



Ref: D13/25180, T6-13-248, LA 2765
KJA:JH

10 September 2013

Ms Heather Warton
Director, Industry, Social Projects and Key Sites
GPO Box 39
SYDNEY NSW 2001

Dear Ms Warton

DEVELOPMENT APPLICATION T6-13-248
LOT 2 SEC 20A DP759080, 119 RIVER STREET WEST KEMPSEY
KEMPSEY HOSPITAL REDEVELOPMENT STAGE 1

Thank you for the opportunity to comment of the redevelopment of the Kempsey Hospital.
Please find below Council's comments on the EIS:

SUBJECT	COMMENTS
2.8 and 4.14 FLOODING	<p>The flood information contained in this section is incorrect. The following data needs to be incorporated into the EIS: -</p> <p><i>The 1% AEP flood level ranges from RL 12.24m AHD in the Macleay River opposite Polwood Street to RL 11.48m AHD opposite Broughton Street.</i></p> <p><i>The Probable Maximum Flood level ranges from RL 20.81m AHD in the Macleay River opposite Polwood Street to RL 20.1m AHD opposite Broughton Street.</i></p> <p><i>During the PMF flood event all road access to the hospital will be cut preventing any sort of vehicle movements to or from the Kempsey Hospital. The preferred road access North Street to River Street will be cut during this event by flood waters at depth of 3.3m.</i></p> <p><i>The EIS needs to make reference to the NSW State Emergency Services document <u>Kempsey Shire Local Flood Plan</u> and the <u>Kempsey Local Disaster Plan</u>.</i></p> <p>Restrictions on critical emergency response</p>



SUBJECT	COMMENTS
	and recovery facilities and Infrastructure such as this hospital has not been addressed for flooding above the 1% AEP flood event.
2.12.4 Pedestrian	Council has in place a <i>Pedestrian Access and Mobility Plan</i> for Kempsey. The figure at Appendix A shows the Pedestrian Route Network for Kempsey. This plan should be referred to.
3.7 Access	<p>It is proposed to link River Street Pedestrian path with the existing internal pedestrian paths to the new Polwood Street entrance.</p> <p>The existing <i>pedestrian</i> path is in River Street and there are is no pedestrian path from the intersection of Polwood and River Streets along Polwood Street road reserve or any other interconnections at Tozer Street. The closet other pedestrian paths is located on the eastern corner of Tozer and Broughton Streets.</p>
4.13 Contributions	<p>1. <u>Section 94(Ministers Discretion)</u></p> <p>If Council is to seek to collect contribution for the Local Traffic Plan then an argument needs to be put to the Minister.</p> <p>The following preliminary comment is provided: -</p> <ul style="list-style-type: none"> • Development claiming exemption for local roads plan on the basis "Given that <i>Health Infrastructure NSW</i> will carry out local road improvements". • There is no indication in the EIS or associated documents that there will be improvements to Council roads undertaken as part of the proposed redevelopment. At recent meetings there was a clear intention not to upgrade any part of Polwood Street. • Section 4.6.4 of the EIS states the redevelopment will generate an



SUBJECT	COMMENTS
	<p>additional 50 vehicles per hour at the peak and a total of 250-300 vehicles per day.</p> <ul style="list-style-type: none">The additional traffic generated by the redevelopment will not require by itself intersection upgrading, cycle paths, or the like on the associated Council roads. However they will add traffic and have a cumulative impact which will generate the need for upgrades. Therefore a contribution needs to be paid now to go toward future upgrading of the surrounding public roads. <p>2. <u>S64 Water and Sewer</u></p> <ul style="list-style-type: none">The only indication of the type and size of the redevelopment is contained in the various supplementary reports appended to the EIS.The Water Directorate provides standard ET figures for hospitals at the current rate of for water 0.9et/bed and sewer 1.4et/bed.There will be an additional 13 beds but more importantly a total additional gross floor area of 3700 m².In any negotiations with Council and certainly in this part of the EIS the Crown needs to identify the use to which the additional gross floor area is to be put in the context of either replacing and or expansion of existing services.
4.15.2 Stormwater Management Strategy	<ul style="list-style-type: none">There is no reference to the Enstruct's <i>Stormwater Management Plan</i> (SMP) at appendix K2;There is no mention in either the SMP or the EIS on water quality targets and means of achieving them, only that a gross pollutant capture system will be installed prior to discharge to the Macleay River which does not address water quality discharge from the site as a whole;There is no discussion anywhere in the EIS



SUBJECT	COMMENTS
	<p>or supporting documentation on the location of the proposed new piped stormwater drain outlet at the Macleay River and the method to be deployed to reduce the outlet velocity in the pipe to prevent scour at the river bank;</p> <ul style="list-style-type: none">• There are no details on the effect on the existing environment (flora and fauna habitat) at the proposed pipe discharge point at the Macleay River;

If you have any questions please do not hesitate to contact me of 65663200.

Yours faithfully

Kate Alberry
MANAGER DEVELOPMENT ASSESSMENT
SUSTAINABLE ENVIRONMENT