to guide future users of the site.

4.9 Stormwater Management

Volumes of rainwater runoff from the development that flow into Council infrastructure will not exceed pre-development flows.

4.10 Site Remediation

Fill material identified by the Stage 1 and 2 Environmental Assessment at **Appendix G** as having the potential to contain asbestos will be inspected by an appropriately licensed contractor to determine the extent to which it may be impacted by asbestos prior to removal from the site. Any material identified as being impacted by asbestos will be removed and disposed of by an appropriately licensed contractor and in accordance with WorkCover requirements.

4.11 Utilities

- Liaison will continue and necessary approvals obtained from all relevant service providers in regard to the provision of utility services to the site;
- Water for use by NSW Fire Brigade, should it be required, will be provided in accordance with the relevant BCA standards.
- To reduce potable water demand, an on-site potable water storage tank with a capacity of 10,000 litres will be installed on the site.
- A rainwater retention tank to provide water for toilet flushing and irrigation will also be installed on the site with a capacity of 50m^3.
- A 1.5MVA electricity substation will be installed on the site to meet additional demand for electricity resulting from the proposal.

4.12 Consultation

This Project Application commits to ongoing consultation throughout the process as considered relevant and that builds upon the findings and recommendations of the Project Application and supporting appendices.

A Stakeholder Consultation Strategy will be prepared and implemented throughout the detailed design and construction stage.

4.13 Aboriginal Heritage

In the event that any historical or Aboriginal relics are uncovered during excavations, all excavation and disturbance to the area will stop immediately and the Department of Environment and Climate Change will be informed in accordance with the *National Parks and Wildlife Act 1974*.

4.14 BCA and Accessibility

BCA

Development will be compliant with the BCA 2010 and in accordance with the recommendations outlined within the BCA Report at **Appendix R**.

Accessibility

Development will comply with the recommendations of the Access Report by Accessibility Solutions at **Appendix S** and will comply with the relevant provisions of the DDA and applicable Australian Standards.

Vehicular Access

- Ingress and egress of all trucks must be in a forward direction with ample internal storage provided for any queuing and loading activities.
- All car parking areas must be designed to comply with Australian Standard 2890.1-2004.

Fire Safety

Constructing of the building will be in accordance with the BCA, and where required to developing alternative solutions which comply with the relevant performance requirements of the BCA 2010.

Energy Efficiency

Development will at a minimum comply with Part J of the BCA 2010.

4.15 Operational Waste Management

Waste management policies set out in the SWAHS Waste Management Policy Manual (**Appendix O**) will be implemented on the site.

5.0 Conclusion

In terms of the issues raised during the public exhibition process, this Report in conjunction with the Environmental Assessment Report has demonstrated that the Project Application will have minimal adverse environmental effects.

The site is of a sufficient size to accommodate the proposed facility and does not immediately adjoin any residential properties. As demonstrated in this report, the building will not result in any adverse impacts to residential amenity and is consistent with the desired future character of the street in which it is located.

In light of the benefits of the proposed development and the absence of any adverse environmental impacts, we have no hesitation in recommending this Project Application be approved.