
SOMERSET AND RODGERS STREET KINGSWOOD LAND: PEER REVIEW OF OPEN SPACE ASSESSMENT

FINAL REPORT

28 JANUARY 2021



PENRITH CITY COUNCIL

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1 INTRODUCTION

1.1 Background to this report

Penrith City Council commissioned the Nepean Hospital Precinct Open Space Analysis (Urbis, 2013) for reason(s) not specified in the report. However it is understood that Council sought the open space analysis to inform general property development proposals in the vicinity of the hospital.

At that time the open space at the corner of Somerset Street and Rodgers Street in Kingswood (the subject land) was being used for a temporary carpark for Nepean Private Hospital. Council identified the subject land as being surplus to Council and community needs.

Penrith City Council resolved on 13 August 2018 to commence a Gateway process to rezone the land, with the Gateway Determination for the Planning Proposal received on 16 October 2018. Council is preparing a Planning Proposal to reclassify the Somerset Street and Rodgers Street land from community land to operational land and to rezone from RE1 Public Recreation to B4 Mixed Use for the land to be used for a carpark.

Public exhibition of the Planning Proposal occurred between 18 March and 16 April 2019. The public hearing for the Planning Proposal was held on 4 May 2019.

In 2020 the NSW government issued draft open space for recreation planning guidelines for local Councils (NSW Government Architect, 2020) which updated the draft recreation and open space guidelines issued by the NSW Department of Planning in 2010. Council also released the Penrith Open Space and Recreation Strategy (Penrith City Council, 2020) which updated the Penrith Open Space Action Plan (Penrith City Council, 2007).

Parkland Planners was commissioned in January 2021 to peer review the Nepean Hospital Precinct Open Space Analysis 2013, and to advise Council about the open space information that should be provided in the Planning Proposal for reclassification and rezoning of the Somerset Street and Rodgers Street land. Council sought this report in response to feedback from the community and the Penrith Local Planning Panel regarding open space in the Nepean Hospital Precinct.

1.2 Council's requirements

Council's requirements for this peer review are:

We would like you to complete a peer review of the information provided in the Nepean Hospital open space analysis, confirming that the information provided enables adequate assessment of local open considerations.

Being mindful that planning for public open space has moved on from when the proposal was originally prepared, could you please also assess the public open space information provided in the Planning Proposal document in your assessment.

The end goal of both of these assessments is to determine whether the information provided is sufficient to enable an assessment of whether reclassification of the land is appropriate.

Could you please separately provide recommendations on any further items we should include in our assessment under existing planning practice.

1.3 Process of preparing this report

The process of preparing this report involved:

- ☐ reviewing and assessing background information
- ☐ inspecting public open space in the primary and wider study areas on Tuesday 5 January 2021
- ☐ preparing a draft report for Council review
- ☐ Council review
- ☐ preparing the final report.

1.4 Contents of this report

The following chapters in this report are:

- ☐ Section 2: peer review of the Nepean Hospital Precinct Open Space Analysis 2013 which supports the Planning Proposal
- ☐ Section 3: open space information in the draft Planning Proposal, and recommendations for information that should be included in the Planning Proposal
- ☐ Section 4: conclusion.

2 PEER REVIEW OF NEPEAN HOSPITAL PRECINCT OPEN SPACE ANALYSIS

2.1 Introduction

This section is a peer review of the Nepean Hospital Precinct Open Space Analysis (NHPOSA) (Urbis, 2013). Open space planning in NSW has evolved since 2013 and this is recognised in the peer review which assesses the Nepean Hospital Precinct Open Space Analysis in terms of what would have been thorough and reasonable in 2013.

This section is arranged according to the broad sections of an open space analysis report, which generally corresponds to the Table of Contents in the Nepean Hospital Precinct Open Space Analysis 2013.

2.2 Scope

The primary and wider study areas in the Nepean Hospital Precinct are shown using a map in Figure 1 in Section 1.2. The reasons why this study area was defined as in Figure 1 of the NHPOSA are not known.

2.3 Planning context / background review

All of the expected strategic plans at NSW, Sydney metropolitan, sub-regional and local scales as at 2013 were referred to in Section 2 and included in Appendix C 'Works Cited' of the NHPOSA. However, no relevant details of the NSW, metropolitan or sub-regional strategic plans were included in the report.

The strategic plans for the expansion of the Nepean Hospital Precinct were referred to in Section 1.3.1 of the NHPOSA but were not shown or described elsewhere in the report, so the hospital expansion plans are unclear. The hospital's expansion plans would have presumably shown the location, type and density of proposed development, so the impact of such development on public open space in the precinct could be considered and assessed.

The Kingswood Neighbourhood Renewal Program (date not provided) described in Section 2.2 of the NHPOSA appears to be the only source of resident input regarding open space in Kingswood, as community engagement about open space in the study area was not undertaken for the NHPOSA. Community engagement in 2013 would have been desirable to obtain input from residents about how they use open space and how they would like to use open space in their local area.

The value and benefits (particularly for health) of open space were briefly addressed in Section 2.3 of the NHPOSA, citing several references.

2.4 Supply

The current supply of open space in the Nepean Hospital Precinct was described and assessed in Section 3 of the NHPOSA through review of existing reports and site visits.

Section 3.2 of the NHPOSA established a hierarchy of open spaces in the study area. Maps of the hierarchy of open space referred to in Sections 2.4 and 3.2 of the NHPOSA as district and local open space would have assisted in identifying the open spaces in the study area matching the hierarchy of open spaces used in the assessment. The absence of this information impacted the outcome of the NHPOSA because it was not possible to test the assumptions, calculations and conclusions of the NHPOSA.

Existing open spaces in the Nepean Hospital Precinct were mapped in terms of location only, and this map was in an appendix at the back of the NHPOSA rather than in the supply section in the body of the report. It would have been instructive to have shown the location of sporting and informal open space, recreation facilities such as playgrounds, and physical linkages between the open spaces, in relation to residential areas, schools and community facilities, shopping centres, public and active transport routes, and the drainage system, in Section 3.2 of the NHPOSA.

Section 3.2.1 of the NHPOSA briefly describes and illustrates with a photograph each open space in the primary study area. Based on my site inspections and review of background information in January 2021 the summary of open space in the primary study area in Section 3.2.2 of the NHPOSA is reasonable, as follows:

3.2.2 SUMMARY OF OPEN SPACE IN PRIMARY STUDY AREA

There is currently six publically accessible, council owned open space assets in the primary study area, covering a total of 4.2ha (41,883msq).

The Wainwright Park, provides the only playground facility, and is located in close proximity to community buildings. Also the Red Cross Anniversary Park provides some amenity value with seating and artwork.

The open space areas within the primary study area are poor quality with limited recreation, play or amenity value. These areas are currently classified as Pocket Parks, they do not contain recreation or play facilities and currently primarily serve a drainage function or act as a pathway or thoroughfare between adjacent roads.

Many of these assets are restricted by the close proximity of residential dwellings or existing roads, the irregular layout of the sites, presence of mature trees, drainage channels and detention basins onsite. Therefore the potential for activation of these sites is limited. However there is the potential for embellishment of these assets to provide amenity value and encourage passive recreation. Embellishments of these areas could include provision of seating, play equipment, bubblers, shade pathways or children's cycleway and shade would substantially improve the amenity and quality of experience offered.

It is noted that there is no active open space in the primary study area of the Nepean Hospital Precinct, so access to active open space in the wider study area (Chapman Gardens and Doug Rennie Field) is important.

Section 3.2.3 of the NHPOSA similarly describes the open spaces in the wider study area.

An audit matrix of existing open space in the primary and wider study areas is in Appendix A of the NHPOSA.

It is noted from the site inspections that the proposed new playground at Peppermint Park and new paths through the park on Orth Street referred to in Section 2.4 of the NHPOSA have since been provided.

Open space on the UWS campus was acknowledged in Section 3.2.4 of the of the NHPOSA as contributing to the wider network of recreation opportunities available in the study area. However it was not stated in the report whether the general community are welcome to use the UWS football field, the extensive grassed area on the eastern side of the campus, the basketball and tennis courts, and/or the two hockey fields.

In Section 1.3.2.1 of the NHPOSA it was stated that an assessment of trends was conducted to compare supply of open space against best practice in Australia. The only comparison of open space in the study area with other areas was in relation to the high quality of open space in the Caddens release area being comparable to open space in the North Penrith (Landcom) and Jordan Springs (Lend Lease) release areas in Section 3.2.5.5 of the NHPOSA. There was no comparison of open space provision in the established area in the study area with other similar low density established areas on the urban fringe and in the vicinity of a hospital, such as Blacktown.

There was similarly no attempt to present a review of examples of best practice open space planning and park design in similar outer suburban redevelopment areas of the NHPOSA. It would have been instructive to compare open space in the study area with provision of open space in other similar socio-economic areas such as Blacktown, Liverpool, Campbelltown, and Hawkesbury. What types of open space and recreation opportunities work best in such areas?

Except for Jordan Springs Park, there was also no attempt to present a review of examples of good park design in similar outer suburban redevelopment areas. The Landcom Open Space Design Guidelines 2008 and Crime Prevention Through Environmental Design (CPTED) principles should have been referred to in terms of park design. What park and facility design works well in outer suburban areas? What park elements are popular? How can issues be better addressed by design, such as security of park thoroughfares at night?

Research into open space provision, needs and and design in comparable hospital precincts, such as Westmead, Blacktown, and Royal North Shore Hospitals, should have also been done.

Sections 3.1.1 and 3.2.5.5 of the NHPOSA correctly identified the constraints and open space quality issues of dual use drainage open space.

2.5 Demand

2.5.1 Stakeholder and community engagement

The outcomes of consultation undertaken by Urbis with key stakeholders (Landcom, UWS, Penrith Business Alliance) was identified in Section 1.3.2 of the NHPOSA, but were not outlined in the report. Engagement with key stakeholders in terms of supply of and demand for open space would have increased the robustness of the assessment and recommendations of the NHPOSA.

Nepean Hospital (public and private) management should have also been included in stakeholder engagement to determine needs and opportunities in the vicinity of the hospital for open space for workers, patients and visitors.

Urbis did not undertake any community engagement for the NHPOSA.

2.5.2 Demand for open space by residents

Demographics

An important link between socio-demographic characteristics and the implication for provision of open space in the study area was not made in Section 3.3 of the NHPOSA.

Census data from the Australian Bureau of Statistics was provided in tabular form in Table 2 in Section 3.3.1 of the NHPOSA for 2006 and 2011 for the study area, wider study area, Penrith LGA and Sydney in terms of population size, broad age groups, household size, household structure, dwelling structure, tenure, nationality, and level of education. The socio-demographic characteristics of gender, Aboriginal and Torres Strait Islanders, disability/need for assistance, median household income, vehicle ownership, occupation and industry (are health services well represented in occupations and industries of employment?) and SEIFA Index would have assisted an overall picture of the demographics of the study area from which assumptions about open space demand can be broadly made.

Social maps of the study area from <https://atlas.id.com.au/penrith> would have assisted understanding of where the people with identified socio-economic characteristics that differ greatly from Greater Sydney live in the study area. For example, the proportion of renters in the study area in 2011 was 59%, nearly double the proportion of renters in Sydney (32%). Where in the study area do concentrations of renters live, so attention can be paid to whether they have easy access to open space? Similarly the proportion of households comprising one parent families with children under 15 years was 22% in 2011 compared with 7% in Sydney. Where are the concentrations of single parent families in the study area? Do these area(s) have easily accessible open space with playgrounds and sporting facilities for children?

Mapping of high density dwellings in which residents have no private open space and so rely on public open space would also have assisted in identifying areas to pay particular attention to in terms of access to and provision of open space.

The link between forecast demographic changes and provision of open space was not made. Is more open space in the primary and wider study areas required to accommodate a presumably increasing population?

Open space use trends

There was no attempt in the NHPOSA to integrate sporting and informal recreation activity participation trends for NSW and Australia derived from data available in 2013 from the Australian Sports Commission's Exercise, Recreation and Sports Survey (ERASS), and the ABS Children's Participation in Sport and Leisure Activities survey.

Trends in participation in active and informal activities using open space could have also been derived from Penrith City Council open space planning documents.

Local trends in park use were not mentioned. Had there been an increase in walking for pleasure? Which playgrounds in the study area are popular, and why? Are park activities offered through the local community centre? Do people use the park near the local shops for picnics with take-away food? Do people use the playground near the local school before and after waiting for children to start and finish school? Is there a demand for use of sporting fields that exceeds the carrying capacity of the local sporting fields?

2.5.3 Demand for open space by the hospital community

There was no consideration of the needs for open space of the hospital community (staff, patients, families/friends and carers) for open space in the vicinity of the hospital. Onsite open space and outdoor seating areas at the hospital are limited.

Hospital staff, patients and friends/family have specific needs for on-site and nearby open space, including for post-surgery and rehabilitation exercise; somewhere outside to have breakfast, coffee, lunch, dinner; a warm, sunny place to sit in winter; and a place outside the hospital to have private conversations, and to make and receive uninterrupted phone calls.

2.5.4 Demand for open space by workers

There was no assessment of the open space needs of workers at the hospital, educational institutions (schools, TAFE, University) and businesses within the study area in the NHPOSA.

2.5.5 Demand for open space by students

There was no assessment of open space use or needs/demands for open space by school, TAFE or University students. What open space do they use and for what activities while they are studying in Kingswood? Do the schools need additional open space adjacent to their school grounds?

There is extensive open space on the eastern side of the Western Sydney University Campus. However the University should have been consulted about whether open space on campus is sufficient for their own needs, and if they would like to or need to use public open space in the area for certain activities.

2.6 Assessment

2.6.1 Total open space

Guidelines for open space provision

The NSW Recreation and Open Space Planning Guidelines for Local Government (Department of Planning, 2010) were the most recent open space planning guidelines widely used by Councils and consultants in NSW in 2013. The 2010 guidelines were draft, having not been adopted by the Minister. The 2010 guidelines followed the adopted NSW Outdoor Recreation and Open Space: Planning Guidelines for Local Government 1992 in moving away from a standards-based approach to a needs-based approach to open space provision.

The 2010 NSW open space planning guidelines were not referred to at all in the analysis, despite being referenced in Section 1.3.2.1 of the NHPOSA. The relevant aspect of the suggested approach to determining open space provision in the 2010 NSW open space planning guidelines is whether to adopt the default standard (Figure 1 below) or determine a locally appropriate standard (Figure 2 below), or a combination of the two.

Figure 1 Default standards for open space planning in NSW 2010

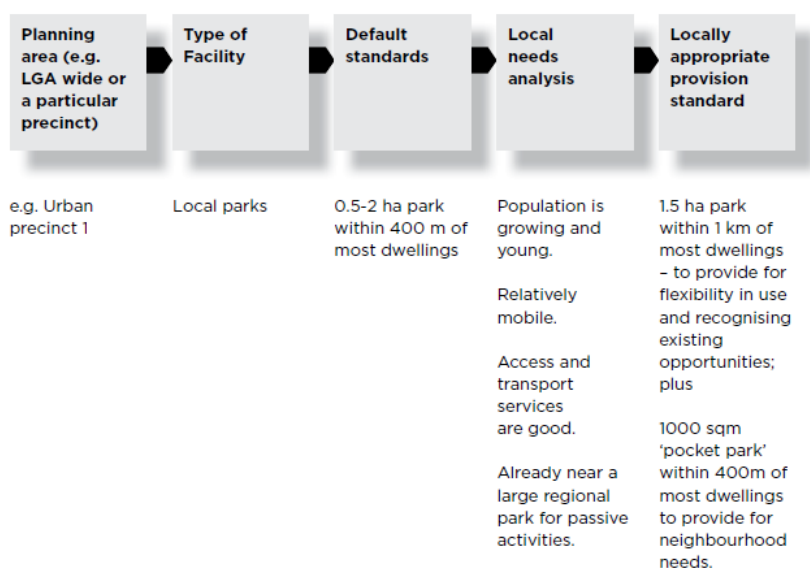
Table 4. Default standards for open space planning in NSW

	Hierarchy level	Size	Distance from most dwellings	Share of non-industrial land	Locally specific alternatives to meeting this standard
Parks	Local	0.5-2 ha	400m	2.6%	Civic spaces, plazas, pocket parks, portion of a regional park or quarantined area of a conservation or landscape area
	District	2-5 ha	2 km	0.6%	Beach and river foreshore areas, or quarantined area of a conservation or landscape area
Linear and Linkage	Local	up to 1 km	n/a	0.9%	Local primary schools, portion of a district park
	District	1-5 km	n/a	0.1%	Secondary schools, portion of a regional park
Sub-total (Parks/Linear and Linkage)				4.2%	
Outdoor sport	Local	5 ha	1 km	2.0%	Local primary schools, portion of a district park
	District	5-10 ha	2 km	2.6%	Secondary schools, portion of a regional park
Sub-total (Outdoor Sport)				4.6%	
Total (Local/District)				8.8% Say 9%	Could be reduced through shared areas using above alternatives
Parks	Regional	5+ ha	5-10 km	2.3%	
Linear and Linkage	Regional	5+ km	5-10 km	0.7%	
Outdoor Sport	Regional	10 +ha	5-10 km	2.9%	
Total (Regional)				5.9% Say 6%	
Grand Total				14.7% Say 15%	

Source: NSW Recreation and Open Space Planning Guidelines for Local Government (2010)

Figure 2 Locally appropriate open space provision standards

Figure 3. Deriving locally appropriate provision standards



Source: NSW Recreation and Open Space Planning Guidelines for Local Government (2010)

To apply the default and/or locally appropriate open space provision standards in the 2010 NSW open space guidelines, the size, hierarchy, and function of open spaces needs to be determined. In addition, distance radii (400 metres, 1 km, 2 km) should be shown on a map as shown in Figure 3 below to show the distribution of open spaces and to identify areas that don't have acceptable or reasonable access to open space within walking distance.

Figure 3 Application of default distances of parks and linear/linkage open space from dwellings

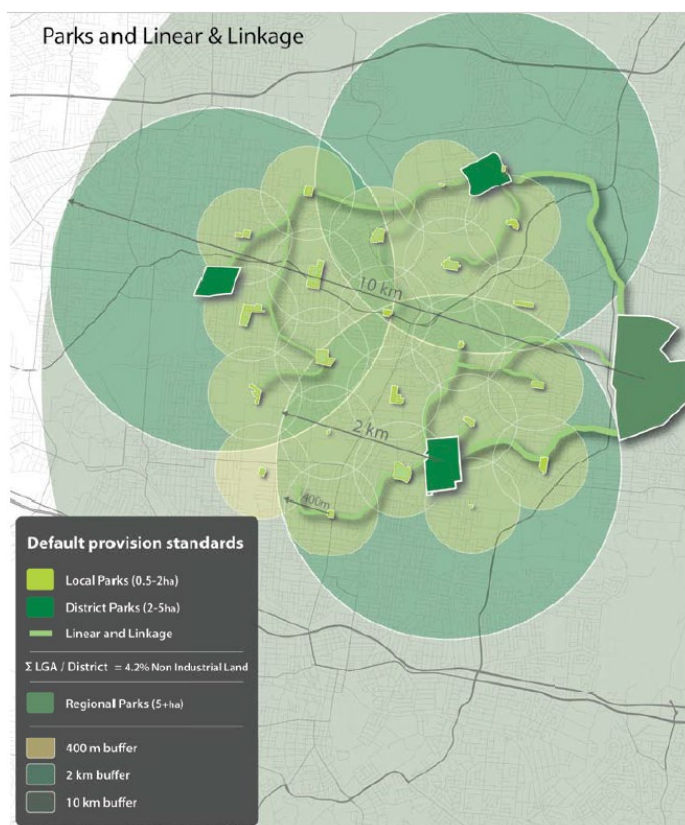


Figure 1. Idealised application of default open space provision standards: Parks and Linear and Linkage

Recreation and Open Space Planning Guidelines for Local Government

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Source: NSW Recreation and Open Space Planning Guidelines for Local Government (2010)

In section 1.3.2.1 of the NHPOSA it was stated that provision of open space in the study area was compared with Council and State provision rates. Open space provision in the study area was assessed in Section 3.4 of the NHPOSA only against average provision in Penrith City in 2004 based on provision ratios in the Penrith Open Space Action Plan (2007) which were in turn derived from the outdated PLANS report (2004). The Penrith City Council standards used were set out on Tables 3 and 4 in Section 3.4 of the NHPOSA as follows:

Figure 4 Open space provision standards used in the NHPOSA

TABLE 3 – OPEN SPACE PROVISION STANDARDS

OPEN SPACE TYPE	DESCRIPTION	PROVISION RATIO
Active Open Space	City's sportsgrounds currently cover 374.46ha which equates to 2.11ha/1,000 people	2.1ha/1,000 people
Active Open Space – Local	Local active open space - not district open space - is 1.4ha/1,000	1.4ha/1,000 people
Passive Open Space	Based on 328.83ha of parks - 1.85ha/1,000 people. Not including Council managed areas that are classified as natural areas or for community land, nor does it include land required for drainage or biodiversity corridors	1.85ha/1,000 people
Passive Open Space – Local	Based on 291.53ha of parks - 1.64ha/1,000 people	1.64ha/1,000 people

TABLE 4 – ACTIVE AND PASSIVE OPEN SPACE PROVISION ANALYSIS

AREA	CURRENT PROVISION	CURRENT PROVISION RATIO	BENCHMARK PROVISION RATIO	DIFFERENCE
LOCAL PASSIVE OPEN SPACE				
Primary Study Area	3.67ha	2.14ha/1,000 people	1.64ha/1,000 people	+ 0.86ha
Wider study area	14.21ha	2.84ha/1,000 people		+ 6.0ha
ACTIVE OPEN SPACE				
Wider study area	11.2ha	2.24ha/1,000 people	2.1ha/1,000 people	+ 0.63ha

Other appropriate benchmarks should also have been considered, and ideally updated with 2013 open space information for Penrith City and 2011 Census population data, and combined with the NSW Open Space Guidelines 2010 to assess open space provision in the study area and to derive a locally appropriate open space provision standard (refer to Figure 2 above).

Testing the NHPOSA

Table 4 'Active and Passive Open Space Provision Analysis' in the NHPOSA implies that provision of open space in the primary study area and wider study area exceeds the Penrith City open space provision standards (refer to Table 4 in the Urbis report).

As I suspected the calculations in Table 4 of the NHPOSA were incorrect I applied the areas of open space included in Table 5 in Appendix 1 of the NHPOSA to the Penrith City benchmark ratios. However the breakdown of open space allocated to local and district passive and active open space in the study area was not provided as outlined in Table 1 below which made it impossible to check Urbis' calculations and hence their conclusions.

Table 1 Calculation of open space provision in primary and wider study areas

Park	Passive		Active		TOTAL
	Local	District	Local	District	
Primary Study Area					
Wainwright Park	8647				8647
Rodgers and Orth Reserve	2797				2797
Red Cross Anniversary Park	1378				1378
Stafford Street Reserve	4825				4825
Stafford Street/Jamieson Road Reserve	10636				10636
Derby Street/Stafford Street Reserves	8400				8400
TOTAL PRIMARY STUDY AREA m2	36683	0	0	0	36683
TOTAL PRIMARY STUDY AREA ha	3.67	0.00	0.00	0.00	3.67
Wider study area					
Chapman Gardens	78715		71215		149930
Doug Rennie Field			40800		40800
Peppermint Reserve					0
Casuarina Crescent Reserve	25497				25497
Manning Street Reserve	17533				17533
Samuel Foster Reserve					0
Clemson Street	6443				6443
Stapley Street Reserve	4855				4855
Beatson Lane Reserve	3061				3061
Oag Crescent Reserve	5268				5268
Bringelly Road Reserve	8888				8888
TOTAL WIDER STUDY AREA m2	150260	0	0	112015	262275
TOTAL WIDER STUDY AREA ha	15.03	0.00	0.00	11.20	26.23

The areas of open space included in the benchmark analysis given are not clear. The NHPOSA says there are 14.21 hectares of publicly accessible passive open space within the wider study area. Even excluding Peppermint Reserve (8.82 ha) and Samuel Foster Reserve (1.12 ha) which are described as Natural Areas even though they have a significant passive open space role, there is at least 15.0 hectares of passive open space in the Wider Study Area.

Then expanding Table 4 of the NHPOSA, it is not clear how much passive open space is allocated to the District hierarchy in the Wider Study Area to apply the 1.85 ha/1,000 benchmark for district passive open space:

Table 2 Calculation of open space provision standards

Type of open space	Area	2011 population	Current provision	Current provision ratio	Benchmark Provision ratio	Difference (ha/1,000 people)	Difference (area)
Passive open space							
Local	Primary Study area (not including Rodgers Street land)	1,715 people	3.67 ha	2.14 ha/1,000 people	1.64 ha/1,000 people	0.5 ha/1,000 people	+0.86 ha
	Wider study area	5,009 people	14.21 ha	2.84 ha/1,000 people	1.64 ha/1,000 people	1.2 ha/1,000 people	+6.0 ha
District	Primary Study area	1,715 people	0.0 ha	0 ha / 1,000 people	1.85 ha/1,000 people	- 1.85 ha/1,000 people	-3.2 ha
	Wider study area	5,009 people	??	??	1.85 ha/1,000 people	??	??
TOTAL PASSIVE OPEN SPACE		5,009 people	??	??	3.49 ha/1,000 people	??	??
Active open space							
Local	Primary Study area	1,715 people	0 ha	0 ha/1,000 people	1.4 ha/1,000 people	- 1.4 ha/1,000 people	- 2.4 ha
	Wider study area	5,009 people			1.4 ha/1,000 people		
District	Primary Study area	1,715 people			2.1 ha/1,000 people		
	Wider study area	5,009 people			2.1 ha/1,000 people		
TOTAL ACTIVE OPEN SPACE		?	?	?	?	?	?

The conclusion of the NHPOSA that there is an excess of 0.86 hectares local passive open space in the primary study area, an excess of 6.0 hectares of local passive open space in the wider study area, and an excess of 0.63 hectares of active open space in the wider study area is questioned in the absence of a breakdown of local and district active and passive open space in the primary and wider study areas.

In addition, the implication in Table 3 of the NHPOSA that open space be provided according to the mutually exclusive benchmarks show that 7.0 hectares of active + passive open space per 1,000 people should be provided, translating to 12 hectares in the primary study area and 35 hectares in the wider study area as set out in Table 3 below.

Table 3 Application of Penrith City open space benchmarks to determine open space provision in primary and wider areas

Type of open space	Benchmark	Population	Open space required	2011 Provision	Difference
Passive open space					
Local	1.64 ha/1,000 people	5,009 people	8.21 ha	14.21 ha	
District	1.85 ha/1,000 people	5,009 people	9.26 ha	??	
Active open space					
Local	2.1 ha/ 1,000 people	5,009 people	10.52 ha	0.00 ha	
District	1.4 ha / 1,000 people	5,009 people	7.01 ha	11.2 ha	
TOTAL		5,009 people	35.00 ha	??	??

The reliance on numerical standards only to determine open space provision is not appropriate, and has even been incorrectly calculated and applied in the NHPOSA.

If this assessment was undertaken with 2016 Census data with an increased population the apparent “oversupply” of open space in 2013 would not be as great.

2.6.2 Open space characteristics

The characteristics of open spaces in the study area in terms of size, shape, topography, road frontage etc. were not recorded in the inventory in the Appendix, or related to how open spaces in the study area could better meet existing and future needs.

2.7 Recommendations

Gaps and duplication in provision of open space were identified but were not addressed in any meaningful way in the NHPOSA.

The only recommendation of this report is in the final sentence “With the proposed development of the Precinct there will be a need to embellish and upgrade the open space areas.”

There is an astonishing lack of specific recommendations in the NHPOSA to address the issues raised in even a general and superficial way in the report ie. reliance on dual use of drainage open space for public open space, no sporting facilities in the primary study area, limited play equipment or any embellishment in the primary study area, and the inequality of open space provision between the poorer quality open space in the established areas and the higher quality of open space in the Caddens release area.

No recommendations for retention, intensifying or changing use, embellishment, improving access to/from and within, and disposal of existing open space was made; nor recommendations for acquisition of land for open space in any poorly-provided areas within the study area. Based on a “structure plan” of the wider study area I would have expected that such recommendations would have been made for each open space in the local and wider study areas.

Finally, the implications of the loss of any open space in the study area for health-related uses or other development should have been considered and addressed in the NHPOSA.

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3 INFORMATION THAT SHOULD BE INCLUDED IN THE PLANNING PROPOSAL

3.1 Introduction

Similarly to Section 2, this section is arranged according to the broad sections of an open space analysis.

It is understood that Council used the Nepean Hospital Precinct Open Space Analysis (Urbis, 2013) to support the Planning Proposal for Somerset Street and Rodgers Street.

Please refer to Section 2 of this report in terms of the gaps in information provided in the NHPOSA. Ideally such information should be available to include in the Planning Proposal, or at least to inform it, to ensure that the Planning Proposal is robust.

3.2 Scope

The subject land at the corner of Somerset Street and Rodgers Street is in the north-west corner of the study area for the NPHOSA. Although the Great Western Highway to the north and Parker Street/The Northern Road are major barriers to accessing open space, open space to the north, north-west and west should be considered in the open space assessment for the Somerset Street/Rodgers Street site.

Any open space “structure planning” and assessment done for the Penrith Sport and Recreation Strategy should be included in the Planning Proposal. The boundary of the Central East area includes land north of the Great Western Highway, which should have been included and referred to in the NHPOSA.

3.3 Planning context

Most relevant Sydney, West District and Penrith City strategic planning documents have been referred to in the draft Planning Proposal.

Greener Places (Government Architect NSW, 2020) and particularly the Draft Greener Places Design Guide (Government Architect NSW, 2020) should also be referred to because they outline the shift in approach to planning and providing open space from standards to performance-based measures (walking access, multi-purpose, fit for purpose, distribution of recreation spaces and opportunities, linkages, etc.).

Six criteria are set out in the Draft Greener Places Design Guide: Open Space for Recreation guidelines that should be applied in the study area:

- ☐ accessibility and connectivity
- ☐ distribution
- ☐ size and shape
- ☐ quantity

- ☐ quality
- ☐ diversity.

The key change in open space provision is to provide for various types of outdoor recreation opportunities in public open space, including:

- ☐ play spaces
- ☐ recreation spaces
- ☐ active space
- ☐ community space
- ☐ fitness and exercise
- ☐ trail/path based space
- ☐ organised sport
- ☐ off-leash dog exercise.

Capacity thresholds are specified for each outdoor recreation opportunity to ensure that the six criteria listed above are met.

The Draft 50-Year Vision for Greater Sydney's Open Space and Parklands (Department of Planning, Industry and Environment, 2020) and the principles in the Draft NSW Public Spaces Charter (Department of Planning, Industry and Environment, 2020) outline the strategic planning context of public open spaces.

At the Sydney Metropolitan and West District levels, the Sydney Green Grid: Spatial Framework and Project Opportunities (Tyrrell Studio and Office of the Government Architect, 2017) and the West District - Sydney Green Grid: Spatial Framework and Project Opportunities (Tyrrell Studio and Office of the Government Architect, 2017) set the context for open space in the West District and Penrith area.

The Penrith Open Space and Recreation Strategy (Penrith City Council, 2020) is also missing from the Planning Proposal and should be referred to. The Strategy appears to have taken on some of the open space provision recommendations of the West District Plan and the Draft Greener Places Design Guide ie. providing open space within 200 metres of high density residential areas.

3.4 Supply

Current supply of open space as described in Section 3 and Appendix 1 of the NHPOSA should be included. Note the gaps and inaccuracy of the information provided in Section 3 and Appendix 1 of the NHPOSA, as outlined in Section 2 of this report.

The walking "heat maps" produced by EMM which are included in the Planning Proposal are useful to identify areas in the study area which are comparatively less well provided for in terms of walking distance to open space.

3.5 Demand

Changes in population and development since 2013 should be considered for the primary and wider study areas, as follows:

- ☐ 2016 Census data should be applied to an analysis of the open space in the primary and wider study areas.

- ❑ residential and commercial development in the study area since 2013 should be noted so access to open space can be considered.
- ❑ similarly the development of the Caddens release area since 2013 should be factored in to the open space analysis of the wider area.

The Planning Proposal should also include information that addresses concerns raised at the public hearing on 4 May 2018 and from written submissions about open space provision in the study area during the public exhibition of the Planning Proposal. Section 5.2 of the public hearing report (Willana Urban, 2019) sets out the public submissions, and key issues are summarised in Section 5.3, including:

- ❑ the proposal will result in the loss of 0.5 hectares of open space in Kingswood
- ❑ the community understood in 2011 that the land would be returned to parkland after its temporary use as a carpark
- ❑ nearby open spaces are small (Red Cross Anniversary Park), are overcrowded (Wainwright Park), and do not provide facilities and furniture for recreation activities
- ❑ residential development is resulting in an increased need for open space by residents
- ❑ hospital staff and visitors also need open space
- ❑ open space should be provided in the area consistent with NSW planning guidelines at 2.83 hectares per 1,000 people
- ❑ the community wants the land to be embellished for recreation and community uses.

These concerns were recorded but were not addressed in the public hearing report, and have not yet been addressed in the Planning Proposal, nor in available background documents. It is understood from Council that the comments received through community engagement, including submissions received during the public hearing, are addressed in an upcoming Ordinary meeting report on community engagement which is to be provided to Council after the Planning Proposal update has been finalised in response to the findings of this report.

3.6 Assessment

Assessment of open space provision in the study area has the benefit of the recent Penrith Sport and Recreation Strategy (2020) and the Draft Greener Places Design Guide (Government Architect NSW, 2020). I would suggest that an assessment of the open space provision in the study be undertaken using data collected in the preparation of the Sport and Recreation Strategy and by applying the Open Space for Recreation Guidelines in the Draft Greener Places Design Guide.

The implications of the removal of open space across the road from a major hospital should have been addressed, because if the Somerset street/Rodgers Street open space had been embellished it could have been a well used park given its location across the road from the hospital and higher density residential dwellings.

3.7 Recommendations

There is an unexplained leap to the recommendations for open space in the Central East area in the Penrith Sport and Recreation Strategy without any apparent analysis. The recommendations of the Penrith Sport and Recreation Strategy do not include any improvements to the open spaces in the primary study area in the next 15 years, with no justification. The only apparent improvements in the wider study area in the next 15 years are new play facilities in Manning Park, new fitness facilities and improvements to sporting

facilities in Chapman Gardens/Doug Rennie Field, and shade, seating and pathways in Stapley Street Reserve. There is no mention of any improvements to Orth Street Reserve adjacent to the proposed carpark.

4 CONCLUSION

The objective of this peer review is to determine whether the information provided is sufficient to enable an assessment of whether the proposed reclassification of the subject land at the corner of Somerset Street and Rodgers Street in Kingswood is appropriate.

The information provided in the Nepean Hospital Open Space Analysis does not provide adequate assessment of local open space considerations for the numerous reasons set out in Section 2 of this report.

The public open space information provided in the Planning Proposal document should be informed by and supplemented with further information consistent with current planning practice as set out in Section 3 of this report.

Based on my site inspections and review of background information, and without having done an assessment of open space provision using the 2020 Draft Guidelines from the NSW Government Architect which is outside the scope of this report, it appears that:

- ❑ there is probably more than sufficient open space for the population in the primary study area, but it is, with exception of the playground in Wainwright Park, underdeveloped and not embellished, severely limiting its value, attractiveness and usability to the community. Most open spaces in the primary study area are flat and grassed with no embellishment, and are used as thoroughfares. Red Cross Anniversary Park is a thoroughfare and is on an extremely noisy corner, thus limiting any incentive to stay for any length of time in the park.
- ❑ the primary study area, and including the nearby district-level Doug Rennie Field and Chapman Gardens, provides opportunities only for play, field and diamond sport, informal games, and walking/cycling though. The area lacks the range of recreation opportunities expected in local and district parks, such as play opportunities for older children, facilities for young people (skate, basketball, parkour and similar), sports courts, fitness equipment, fenced dog park, and picnic and barbecue areas.

It is regrettable that the temporary carpark is located on open space that is easily accessible across the road from Nepean Hospital. If embellished that land would be a valuable part of the local open space network for residents as well as the hospital community.

The draft Planning Proposal referred to embellishment of the Orth Street open space if the subject land was reclassified and rezoned. The preliminary concept designs for Rodgers and Orth Street Reserve by Group GSA in March 2017 show a through site pedestrian link on Lot 143 Rodgers Street between Rodgers Street and Orth Street, and a detention pond on the Orth Street open space. The through site pedestrian link in particular would partially assist in redressing the loss of the subject land for open space.

The preliminary concept plan by Group GSA shows development fronting Somerset Street. Is there any opportunity for a small landscaped open space/courtyard on Lot 137 fronting Somerset Street for an outdoor/ covered meeting/waiting area for hospital staff, patients and families/friends?

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