

PW:IMS No. 2848559  
Peter Wood  
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18 January 2011

Mr Daniel Cavallo  
A/Director Government Land and Social Projects  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

**Attention: Ben Eveleigh**

Dear Ben,

**Proposed Nepean Health Precinct: Concept Plan and Stage 1 Project Application (MP09\_0220,917)**

Thankyou for your referral of the above applications, the opportunity to comment on the Environmental Assessment and I apologise for the delay in making this submission. This site and proposal represent a significant opportunity for Penrith City to provide for appropriate professional medical consulting room premises, short stay accommodation and support services in close proximity to the established medical precinct of Nepean Public and Private Hospitals and Council supports the proposal in principle. It is submitted however that a number of matters relating to land use, urban design and transport must be adequately addressed by an amended proposal in order for it to be approved by the Department and these are outlined as follows:

**Land Use**

The land is currently zoned 2(d) Residential (Medium Density) under Penrith Local Environmental Plan 1998 – Urban Land and any reconsideration of this zoning will be under Stage 2 of Council's new Standard LEP process which is not likely to be exhibited until late 2011.

This proposal therefore effectively represents a "rezoning" from a residential to a predominantly commercial land use. Whilst Council supports the proposed professional consulting room, conference and short stay accommodation components on the basis that they are related to medical or health care services and there is a nexus with the hospital precinct, concern is raised with the potential for the proposal to provide for uses beyond this as follows:

- The extent of retail floor space proposed indicates it will serve customers beyond this proposal and that generated by the adjoining hospitals. In this regard the EIA assumes (p22) that, “any retail within the Hospital Precinct is part of the overall Kingswood centre.” It is true that Penrith City Centres Interim Hierarchy Strategy, 2007 identifies the land as being part of the specialised centre given the hospital uses, but this does not translate into a retail floorspace allocation right at this location which, under this proposal, is more than half of that allocated for the Kingswood centre in total. This site is not an extension to the existing Kingswood Small Village Centre and the assessed impact on this centre and other commercial centres as outlined in Table 10 of the EIA is not acceptable given the land is not zoned for this purpose and there is an abundance of supply of land zoned for retail floor space within existing centres. Only retail floor space ancillary to the proposed medical and short stay accommodation on site and the adjoining hospital uses is appropriate at this location;
- Any commercial floorspace at this location must only be used for medical/health care related professional consulting rooms and related conference facilities. Council is concerned that other commercial uses may occupy the site given the substantial commercial floorspace proposed which would have unacceptable impacts on the existing oversupply of commercially zoned land and floorspace within the Penrith City and other commercial centres;
- The scale of the residential apartment component of the development nominated for Stage 2 is inappropriate given the existing zoning of this and adjoining lands. Any consideration of Stage 2 Residential Apartment buildings for long term residents should respond to the sites context in accordance with SEPP 65 and the Residential Flat Code. Council is only supportive of short stay accommodation at a scale beyond this. The issue of scale is further addressed below under urban design.

### Urban Design

Generally the design application has incorporated solutions to many issues raised by Council (at its' Urban Design Review Panel meeting of the 13.01.2009) and produced a highly urban contemporary proposal for this site. Central to the recommendations was incorporating the corner site (stage 02) into the larger master plan in order to achieve a broader more comprehensive gateway solution.

Significant concerns which remain however in relation to the concept plans and the detailed DA include:

- *The effectiveness of the pedestrian network, both within the subject site and leading to the site;*
- *Landscaping of public frontages and publicly-accessible areas;*
- *Built form and scale in relation to pedestrian areas and the surrounding urban context.*

In relation to the pedestrian network, concerns relate to:

- Poor integration of outdoor areas with two levels of indoor arcades

- Unsatisfactory connection of the site's pedestrian network to the hospital campus which has a centre of activity that is regrettably remote from the proposed development
- Poor connection to the Great Western Highway via three or four separate points of entry which neither contribute to a legible pedestrian network, nor accentuate the form or direction of pathways, nor contain or protect that network from the harsh road environment
- Poor amenity of the proposed pedestrian plaza which should be a focal point for pedestrian activity, but which would be compromised by a narrow proportion that is hemmed between two relatively tall buildings. Those buildings would comprehensively overshadow the plaza during midwinter, as well as providing over-scaled backdrops and channelling cold winter winds through this strategically-important space
- Unsatisfactory integration of retail areas and the pedestrian network with elements that are contrary to accepted retail design practice such as abrupt turns, multiple street entrances, hidden corners, and outdoor escalators which are exposed to wet-weather
- Poor consideration of pedestrian movements across Barber Avenue to the proposed plaza, primarily in relation to a pedestrian crossing point which competes with slip-lanes, and an overall street frontage which is dominated unnecessarily by the needs of vehicles.

Landscaping in public areas would be compromised by insufficient of deep soil:

- In relation to the site's urban context and its location facing a four-way arterial intersection, the concept plans fail to provide generous deep soil setbacks. Deep soil frontages would accommodate boulevard plantings with canopy trees that have proven benefits for such locations by enhancing the amenity of developments together with the attractiveness of their setting
- Facing the Great Western Highway, construction of basements within two metres of the site boundary and upper storeys which are setback 4m would not accommodate effective canopy plantings
- A similar situation applies along Parker Street where the narrow road verge must accommodate a regional cycleway as well as a pedestrian footpath, and where proposed basement setbacks would be similar to those facing the Highway
- Plaza landscaping, which sits immediately above basement carparking, is unlikely to be viable.

In relation to built form, dimensions and articulation of prominent facades contribute to perception of an over-scaled development:

- Concept plans reveal three separate buildings, of which two have very wide street elevations that display inadequate articulation

- The mixed use commercial-retail building in stage one employs simple modern forms and facade details which are not unduly offensive, but which nonetheless do not moderate scale as effectively as the “superseded” development proposal which is demonstrated by 3-d imagery (note that some elements of architectural plans, sections and elevations are not consistent with those 3-d images which relate to a previous scheme)
- Along the eastern side of the proposed plaza, although the proposed medical hotel building displays a facade which is elaborately-articulated, it nonetheless presents as a very long structure which would overwhelm this pedestrian space with an uncomplimentary backdrop
- In relation to scale, bulk and general design character, the most-serious deficiencies relate to the Parker Street building which will form the second stage development application. The Height of the Parker Street building is substantial, and is not moderated by the proposed building forms, or by general modelling and design of facades (note that deficiencies in relation to form are significant because concept approval is sought for this building)
- Scale of the Parker Street building is accentuated by prominent blank facades which would face the major intersection, by the long facade which would incorporate an unrelieved linear alignment, and by the under-cut design of the facade with almost ten storeys that would overhang the street-level facade.

In terms of site planning, the proposed concept plans demonstrate inadequate regard for landscape context or pedestrian amenity. That is evident in the proximity of proposed building forms to street boundaries as well as to one another, together with the unrelieved height and unbroken lengths of buildings facing prominent street frontages.

In combination, these factors produce the perception of an overdevelopment that pays limited regard for the site’s circumstances, and which fails to consider the dynamics of pedestrian activity within a mixed use development.

The current design concept and stage one DA demonstrate an unsatisfactory standard of urban design quality. Consequently, strategic social and economic potentials of this major mixed-use development are unlikely to be achieved. Due to the fundamental nature of urban design issues which affect this proposal, simple design amendments would not be effective.

The outstanding points of divergence which could be amended are summarised as:

1. Excessive overall height
2. Absence of additional public pedestrian pathways/links to the eastern section of Stage 01
3. Lack of any provision for cyclists using the Great Western Highway (GWH) as a major dedicated cycle strategic east west route

The following recommendations are made to respond to these matters:

- *that the height of the corner “gateway” site (Stage 02) be significantly reduced and that the remainder within Stage 01 be 6 storeys max above natural terrain level.* The rationale is that the proposed heights i.e. 12 storeys for the corner site Stage 02 and 8 storeys for the Stage 01, equates with those heights envisaged for the regional city centre of Penrith and the Kingswood town centre. Those maximum storey heights being 15 and 9 storeys respectively. This “gateway site” should be in terms of its urban form, sub dominant to the central urban settings of each city and local town centre rather than competing with it;
- *A further public pedestrian path be established* connecting Barber Ave and GWH along the eastern section of the site connecting through to Nepean Private Specialist Centre;
- *Provision for cyclists using GWH needs to be considered.* It is recommended that provision for a dedicated cycleway be incorporated into the GWH street address. The details of this main east-west connecting route needs to be considered as part of a strategic bicycle network. This may be either a shared pedestrian pathway or a purely dedicated cycle path.

### **Traffic & Parking**


- The Barber Avenue access only would appear to be inadequate as a means of facilitating all traffic movements to and from the site. An internal link to Somerset Street or similar would be favoured as a means to adequately disperse traffic movements. This would negate the need for an access to the GWH and avoid potential weaving conflicts for north travelling vehicles. The proponents are encouraged to work with both adjoining landowners in pursuing a suitable continuation of Barber Avenue to provide for through movements. If the Somerset St option is not achievable, a continuation of the street to the Great Western Highway between the Public Hospital land and Private Hospital/Subject site should be encouraged to provide for suitable future access between the two precincts.
- Location of pedestrian desire lines, particularly in relation to Parker Street, need to be reanalysed due to the compounded effect of reduced car parking, medium density development and heavy vehicle flows on surrounding streets. Pedestrian fencing on the median island (Parker Street) and kerbside should be investigated. Dedicated pedestrian cyclist facilities (footpath widening) should be provided to encourage active transport
- The proposed Taxi Rank in Barber Avenue is not supported as the internal road configuration must cater for all setting down and picking up movements
- It would appear that the supermarket operation would require ARV movements. As such all loading dock and access movements must cater to the largest vehicle accessing the site
- The reduction in parking is not supported due to the high competing demands of the hospital and adjacent land uses. It is envisaged that even a boom gate operated car park would lend itself to use by hospital visitors

- Trip generation discounts (some 25%) are considered excessive and it is envisaged that the majority of users will use motor vehicles. Whilst it is acknowledged that some complementary land uses exist, the trip generation discount of 25% is excessive and a more modest discount should be reapplied to the surrounding road network. Furthermore the modelling has not applied background traffic growth, forecast year data nor factored in current expansions taking place at the public hospital. This is critical in ascertaining a realistic traffic generation representation
- The proposed changes to the GWH and Parker intersection, namely the southern approach, will have detrimental impact on the left turning capacity at this intersection (Parker into GWH). Furthermore whilst the additional through lane provides increased capacity, it is directed toward a parking lane and Barker Avenue and it is envisaged weaving movements will be high at this location
- The queuing implications in Barber Avenue, spilling into Parker Street if the car park were full should be assessed.

Given the extent of issues raised under the above headings it is evident that the proposal currently represents an overdevelopment of the site which is a function of both the nature and extent of land uses proposed. Council is more than willing however to continue discussions with both the Department and the proponent with a view to achieving a positive outcome for the site.

We trust that the Department will pay due regard to Council's submission in its' assessment of the application. Please contact me if you have any questions further to the above.

Yours faithfully,



Peter Wood

**Development Assessment Co-ordinator**  
**Penrith City Council**